

## **Permit-Required Confined Space Program**

### **1.0 Policy**

SUNY Geneseo is committed to providing a safe and healthful work environment for our faculty, staff and students. In pursuit of this endeavor, the following written program is in place to first identify any Permit-Required Confined Spaces (PRCS) and to eliminate or control hazards associated with PRCS operations. This program is in accordance with the Occupational Safety and Health Administration (OSHA) Permit-Required Confined Spaces Standard, Title 29, Code of Federal Regulations 1910.146, as administered by the Public Employees Safety and Health Administration (PESH) of New York State.

### **2.0 Responsibilities**

#### 2.1 Overall Program Responsibilities

The PRCS committee is responsible for the overall implementation and maintenance of any written program or certification concerning the requirements of the Permit-Required Confined Space Standard at SUNY Geneseo.

The members of the PRCS committee include:

Director of Environmental Health and Safety (EH&S)

Assistant Director of Facilities Services

Supervisor of Academic and Residence Hall Zones

Supervisor of Core Shops

Associate Director of Facilities Services

Director of Telecommunications

Heating Plant Stationary Engineer 3

#### 2.2 Permit-Required Confined Space Evaluation

The PRCS committee has determined that PRCS do exist on the SUNY Geneseo campus and a PRCS program is required. It is the responsibility of the all employees to identify possible PRCS not included in the program evaluations to the EHS. Appendix A lists the PRCS identified in the program evaluations.

A Confined Space is (must be all three)

- large enough and designed so that an employee can enter and perform work

- has limited openings
- is not intended to continuous employee occupancy

A PRCS contains (one of the following):

- could contain a hazardous atmosphere
  1. oxygen deficiency (less than 19.5% or more than 23.5%)
  2. toxic gas
  3. flammable or explosive gas
- a material that has the potential to engulf an entrant
- sloping floor or inwardly converging walls
- any other recognized serious safety or health hazard
  1. electrical
  2. mechanical
  3. thermal
  4. water

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### 2.3 Training

EHS will provide training for all employees involved in PRCS entry. Supervisors must identify new employees to the EHS for inclusion in this training, and are required to verify that all personnel have been trained in PRCS Entry prior to becoming involved in such entry.

### 2.4 Initial Contact for Rescue Services

PRCS rescue on the SUNY Geneseo campus will be a combined effort of SUNY Geneseo employees and University Police personnel. University Police will be notified of PRCS entry by the Entry Supervisor prior to initiating entry that emergency services may be necessary. University Police should be informed as to the location of the PRCS and types of hazards that may be encountered within the PRCS.

### 2.5 Equipment

The Director of Facilities Services will ensure that all equipment needed for safe entry into any PRCS is available. Supervisors are required to verify that all necessary equipment is in working order prior to initiating any use.

### **3.0 Permit Required Confined Space Identification**

The PRCS committee has evaluated the workplace and has identified the PRCS identified in Appendix A. Appendix A also lists the hazards identified by each of the PRCS. It is the responsibility of every employee of SUNY Geneseo to bring to the attention of a PRCS committee member, the existence of unmarked Confined Spaces.

### **4.0 Prevention of Unauthorized Entry**

The following methods will be used at SUNY Geneseo to prevent unauthorized entry into PRCS:

- a. Physically eliminating ability to enter PRCS
- b. Posting of danger signs at PRCS reading "Danger - Permit Required Confined Space - Do not Enter", or equivalent warning sign.

## **5. Permit-Required Confined Spaces**

Safe entry procedures have been developed for each PRCS at SUNY Geneseo. These are to be followed to perform entry procedure in a safe manner:

1. Select Entry Team
2. Team reviews entry and hazards
3. Collect required equipment
4. Arrive at site
5. Review hazards and procedures
6. Test atmosphere and ventilate, if needed
7. Eliminate physical hazards, if applicable
8. Record all information on Permit
9. Enter
10. Test atmosphere periodically
11. Complete work
12. Exit
13. Verify completeness of Permit and provide feedback on entry procedures and possible improvements.

### **6.0 Alternate Procedures**

The PRCS committee did not identify any PRCS for which a hazardous atmosphere is the only hazard. As such, Alternate Procedures are not applicable to SUNY Geneseo.

### **7.0 Reclassifying PRCS to Non-PRCS**

PRCS may be reclassified as Non-PRCS when no actual or potential hazardous atmosphere exists within the space and all other hazards are eliminated without entry into the space.

Verification that all hazards within the PRCS have been eliminated must occur for reclassification. This can be accomplished by completing the required sections of the permit. If entry is required to eliminate or verify the elimination of hazards, that entry must be completed under PRCS procedures.

Employees entering a PRCS reclassified to a Non-PRCS must have a means of remote communication.

## **8.0 Personnel, Duties, and Training for PRCS Entry Operations**

PRCS entry under the PRCS program requires the following team:

Authorized Entrant

Attendant

Entry Supervisor

Rescue Personnel (trained team member and University Police)

It is the responsibility of the assigning Department Supervisors (Director of Telecommunications, Director of CIT, appropriate Facilities Services supervisor, etc.) to ensure that personnel are assigned tasks for which they are trained and qualified.

## **9.0 Host Employer's Responsibilities with Contractors**

The Office of Facilities Planning will provide off-site Contractors with the potential to encounter PRCS on the SUNY Geneseo campus notice that OSHA rules are applicable to entry into confined spaces. The Directors of Telecommunications and Computer Services must convey this information to all Contractors performing work for their departments. All atmospheric readings and copies of Contractor Confined Space Entry Permits must be delivered to the EHS within two weeks of collection.

Any contractors found to be in PRCS without employing the required procedures are to be notified that a report of their activities will be filed with the appropriate OSHA office if not corrected immediately.

## **10.0 Rescue and Emergency Services**

The precautions and procedures outlined in our written PRCS Program are designed to ensure the safety of SUNY Geneseo employees while working in PRCS. Under no circumstances are SUNY Geneseo employees to enter a PRCS where hazards have not been eliminated or effectively controlled.

Additionally, it is recognize that unexpected situations may arise that prevent entrants from self-rescue. In such situations, rescue and emergency response will be a combined effort of trained PRCS entry personnel and University Police personnel. The following procedures will be followed in such situations:

Attendant will contact University Police (5651 or 5222) or by radio.

Rescue personnel will retrieve injured or unresponsive personnel.

University Police will provide emergency first aid assistance and summon ambulance, if required.

At no time will University Police or other rescue personnel not trained in PRCS entry or not equipped with proper PPE or respiratory protection (if required) be permitted to enter the PRCS.

## **11.0 Training**

SUNY Geneseo employees will receive the following types of training specific to their duties and potential for entry into PRCS.

Awareness Training

Training for Reclassification of PRCS

Both PRCS to Non-PRCS and PRCS to Non-PRCS

PRCS Entry Procedures

Emergency Procedures

## **12.0 Permit-Required Confined Space Program Review**

The PRCS Committee will conduct a review of the SUNY Geneseo PRCS program at least annually (May of each year) using canceled entry permits to identify any program deficiencies or improvements. Any corrective measures will be documented by a revision of the program. Employees will be trained on any changes. Additionally, employees who note any deficiencies or identify possible program improvements should contact their supervisor.

### **Confined Space Entry Program**

#### **Appendix A**

Heating Plant boilers	Limited Egress
	Mechanical
Water Tanks	Limited Egress
	Mechanical
	Chemical (cleaning chemicals, molds, spores)
	Visual
Manholes (all types)	Limited Egress
	Mechanical
	Sanitary - Engulfment, Explosive

	Steam - Engulfment, High Temp
	Electrical - Shock
	Chemical (toxics, O2 deficiency)
	Visual
Elevator Shafts and Pits	Limited Egress
	Mechanical (Crushing, Electrical)
	Chemical (particulates, O2 deficiency)
Air Handlers that CAN be bodily entered	
	Limited Egress
	Mechanical (physical and electrical)
	Chemical (particulates, toxics in Greene and Bailey)
	Visual

## **Appendix B**

### **General Responsibilities for PRCS Entry Personal**

#### Authorized Entrant:

##### *Responsibilities and Requirements prior to Entry:*

- know the potential hazards associated with entry into the specific PRCS
- have the ability and knowledge to recognize signs or symptoms of exposure
- comprehend the consequences of exposure to the hazards
- know how to operate all equipment necessary for entry operations

##### *Responsibilities during Entry Procedures*

- communicate with the attendant as to status and any need for evacuation alert the attendant of any warning sign or symptom of exposure

must exit when the attendant or other authorized entrant indicates evacuation is necessary or under any of the following conditions:

- a warning sign or symptom of exposure is recognized
- a prohibited condition is detected
- an evacuation alarm is activated

Attendant:

*Responsibilities and Requirements prior to Entry*

know the potential hazards associated with entry into the specific PRCS

be aware of possible behavioral effects of atmospheric hazards (see MSDS)

know emergency response procedures

*Responsibilities during Entry Procedures - **the attendant should not be engaged in any activities which would interfere with his or her ability to perform the requirements listed below.***

keep unauthorized personnel out of area

maintain an accurate count of authorized entrants within a PRCS

remain outside the PRCS until all entrants have evacuated the PRCS or until relieved by another authorized attendant.

maintain communication with the authorized entrants to monitor status

monitor activities inside and outside PRCS to determine if it is safe for entrants to remain in PRCS or if evacuation is warranted

order an evacuation if:

- a prohibited condition is detected
- a behavioral manifestation of exposure by an authorized entrant
- an outside condition occurs that could endanger the authorized entrants
- ability to perform duties of attendant is compromised

summon rescue and emergency response, if needed.

***An authorized attendant may initiate rescue only if properly trained and only after being relieved by another authorized attendant.***

All Heating Plant, Zone and Core Shop personnel are to be trained as PRECS entrants and attendants.

Entry Supervisor - has overall accountability for PRCS entry procedure adherence

*Responsibilities and Requirements prior to Entry:*

ensure Entry Team is trained for the specific PRCS entry and the specific tasks associated with PRCS

know the potential hazards associated with entry into the specific PRCS

verify that appropriate entries have been made on the permit, all required test have been performed and results recorded, and that all procedures and equipment are in place prior to endorsing the permit

verify that rescue personnel and equipment are in place and that University Police has been notified of the PRCS entry

*Responsibilities during Entry Procedures*

terminate entry and cancel permit when:

entry operation is completed

a prohibited condition arises

verify compliance with permit conditions and PRCS Program

Maintenance Supervisors I and II, with direct supervisory responsibilities, and Plant Utilities Engineer II and III are to be trained as Entry Supervisors.

PRCS Rescue and Emergency Response

Rescue within PRCS will be accomplished by SUNY Geneseo PRCS Team members. It is always preferable that remote rescue be facilitated. Annual practices of PRCS rescue must be performed by each team. PRCS entry for rescue should be considered only as a last resort. Each team will have an individual designated for rescue. This individual must have received, at a minimum, the same training as the authorized entrants. Emergency response personnel (University Police and/or Emergency Ambulance Squad) will provide emergency first aid, if warranted.



