

## **POLICY**

This confined spaces policy is designed to ensure the safety and health of E & B Oilfield Services Inc.'s employees by limiting exposure to the hazards present while working in construction, in and around confined spaces. There are new components in the Confined Spaces in Construction regulations that reflect different challenges present at a construction worksite to include: higher employee turnover, changing worksites and multiple contractors (controlling and subcontractors). Affected employees from all levels will be allowed input on development, implementation and review of all aspects of the confined spaces entry program.

Except where another policy states otherwise, this written confined space policy will be followed whenever and wherever the company's employees could enter or be exposed to confined space hazards for all construction work including modifications and upgrades. This program will be available to any employee and their representative at any time.

## **RESPONSIBILITIES**

Confined space safety is a responsibility shared between E & B Oilfield Services Inc. and its employees.

### **Employer Responsibilities**

- Develop and implement a written permit space program — available onsite for inspection by employees or their representatives — if employees are directed to enter permit spaces.
- Involve affected employees on this policy, ensuring they are educated on the elements of confined space safety and trained in worksite specific procedures.
- Seek employee input during an annual review of this policy.
- Provide all necessary information to ensure employees work safely in and around confined spaces.
- Determine that employees can proficiently perform their assigned duties.
- Document training and keep training records for all current employees.
- Keep cancelled permits until an annual review can be conducted.
- Provide all documents to the Secretary of Labor upon request.
- Reevaluate confined spaces whenever an employee requests it.

Each employer who identifies or receives notice of a permit space and has not authorized employees it directs to work in that space, must take effective measures to prevent those employees from entering that permit space.

### **Employee Responsibilities**

- Follow all OSHA rules and regulations.
- Follow established safe work policy and procedures.
- Participate in the development and implementation of the permit required confined space entry program.
- Participate in all required training.
- Be aware of potential hazards and request a reevaluation when a new hazard is suspected.

## **STANDARDS AND REGULATIONS**

- Subpart AA — Confined Spaces in Construction 29 CFR 1926.1201 - 1213
- Federal OSHA General Duty Clause, Section 5(a)(1)

## **DEFINITIONS**

**Attendant** means an individual stationed outside one or more permit spaces who assesses the status of authorized entrants and who must perform the duties specified in § 1926.1209.

**Authorized entrant** means an employee who is authorized by the entry supervisor to enter a permit space.

**Competent person** means one who can identify existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to employees and who has the authorization to take prompt corrective measures to eliminate them.

**Confined space** means a space that is large enough and so configured that an employee can bodily enter it, has limited or restricted means for entry and exit and is not designed for continuous employee occupancy.

**Controlling Contractor** is the employer that has overall responsibility for construction at the worksite.

**Entry** means the action where any part of a person passes through an opening into a permit-required confined space. Entry includes any work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space, whether or not such action is intentional or any work activities are actually performed in the space.

**Entry Employer** means any employer who decides that an employee will enter a permit space.

**Entry supervisor** means the qualified person (such as the employer, foreman or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations and for terminating entry as required.

**Host employer** means the employer that owns or manages the property where the construction work is taking place.

**Inerting:** is the displacement of the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible.

**Isolation:** is the process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes or ducts; a double block and bleed system; lockout or tagout of all sources of energy; or blocking or disconnecting all mechanical linkages.

**Permit-required confined space (permit space)** means a confined space that has one or more of the following characteristics:

1. Contains or has the potential to contain a hazardous atmosphere.
2. Contains material that has the potential for engulfing an entrant.
3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section.
4. Contains any other recognized serious safety or health hazard.

**Rescue service** means the personnel designated to rescue employees from permit spaces.

**Test or testing** means the process by which the hazards that may confront entrants of a permit space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

**Ventilate or ventilation** means controlling a hazardous atmosphere using continuous forced-air mechanical systems that meet the requirements of § 1926.57 (Ventilation).

### General Safety Considerations

The company must:

- Implement the measures necessary to prevent unauthorized entry.
- Identify and evaluate the hazards of permit spaces before employees enter them.
- Develop and implement the means, procedures and practices necessary for safe permit space entry operations.
- Provide entry equipment at no cost to each employee, maintain that equipment properly and ensure that each employee uses that equipment properly.

For permit required pre-entry testing and periodic monitoring, the company will provide an early-warning system that continuously monitors for non-isolated engulfment hazards and continuously monitor atmospheric hazards.

In an emergency or failed non-entry rescue, the attendant will summon rescue and emergency services. No unauthorized personnel may attempt a rescue.

E & B Oilfield Services Inc. will be consulted for all permit required matters, including preparation, issuance, use and cancellation of entry permits under both planned and emergency conditions.

When the measures taken under the permit space program may not protect employees, the program will be revised to correct deficiencies found to exist before subsequent entries are authorized. Examples of circumstances requiring the review of the permit space program include but are not limited to: any unauthorized entry of a permit space, the detection of a permit space hazard not covered by the permit, the detection of a condition prohibited by the permit, the occurrence of an injury or near miss during entry, a change in the use or configuration of a permit space and employee complaints about the effectiveness of the program. The company will review the permit space program, using the canceled permits within one (1) year after each entry. It is permitted to perform a single annual review covering all entries performed during a 12-month period. If no entry is performed during a 12-month period, no review is necessary.

Before permitting required entry is authorized, each entry employer must document the completion of measures for safe entry. The documentation must be made available at the time of entry to all authorized entrants by posting it at the entry portal or by any other equally effective means. The permit may not exceed the time required. The permit will be cancelled when the entry operations is completed, suspended or cancelled when conditions dictate. The permit must be fully reassessed before allowing re-entry. The entry employer must retain each canceled entry permit for at least one (1) year to facilitate the review of the permit-required confined space program. It is permitted to perform a single annual review covering all entries performed during a 12-month period. If no entry is performed during a 12-month period, no review is necessary.

Training will be at no cost to the employee and the company will ensure that the employee possesses the understanding, knowledge and skills necessary for the safe performance of the duties assigned. Training must be in both a language and vocabulary that the employee can understand.

Training must be conducted in the following scenarios:

- Before the employee is assigned confined space entry work
- Before there is a change in assigned duties
- Whenever there is a change in permit space entry operations that presents a hazard, an employee has not previously been trained
- Whenever there is any evidence of a deviation from the permit space entry procedures or there are inadequacies in the employee's knowledge or use of these procedures.

The training must establish employee proficiency in their assigned duties and must introduce new or revised procedures. The company must maintain training records: contain each employee's name, the name of the trainers and the dates of training. The documentation must be available for inspection by employees and their authorized representatives, for the period of time the employee is employed by that employer.

### **IDENTIFYING CONFINED SPACES AND HAZARDS**

A confined space is an area an employee can enter but is not designed for continuous occupancy and does not have an unrestricted entry or exit. A permit required confined space (PRCS) has a serious health or safety hazard, such as the possibility for a hazardous atmosphere, material that can engulf a person or is in a shape that can trap or asphyxiate a person (e.g., converging or sloping walls or floor).

To help provide an understanding for determinations OSHA has provided a limited list of work sites that could have a confined space: bins, boilers, pits, elevators, escalators, pumps, manholes and tanks (containers).

The company will ensure that a competent person will identify all the confined spaces an employee might work in, before the work begins and determine which requires permits. Employees and the controlling contractor will be informed directly of the location and danger in each permit space. Signs that effectively warn of the danger and prohibit entry will be placed at permit space entrances.

Each entry employer will have a competent person evaluate non-permit spaces initially and when there are changes to the use or configuration that might increase entrant hazards to decide whether to reclassify it.

Work will be scheduled as much as reasonably possible to avoid confined spaces by finishing tasks in areas before they become confined spaces.

E & B Oilfield Services Inc. will identify permit-required confined spaces in E & B Oilfield Services Inc. workplaces. If the workplace contains one or more permit spaces, E & B Oilfield Services Inc. will inform exposed employees by posting danger signs or by any other equally effective means of the existence and location of and the danger posed by the permit spaces.

NOTE: A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language would satisfy the requirement for a sign.

## **COMMUNICATING BETWEEN EMPLOYERS**

As the host employer, all details (e.g., entry employer's entry program, known hazards, new hazards and hazard elimination/isolation procedures) about confined spaces at the worksite will be communicated with the controlling contractor before and after entry. Where the company has contracted with the property owner to manage it and transmit all confined space details, it will be considered the host employer.

As the controlling contractor, all details (e.g. employer's entry program, location of confined spaces and PRCS, known hazards, new hazards and hazard elimination/isolation procedures) will be communicated with the host employer and all entry employers (i.e. subcontractors) before and after entry, ensuring that information is transferred to the different entry employers (e.g. posting signs) before and during entry so they don't create additional hazards for other entry employers' employees. Details will be communicated with other non-entry employers so that their employees do not create hazards or go into the confined space.

As the entry employer, all details (e.g., entry program, known hazards, new hazards and hazard elimination/isolation procedures) about confined spaces at the worksite will be communicated with the controlling contractor before and after entry.

As a non-entry employer, essential details about confined spaces will be communicated with the controlling contractor to determine where the confined spaces are and the necessary steps to prevent employees from accessing them or creating hazards for other employees. Employees will be instructed not to enter the identified confined spaces.

## **NON-PERMIT SPACES**

### **Alternate Entry**

The employer will use alternate procedures to enter a non-permit required space if the employer can demonstrate each of the following conditions are addressed:

- All physical hazards in the space are eliminated or isolated through engineering controls so that the only hazard posed by the permit space is an actual or potential hazardous atmosphere.
- Continuous forced air ventilation is utilized to maintain safe for entry.
- The space should have continuous monitoring unless the employer has supporting data that demonstrates continuous monitoring is unnecessary)

### **Non-Permit Space Re-Evaluation**

When there are changes in the use or configuration of a non-permit required confined space that might increase the hazards to entrants (or some indication that the initial evaluation of the space may not have been adequate), each entry employer must have a competent person reevaluate that space and, if necessary, reclassify it as a 'permit-required' confined space.

## **CONFINED SPACES WITH ONLY ATMOSPHERIC HAZARDS**

The following procedures and conditions are for entering a confined space with only atmospheric hazards that can be made safe to enter through forced air ventilation during entry.

To be more specific, all physical hazards must be eliminated or isolated through engineering controls and the forced air ventilation has to keep the space safe for entry and entrants must be able to exit safely if ventilation stops working.

If the above can be proven and documented with monitoring and inspection where the data is available to each entrant, the space can be entered without a permit, attendant or rescue and emergency equipment once the company certifies that:

- Entrance covers can be safely removed.
- Entrance openings are immediately guarded by a railing, temporary cover or barrier that prevents accidental falls into the opening and protects entrants from foreign objects falling into the space.
- The internal atmosphere shall be tested with a calibrated direct-reading instrument prior to allowing entrants into the space, testing shall be conducted in the following order: oxygen content, flammable gases and vapors and potential toxic air contaminants. The testing procedure is evaluated to ensure it is appropriate for the possible atmospheric hazards. This may mean identifying the possible toxic air contaminants and ensuring the gas detector can detect it and testing at the top, middle and bottom of the space to account for different gases' density. Any employee who enters the space or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.
- Testing and continuous monitoring ensures there is no hazardous atmosphere.
- Continuous forced air ventilation from a clean source directed — to the lowest spot or furthest corner — so that it eliminates any hazardous atmosphere from the space while anyone is in there.
- Continuously monitoring the atmosphere in the space with monitoring equipment, unless necessary monitoring equipment is not commercially available, that will sound an alarm notifying all entrants if a hazard exceeds the atmospheric thresholds.
- Where the preferred continuous monitoring is not used because of equipment limitations or that periodic monitoring is demonstrably sufficient, periodic monitoring will be often enough to detect a hazardous atmosphere is building up and that entrants have time to exit.
- Once a hazard is observed everyone will immediately leave the space. The hazard source is then found — and the company will take steps to protect employees before they enter that space again.
- There is a safe way to enter and exit the space, including a personnel hoist made for that purpose or a job hoist approved ahead of time in writing by a registered professional engineer.

The written certificate must contain the date, location of the space and the signature of the person certifying the above conditions have been met. Certification must be made before anybody enters and be available to every employee entering the space. The employer will reevaluate the space if there is a change to the space that may increase hazards or there is indication the current evaluation is incorrect.

## **RECLASSIFYING PRCS FOR ENTRY**

Permit required confined spaces without any potential atmospheric hazard can be reclassified as non-permit required once a competent person with the entry employer certifies that:

- The space poses no actual or potential atmospheric hazards and if the hazards can be eliminated or isolated without entering the space.
- If the entry employer can show they have to enter the space to remove the hazard, then they can do that following the permit process.
- Testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated or isolated.
- Forced air ventilation does not constitute elimination or isolation of the hazards.
- Document the basis for determining that all hazards in a permit space have been eliminated or isolated.
- Through a certification that contains the date, the location of the space and the signature of the person making the determination
- If hazards arise within a permit space that has been reclassified as a non-permit space, each employee in the space must exit the space. The entry employer must then reevaluate the space and reclassify it as a permit space.

The written certificate must contain how all the hazards have been eliminated or isolated, the date, location of the space and the signature of the person certifying the above conditions have been met. Certification must be made before anybody enters and be available for every employee entering the space. If new hazards are identified everyone must leave the space and the entry employer will reevaluate.

## **ENTRY EMPLOYER RESPONSIBILITIES**

As an entry employer, the company will create and put into action the following measures to protect its and other employees both inside and outside confined spaces.

- Prevent unauthorized entry. Using covers, signs or an attendant at the entrance etc.
- Ensure safe permit space entry operations.
- Provide the necessary equipment.
- Evaluate permit spaces during entry.
- Provide attendants outside permit spaces during entry.
- Describe how the attendant monitoring multiple spaces will respond to emergencies.
- Assign a role to every person in an entry, identify their duties and provide required training.
- Rescue and emergency services for PRCS.
- Entry permits.
- Coordinate entry operations when more than one entity performs permit space entry at the same time and/or entry is performed at the same time that any activities that could foreseeably result in a hazard in the permit space are performed.
- The controlling coordinator must debrief each entity that entered a permit space regarding the permit space program followed any hazards confronted or created in the permit space(s) during entry operations.
- Review this policy annually and following any incidents or near misses.

## **SAFE PERMIT SPACE ENTRY OPERATIONS**

A competent person will identify and evaluate permit space hazards before any employees enter it and establish all the elements to ensure safe work in the area, especially:

- Citing the acceptable entry conditions.
- Authorized entrants can observe space testing and monitoring.
- Isolating the space and its hazards.
- Controlling atmospheric hazards through purging, inerting, flushing or ventilating.
- Reducing the atmosphere to below 10 percent of its lower flammable limit (LFL) or inerting the atmosphere so that it is entirely non-combustible and addressing the other atmospheric hazards like oxygen deficiency through personal protective equipment (PPE).
- Ensuring monitoring procedures will detect atmospheric hazard level increases quickly enough for entrants to exit in case ventilation stops working.
- Having necessary barricades or barriers to prevent unauthorized entry and to protect entrants from external hazards.
- Conditions continue to allow safe entry the entire time.
- The necessary PPE effectively protects every employee and that they have the PPE before entering a hazardous atmosphere.
- Conditions, like high pressure, that can make removing an entrance cover unsafe are eliminated.

## **EVALUATING PERMIT SPACE CONDITIONS**

Prior to allowing entrants into a confined space, the internal atmosphere shall be tested with a calibrated direct-reading instrument, testing shall be conducted in the following order: oxygen content, flammable gases and vapors and potential toxic air contaminants. Any employee who enters the space or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.

The testing procedure is evaluated to ensure it is appropriate for the possible atmospheric hazards. This may mean identifying the possible toxic air contaminants and ensuring the gas detector can detect it and testing at the top, middle and bottom of the space to account for different gases' density.

Atmospheric test results shall be posted with the permit at the entry to the confined space and any affected employee shall be informed of the results.

If it is part of a larger continuous system and cannot be isolated, pre-entry testing will be done and conditions will be continuously monitored unless necessary monitoring equipment is not commercially available. Work in large or continuous systems also requires a sufficient early-warning system continuously monitoring for engulfment hazards.

Continuously monitoring the atmosphere in space with monitoring equipment, unless necessary monitoring equipment is not commercially available, that will sound an alarm notifying all entrants if a hazard exceeds the atmospheric thresholds.

## **ENTRY PERMITS**

E & B Oilfield Services Inc. ensures that a permit will be completed prior to entry into a permit required confined space. The entry permit shall be utilized to document control measures and shall include the safe procedures necessary for concluding the entry operation.

The entry permit be utilized to document control measures that protect company employees involved in permit required confined space operations. The program must also include the procedures necessary for concluding entries into permit required confined spaces.

Each entry employer will ensure conditions are safe for entry in permit spaces through establishing, suspending and cancelling entry permits. If there are multiple entry employers in a confined space during the same entry, then one permit will be completed by coordinating with the controlling contractor and all entry employers. The permit will be made available (e.g., posted at the entry) for all entry employers to document the completion of necessary safety measures.

Through completing an entry permit all measures needed to make the PRCS safe for entry will be documented. The entry supervisor on the permit will sign the entry permit authorizing that these necessary measures have been taken. The permit's duration will be the amount of time needed to complete the task as identified on the permit. Every entry permit will be kept for at least one year and addressed in the annual review. The entry supervisor will terminate the permit when the task identified is completed, suspended or will cancel the permit when necessary.

A permit will be suspended when a temporary condition not allowed in the permit occurs in or near the PRCS and does not change its configuration or creates any new hazard. The entry supervisor needs to reevaluate the PRCS before lifting any suspension or cancelling the permit. A permit will be canceled when a condition not allowed in the permit occurs in or near the PRCS and is not temporary or changes its configuration or creates any new hazard.

### **Items on an Entry Permit**

In order to identify everything needed to make a permit safe for entry the following items will be addressed:

- The permit space's location.
- The reason for entry.
- Date and duration of the entry.
- Authorized entrants identified so the attendant can easily track who is inside the PRCS.
- How any hazardous atmospheric levels will be tracked should ventilation stop.
- The name of every attendant.
- The name of every entry supervisor and the signature of the one that authorized entry.
- Hazards in the PRCS.
- How the hazards will be isolated, eliminated or controlled before entry (e.g., lockout tagout, purging, inerting, ventilating and flushing).
- Acceptable entry conditions.
- Results and times of appropriate testing and monitoring, including the names or initials of who did the test.
- Rescue and emergency services and how they will be called.
- How entrants and attendants will communicate during entry.
- The necessary equipment.
- Additional permits needed to complete the task in the confined space.

## **EQUIPMENT**

As an entry employer, the company will provide suitable equipment needed to safely enter, exit from and conduct rescues in confined spaces. The equipment will also be properly maintained and all employees will know how to and be expected to use it correctly. Any equipment must also meet the regulations specific to it. For example, respiratory equipment must meet the respiratory regulation 1926.103 and barriers are governed by the rules for guardrails, 1926.502(b). The following equipment is specifically mentioned by OSHA:

- Adequate testing and monitoring equipment.
- Ventilating equipment that makes entering possible.
- Communication equipment that allows attendant to talk to entrants, assess status and tell them to evacuate.
- PPE that meets any other applicable regulations where engineering and administrative controls do not give enough protection.
- Lighting that meets construction's minimum illumination in foot-candles (1926.56), that will not ignite the specific gas, vapor, dust or fiber present and that enables employees to work safely and exit during emergencies.
- Barriers and shields that effectively isolate the confined space.
- Ladders needed to enter and exit the confined space.
- Rescue and emergency equipment that is called for in the company's emergency rescue policy.

## **AUTHORIZED ENTRANTS**

Authorized entrants will know and understand which potential hazards are in each confined space such as: how they could be exposed, signs, symptoms and consequences.

Entrants are expected to properly use all equipment, communicate with attendant and be ready to exit any permit space quickly.

Communication includes working with the attendant to instill awareness of personal health in light of the potential hazards. This awareness includes sharing information with the attendant about any symptoms, warning signs or prohibited conditions.

The entrant must exit permit spaces when:

- Told to by the attendant or entry supervisor.
- There is an exposure warning sign or symptom.
- They detect a prohibited condition
- An evacuation alarm is activated.

## **ATTENDANT RESPONSIBILITIES**

An attendant's primary responsibility is to evaluate and protect authorized entrants inside permit required confined spaces. These responsibilities include:

- Be familiar with and understands the hazards that may be faced during entry, signs or symptoms and consequences of the exposure.
- Be aware of possible behavioral effects of hazard exposure in authorized entrants.
- Continuously maintain an accurate count of authorized entrants in the permit space
- Know the means used to identify authorized entrants.
- Remain outside the permit space during entry operations until relieved by another attendant.
- Communicate with authorized entrants as necessary to assess entrant status and to alert entrants of the need to evacuate the space.
- Assessed activities and conditions inside and outside the space to determine if it is safe for entrants to remain in the space.
- Order the authorized entrants to evacuate the permit space immediately if conditions warrant from inside or outside the entry space.
- If the attendant cannot effectively and safely perform all the duties required under this section
  - Summon rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
  - Takes appropriate actions when unauthorized persons approach or attempt to enter a permit space.
- Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space.
- Perform non-entry rescues as specified by the employer's rescue procedure.
- Perform no duties that might interfere with the attendant's primary duty to assess and protect the authorized entrants.)

Attendants will know and understand which potential hazards are in each confined space such as: how entrants could be exposed, signs, symptoms and consequences. This includes knowing how the hazard could affect entrants' behavior.

Attendants will also continuously track authorized entrants in the permit space and accurately document it on the permit.

Attendants will know and understand which potential hazards are in each confined space such as: how entrants could be exposed, signs, symptoms and consequences. This includes knowing how the hazard could affect entrants' behavior. Attendants will also continuously track authorized entrants in the permit space and accurately document it on the permit.

In the event of an emergency, if more than one confined space is monitored by a single attendant, the attendant must:

- Immediately call for help over the radio.
- Request backup.
- Order the evacuation of all entrants.
- Keep in contact with affected entrants.
- Remain on scene until help arrives.

Attendants shall be stationed outside a permit required confined space while entrants are inside and shall remain outside for the duration of the operation. Attendants monitoring multiple permit spaces shall have the ability to respond to emergencies while maintaining safe oversight of all assigned confined space or is relieved by another trained attendant.

During an emergency, regardless of whether an entrant can escape, the attendant shall remain until properly relieved. Once another attendant is on the scene, the attendant still can only try an entry rescue if they have the necessary equipment, are trained to do so and the entry permit allows for it.

Communication includes working with the entrant to instill awareness of personal health in light of the potential hazards, the confined space conditions and when to evacuate.

The attendant is responsible for determining when a confined space is no longer safe and ordering entrants to evacuate whenever:

- There is a prohibited condition.
- The entrant is showing behavioral effects of exposure.
- Something outside the confined space could be dangerous to entrants or
- If the attendant can't focus on all required responsibilities.

As soon as the attendant assesses that entrants need help to evacuate the permit space, he/she will immediately call rescue and emergency services as described in the permit and start non-entry rescue established in the permit.

When an unauthorized person approaches a confined space, the attendant will tell him/her to exit immediately. The attendant will tell the entrants and supervisor there is an unauthorized person in the permit space.

Attendants will not be assigned or allowed to do any work that takes their attention away from their focus on the confined space and the safety of people inside and outside it. This means attendants can do tasks that add to their knowledge of permit space conditions, like monitoring atmospheric conditions or passing tools to entrants from outside the space. Although this knowledge can be part of the job description, tasks that do not require continued attention away from or leaving the permit-required confined space are not included. An attendant will not monitor more than one confined space at a time.

E & B Oilfield Services Inc.'s program includes the means and procedures that are used if more than one confined space is monitored by a single attendant in order to enable the attendant to respond to emergencies in one or more permit spaces that he/she is monitoring without distraction from all responsibilities.

## **ENTRY SUPERVISOR RESPONSIBILITIES**

For every permit-required confined space entry, the entry employer will assign an entry supervisor who can complete the following responsibilities:

- Knowing the hazards of the confined space.
- Verifying the permit is completed correctly.
- Ordering evacuation and cancelling or suspending the permit.
- Communicating with and verifying the availability of emergency and rescue services.
- Removing anyone unauthorized who tries to go into a permit space.
- Assessing the permit-confined space when taking over responsibility and periodically as needed.

Entry supervisors will know and understand which potential hazards are in each confined space such as: how entrants could be exposed, signs, symptoms and consequences. The entry supervisor will be someone who knows at least as much as the authorized entrants and attendants and should be someone who knows even more about the space and hazards.

Before signing it, the supervisor will check the completed permit to be sure everything identified in the permit is correct: tests completed, procedures followed and equipment in place.

The entry supervisor is responsible for deciding when there are unsafe conditions for an ongoing permit entry, terminating the entry and then cancelling or suspending a permit. A permit can be cancelled when the entry permit is completed or there is a new condition not addressed on the permit. The supervisor can also suspend a permit if a condition requires temporary evacuation and the space soon returns to acceptable conditions in the permit. After reevaluating the permit space, the entry supervisor can remove the suspension but will record it on the permit.

The entry supervisor will check that needed emergency and rescue services are available, can be reached and can themselves respond in a timely manner during the permit-required confined space entry and ensuring the employer is notified in the event that rescue services become unavailable.

The entry supervisor is responsible for preventing unauthorized entry into a permit space and immediately removing from the worksite any unauthorized person who has entered a permit space.

When taking over responsibility of a permit space entry, the new entry supervisor will check the confined space conditions to make sure they are within safe levels and consistent with the permit. The entry supervisor is also responsible for periodically assessing the hazards and work within a confined space as often determined necessary according to the nature of the possible hazards and expected change of conditions.

## **TRAINING**

E & B Oilfield Services Inc. shall provide affected employees with adequate training that establishes proficiency in their assigned duties. Training shall be conducted in a vocabulary and language they understand so that they are proficient in their expected responsibilities. This training will occur:

- Before they are assigned duties covered in this policy.
- Before a change in assigned duties.
- When a change in permit space operations (e.g., new equipment, techniques, promotions, reassignments) introduces a new hazard the employee has not trained for.
- When a departure from or a lack of knowledge in the established procedures is noticed.

Assigned duties include authorized entrant, attendant, entry supervisor and emergency rescue. Employees not authorized to enter confined spaces will also be trained on the hazards of the confined spaces at the worksite and what they need to know to avoid them.

The company will determine that training has effectively taught the employee to proficiently perform their assigned duties.

The training and determination of proficiency will be documented and kept for all current employees. This documentation will be available to all employees who ask for it and the Secretary of Labor upon request.

## **RESCUE AND EMERGENCY SERVICES FOR PRCS**

Rescue and emergency service procedures are a necessary component of the permit and include the preferred non-entry and entry rescues. The non-entry can be initiated immediately by the attendant and entry supervisor who remains outside the PRCS. Entry rescues need to be either from a designated outside source or a team of selected employees and each has their own requirements. Unauthorized personnel shall not attempt a rescue.

Prior to entry into a permit required space, E & B Oilfield Services Inc. will identify personal, equipment and services necessary to perform an effective rescue.

E & B Oilfield Services Inc. shall develop and implement a means of communication to summon rescue in case of an emergency, this may include the entrant tugging on the rope on a regular interval of time.

Any injured entrant that is exposed to a hazardous substance at the worksite will bring the associated Safety Data Sheet (SDS) and provide it to the facility where the medical treatment takes place.

### **Non-entry Rescue**

The company will establish non-entry rescue procedures for all permit-required confined spaces, unless it can demonstrate that the necessary retrieval equipment (e.g., body harness, retrieval lines, block and tackle, winch system) increases the risk or does not help rescue.

Non-entry retrieval systems will include a chest or full body harness with the retrieval line at the center of the back where it creates a small profile to successfully remove the entrant. This can be at the shoulder level or above the entrant's head. When the chest or body harness will not work or creates a greater hazard, wristlets or anklets may be used.

The line will be attached outside the permit space so that it can be used to pull entrants out as soon as they need to be rescued. This can either be a mechanical device like a block and tackle or winch system or a fixed point. Vertical entrances more than five feet deep call for a mechanical device to assist rescue.

Circumstances described by OSHA that increase risk of or hamper rescue include anything that can catch onto or entangle the retrieval line like physical obstructions, airlines, electric cords and additional retrieval lines from multiple entrants. The distance entrants have to go into the space and how much they will have to move around can also affect the decision that a retrieval system is too dangerous.

### **Outside Rescue and Emergency Services**

Outside rescue and emergency services will be evaluated to ensure they can respond quickly and have both the equipment and ability to provide rescue when considering each PRCS and the identified hazards.

The company will provide hazard information about its confined spaces and allow the service to go to the PRCS and develop rescue plans. The service selected must have the training, equipment, ability and willingness to perform rescues. The service also has to agree to tell the company when it will be unable to perform rescues.

The time it takes the service to reach the permit space, enter and retrieve entrants will also be considered, along with the rescue requirements of other regulations. If the PRCS could have an atmosphere that is immediately dangerous to life or health (IDLH), the respiratory protection standard requires standby rescue personnel equipped with respiratory protection. A response time of 15 minutes may be determined adequate for mechanical hazards that could cause broken bones or abrasions.

### **Employee Rescue and Emergency Services**

When selecting a team of employees to provide rescue and emergency services, E & B Oilfield Services Inc. will

- Evaluate a prospective Rescue and Emergency Service's ability to respond to a rescue summons in a timely manner, considering the hazard(s) identified. What will be considered timely will vary according to the specific hazards involved in each entry.
- Evaluate a prospective rescue service's ability, in terms of proficiency with rescue-related tasks and equipment, to function appropriately while rescuing entrants from the particular permit space or types of permit spaces identified.
- Select a rescue team or service from those evaluated that: has the capability to reach victims within an appropriate time frame for that hazard; is equipped for and can proficiently perform necessary rescue.
- Inform each rescue team or service of the hazards they may confront when called on to perform rescue at the site.
- Provide the rescue team or service selected with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.

E & B Oilfield Services Inc. employees who have been designated to provide permit space rescue and emergency services will be instructed in and adhere to the following measures:

- Provide affected employees with the PPE needed to conduct permit space rescues safely and train affected employees, so they are proficient in the use of that PPE, at no cost to those employees.
- Train affected employees to perform assigned rescue duties and ensure that such employees successfully complete the training required to establish proficiency as an authorized entrant.
- Train affected employees in basic first aid and cardiopulmonary resuscitation (CPR) and will ensure that at least one member of the rescue team or service holding a current certification in first aid and CPR is available.
- Ensure affected employees practice making permit space rescues at least once every 12 months, by means of simulated rescue operations in which they remove dummies, manikins or actual persons from the actual permit spaces or from representative permit spaces. Representative permit spaces will, with respect to opening size, configuration and accessibility, simulate the types of permit spaces where rescues may be performed.

### REVIEW

This policy will be reviewed annually and when measures may not protect employees, such as after any incidents or near misses. Any deficiencies will be corrected before entering any additional PRCS.

Some examples of situations that may require a review are:

- An unauthorized person enters a PRCS.
- A new hazard not covered by the permit is detected in a PRCS.
- A new condition prohibited by the permit is detected in a PRCS.
- An injury takes place during entry.
- A change in the PRCS configuration or use.
- An employee issues a complaint.

The annual review will ensure that all cancelled permits are included in the review within one (1) year after entry. This review will evaluate the policy's effectiveness of providing protection to all affected employees.

### FORMS AND ATTACHMENTS

Evaluate the documents on the following pages along with their source material from the General Industry Regulation's appendixes and consider using them to implement and maintain your safety program.

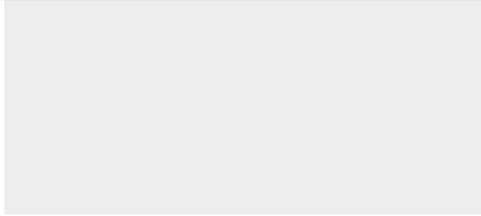
- Confined-Space Entry Permit
- Confined Space Entry Training Record Sheet
- Initial Evaluation of Confined Space Rescue Plans
- Evaluation of Confined Space Rescue Program
- Planning Confined Space Rescue Drills

Confined Spaces Entry Permit (1 of 3)

General Information					Controls and Equipment	
Permit Space Location:					<input type="checkbox"/> Isolation	
Purpose of Entry:					<input type="checkbox"/> Lockout/Tagout	
Permit Valid:	Date		Time		<input type="checkbox"/> Blanking/Blinding	
	From:	To:	From:	To:	<input type="checkbox"/> Double Block and Bleed	
Permit Space Hazards					Yes	No
ATMOSPHERIC	Oxygen Deficient			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Other:
	Oxygen Enriched			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Inerting
	Explosive (Gas/Vapor)			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Purge/Clean
	Explosive Dust			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Method for safe cover removal and securing area
	Carbon Monoxide			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Atmospheric Testing
	Hydrogen Sulfide			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Periodic (give interval):
	Other Toxic Vapors			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Continuous
Engulfment				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Ventilation
Configuration (entrapment)				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Natural
Mechanical				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Continuous Forced Air
Electrical				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Local Exhaust
Substance Hazard to Skin/Eyes				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Entry Equipment
Heat Stress				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Ladders
Other Potential Hazards (radiation, noise, etc.)				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Other:
						<input type="checkbox"/> Personal Protective Equipment
						<input type="checkbox"/> Respiratory (SCBA SAR, air purifying)
						<input type="checkbox"/> Clothing
						<input type="checkbox"/> Eye and Face Protection
						<input type="checkbox"/> Hearing Protection
						<input type="checkbox"/> Rescue and Retrieval Equipment
						<input type="checkbox"/> Full Body Harness
						<input type="checkbox"/> Lifeline
						<input type="checkbox"/> Tripod with Mechanical Wrench
						<input type="checkbox"/> Explosion Proof Lighting
						<input type="checkbox"/> Non-Sparking Tools
						<input type="checkbox"/> Safe Electrical Equipment and GFCI

# E & B OILFIELD SERVICES INC. HSE

		<input type="checkbox"/> Communication Equipment
		<input type="checkbox"/> Radio
		<input type="checkbox"/> Phone
		<input type="checkbox"/> Other:
		<input type="checkbox"/> Hot Work Permit
		<input type="checkbox"/> Fire Extinguishers



**Confined Spaces Entry Permit (2 of 3)**

Personnel	Name	Time In	Time Out
Entrants(s)			
Attendant(s)			
Entry Supervisor(s)			
<b>Communication Procedures</b>			
<input type="checkbox"/> Visual	<input type="checkbox"/> Voice	<input type="checkbox"/> Rope	<input type="checkbox"/> Radio <input type="checkbox"/> Other
<b>Rescue and Emergency Services</b>			
Name		Phone	
Name		Phone	
Rescue Procedure:			
Summoning Procedure:			



**Confined Spaces Entry Permit (3 of 3)**

Atmospheric Testing Record									
Condition	Acceptable Level	Record continuous monitoring results every 2 hours							
Oxygen	19.5% - 23%								
Explosive (Gas/Vapor)	<10% LFL								
Explosive Dust	<LFL (5ft visibility)								
Carbon Monoxide	50ppm								
Hydrogen Sulfide	10ppm								
Other (Specify):									
Other (Specify):									
Name(s) of Tester(s)									
Testing Equipment	Type	Serial #							
<b>Entry Authorized by:</b>							<b>Date:</b>	<b>Time:</b>	
Signature:									
<b>Entry Suspended by:</b>							<b>Date:</b>	<b>Time:</b>	
Signature:									
Resumed after Reevaluation:									
Description:									
<b>Entry Cancelled by:</b>							<b>Date:</b>	<b>Time:</b>	
Name:									
Signature:									
<b>Reason for Cancellation:</b>			<input type="checkbox"/> Entry Operations Completed			<input type="checkbox"/> Prohibited Condition Arose			
Problems Encountered:									



**Rescue and Emergency Services**

Name:		Trainer:		Date:	Certified <input type="checkbox"/> Y <input type="checkbox"/> N	
Rescue Duties:				Rescue Practice Date		
<b>Training</b>	First Aid:					
	CPR:					
Rescue Equipment and PPE Authorized for Use:						
Rescue Practice Session Description:						

Name:		Trainer:		Date:	Certified <input type="checkbox"/> Y <input type="checkbox"/> N	
Rescue Duties:				Rescue Practice Date		
<b>Training</b>	First Aid:					
	CPR:					
Rescue Equipment and PPE Authorized for Use:						
Rescue Practice Session Description:						

Name:		Trainer:		Date:	Certified <input type="checkbox"/> Y <input type="checkbox"/> N	
Rescue Duties:				Rescue Practice Date		
<b>Training</b>	First Aid:					
	CPR:					
Rescue Equipment and PPE Authorized for Use:						
Rescue Practice Session Description:						





