



Permit Required Confined Space  
Uchiyama Manufacturing America LLC.

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

### **Uchiyama MFG America LLC Company Policy**

The purpose of this program is to inform interested persons, including employees, that Uchiyama Manufacturing America LLC. is complying with the OSHA Confined Space Standard, Title 29 Code of Federal Regulations 1910.146. We have determined that **Employees of UMA will not enter Permit Required Confined Space** and will contract out all jobs that require entry into PRCS. We have also determined that the workplace still has the need for written procedures for the evaluation of confined spaces, and where permit-required spaces are identified, we have developed and implemented a permit-required confined space entry program for use in conjunction with contracted employees. This program applies to all work operations at Uchiyama Manufacturing America LLC. where Contracted workers must enter a permit-required confined space as part of their job duties

The PESM has overall responsibility for coordinating safety and health programs in this company. The PESM/Asst is the person having overall responsibility for the Permit-Required Confined Space Program and will review and update the program, as necessary.

Copies of the written program may be obtained from PESM/Asst and in each Department Computer.

Under this program, we identify all confined spaces to include permit-required spaces at Uchiyama Manufacturing America LLC., and provide training for our employees according to their responsibilities in the permit space. All UMA employees receive instructions that NO Entry into a Permit Required Confined Space is authorized by any UMA Employee. Contractors must provide proof of training for PRCS for safe entry into our specific type of confined spaces, including testing and monitoring, appropriate personal protective equipment, rescue procedures, and attendant responsibilities.

This program is designed to ensure that safe work practices are utilized during all activities regarding the permit space to prevent personal injuries and illnesses that could occur.

If, after reading this program, you find that improvements can be made, please contact the PESM/Asst. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective permit-required confined space entry program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

### **Hazard Evaluation for Permit Spaces**

To determine if there are permit-required confined spaces in Uchiyama Manufacturing America LLC., The PESM/Asst has conducted a hazard evaluation of our workplace. This evaluation has provided us with the information necessary to identify the existence and location of permit-required confined spaces in our workplace that must be covered by the Permit-Required Confined Space Entry Program. This written hazard evaluation is kept in the PESM department computer under Safety Data/Confined Space. Appendix A is an example of the evaluation.

## **Preventing Unauthorized Entry**

To provide a safe work environment and to prevent exposed employees from accidentally entering a permit space, we have implemented the following procedures to inform all employees of the existence, location, and danger posed by permit spaces in Uchiyama Manufacturing America LLC. To inform employees of the existence of a permit space, we use a sign reading "DANGER - PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER". To ensure that unauthorized employees do not enter and work in permit spaces, we have decided that UMA employees will not enter permit spaces and has taken effective measures to prevent its employees from entering the permit spaces. UMA will comply with 29 CFR 1910.146 paragraphs (c)(1), (c)(2), (c)(6), and (c)(8).

## **Safe Permit Space Entry Procedures**

The contracted entry supervisor is responsible for authorizing entry and issuing the entry permits. This person (such as the employer, foreman, or crew chief) is responsible for:

Determining if acceptable entry conditions are present at a permit space where entry is planned,

- \* Authorizing entry and overseeing entry operations, and

- \* Terminating entry as required. The Entry Supervisor (in coordination with the PESM/Asst) is responsible for authorizing entry and issuing entry permits for work in our permit spaces. The file of permits and related documents are kept in Confined Space folder on the Safety Computer.

## **Pre-Entry Evaluation**

To ensure the safety and health of contracted employees, before allowing authorized workers to enter a permit space, we evaluate conditions in that space to determine if the conditions are safe for entry. Any employee who enters the space, or that employee's authorized representative, has the opportunity to observe the pre-entry and any subsequent testing. The authorized entrant or that employee's representative also has the option of requesting a reevaluation of the space if they feel that the evaluation was not adequate.

### *Alternate Entry Evaluation*

Our company shall ensure all contractors follow the procedures to evaluate each permit space before entry according to 1910.146(c)(5)(ii)(C). This includes testing the internal atmosphere with a calibrated direct-reading instrument for oxygen content, flammable gases and vapors, and potential toxic air contaminants. They shall also periodically test the atmosphere of the space to ensure that the continuous ventilation is preventing the accumulation of a hazardous atmosphere.

## **Certification**

### *Alternate Entry Procedure Certification*

According to 1910.146(c)(5)(ii)(H), contractors shall verify that the space is safe for entry and that the pre-entry measures required by 1910.146(c)(5)(ii) have been taken, through a written certification that contains the date, location of the space, and signature of the person providing the certification. At UMA the PESM/Asst. in conjunction with the contractor is responsible for verifying these procedures. The certification is made before entry and is available to each employee entering the space.

### *Reclassification as Non-Permit Space Certification*

According to 1910.146(c)(7)(iii), All contractors performing PRCS entry shall document the basis for determining that all hazards in a permit space have been eliminated, through a certification that contains the date, location of the space, and signature of the person making the determination. At UMA the PESM/Asst. in conjunction with the contractor is responsible for documenting this information. The certification is available to each employee entering the space.

## **Equipment**

To ensure the safety and health of contracted employees, Contractors shall provide appropriate equipment to all employees who work in or near our permit spaces. According to 1910.146(k)(3)(i), each authorized entrant will use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, above the entrant's head, or at another point which each contractor can establish presents a profile small enough for the successful removal of the entrant. Wristlets may be used instead of the chest or full body harness if contractors can demonstrate that the use of a chest or full body harness is infeasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative.

Contractors shall maintain all equipment in excellent working condition, train the entrants in the correct usage of this equipment, and ensure that all equipment, including that used for personal protection, is used properly.

Contractors may give their entry supervisor the responsibility of ensuring use of the appropriate equipment by all entrants to the confined space.

According to 29 CFR 1910.146(d)(4), the following equipment must be provided at no cost to employees, maintained properly, and used properly by employees:

- \* Testing and monitoring equipment needed to comply with 29 CFR 1910.146(d)(5) (evaluation of permit space condition requirements);
- \* Ventilating equipment needed to obtain acceptable entry conditions;
- \* Communications equipment necessary for compliance with 29 CFR 1910.146(h)(3) and (i)(5);
- \* Personal protective equipment insofar as feasible engineering and work practice controls do not adequately protect employees;
- \* Lighting equipment needed to enable employees to see well enough to work safely and to exit the space quickly in an emergency;
- \* Barriers and shields as required by 29 CFR 1910.146(d)(3)(v);

- \* Equipment, such as ladders, needed for safe ingress and egress by authorized entrants;
- \* Rescue and emergency equipment needed to comply with 29 CFR 1910.146(d)(9), except to the extent that the equipment is provided by rescue services; and
- \* Any other equipment necessary for safe entry into and rescue from permit spaces.

The above equipment is only the minimum requirement. Contractors may provide additional equipment.

#### **Duties: Authorized Entrants**

Contracted persons who have completed the training and are authorized to enter our permit spaces shall be assigned specific duties and responsibilities that they must perform when they work in the permit space.

Their duties and responsibilities are assigned by the contractor.

The elements covered in the training program for permit space attendants are provided by the contractor.

#### **Duties: Attendants**

Contracted persons who have completed the training and have been designated as permit space attendants are assigned specific duties and responsibilities that they must perform in permit space job duties.

Their duties and responsibilities are assigned by the contractor.

The elements covered in the training program for permit space attendants are provided by the contractor.

#### **Duties: Entry Supervisors**

Contracted persons who have completed the training and have been designated as permit space entry supervisors are assigned specific duties and responsibilities that they must perform in permit space job duties. Their duties and responsibilities are assigned by the contractor.

The elements covered in the training program for permit space attendants are provided by the contractor.

#### **Training Program**

Every employee for the contractor who faces the risk of confined space entry shall have been provided with training so that each designated employee acquires the understanding, knowledge and skills necessary for the safe performance of the duties assigned to them. Contractors shall conduct their own permit-required confined space training. The PESM/Asst shall receive a copy of all training related materials, documents, and signed certificates that shall be retained on the safety computer under safety data/confined space.

Contractors may use their own training format for training if all requirements are met. They must ensure new employees are always trained before their initial assignment of duties. When changes occur in permit-required confined space areas of our company, we shall inform contractors that are suspect to enter these areas. If we have reason to believe that an employee has deviated from a previously trained upon procedure or that their knowledge seems inadequate, contractors shall retrain to ensure that retention and competency is met.

Upon successful completion of training by the contractor for the permit-required confined space training program, each participant shall receive some type of certificate which they sign verifying that they understand the material presented, and that they will follow all company policies and procedures regarding permit space entry.

### **Rescue and Emergency Services**

Uchiyama Manufacturing America LLC. Contracts out all rescue services in the event of a permit space emergency. Contracted employees have been trained, at a minimum, to:

- Perform the assigned rescue duties;
- Correctly use personal protective equipment (PPE) required for the job;
- Establish proficiency as an authorized entrant, as provided by 1910.146(g) and (h); and
- Perform basic first-aid and cardiopulmonary resuscitation (CPR).

The contractor in conjunction with UMA PESM/Asst ensures that at least one member of the rescue team holds a current certification in first-aid and CPR, and that 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 from which rescue is to be performed.

Contractors conduct our rescue and emergency training.

### **Multiple Employer Entry Procedures**

When outside employers/contractors enter our facility to perform work in permit spaces, we coordinate entry and work operations following all the above procedures.

### **Post-Operation Procedures**

Upon termination of the permit, the contracted company shall provide UMA PESM/Asst a copy of the permit showing that the space is closed and the permit is cancelled with appropriate signatures. The contractor shall provide information concerning any situations found during the space entry that may have been an issue or could be in the future. In short, an after action report may be added to information and UMA should perform corrective actions as necessary.

## **Review-Procedures**

To ensure that all employees participating in entry operations are protected from permit space hazards, Uchiyama Manufacturing America LLC. reviews the Permit-Required Confined Space Entry Program on a regular basis. We use the retained canceled permits from the past 12 months within one year after each entry and revise the program as necessary. Uchiyama Manufacturing America LLC. performs 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 will be performed.

## **Enforcement**

Constant awareness of and respect for permit-required confined space entry hazards, and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this permit entry program.

## Appendix A

Confined Space Identification and Hazard Evaluation Form			
Date of Evaluation:		Confined space name or number:	
Evaluation completed by:		Permit required? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Section 1: Confined Space Identification and Location			
Location of space (e.g., site, area, room):			
Description of space (physical characteristics, configuration, number of entry points, etc..)			
Person in charge of space or responsible individual:			
Is this a confined space? <input type="checkbox"/> Yes <input type="checkbox"/> No  (If the answer to question 1, 2, and 3 are "YES" then the space is a confined space. If YES, complete Section 2 and 3. If NO, consult other applicable OSHA standards and guidelines.)	1. The space can be entered?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	2. The space has limited or restricted entry and exit?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	3. Is this space not designed for human occupancy?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Section 2: Confined Space Hazard Assessment (potential and existing hazards)			
Are there any condition making it unsafe to remove an entrance cover?		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes describe: _____			
Note: These conditions must be eliminated before the cover is removed			
Atmospheric Hazards			
<input type="checkbox"/> Oxygen deficiency (less than 19.5% oxygen).	Monitoring results:		
<input type="checkbox"/> Oxygen enrichment (more than 23.5% oxygen).	Monitoring results:		
<input type="checkbox"/> Flammable gas, vapor, or mist greater than 10% of its LFL	Substance:		
	Monitoring results:		
<input type="checkbox"/> Combustible dust greater than or equal to its LFL (when dust obscures vision at a distance of 5 feet or less)	Monitoring results or visual determination:		
	Substance:		
<input type="checkbox"/> Toxic gas, vapor, or mist in excess of its PEL, TLV, or other recommended guidelines.	Substance(s):		
	Monitoring results:		
<input type="checkbox"/> Inert or oxygen displacement atmosphere; simple asphyxiant. If yes, specify gas: _____ (Examples include acetylene, argon, carbon dioxide, ethylene, helium, hydrogen, LPG, methane, neon, nitrogen, and propane. Note that some of these gases are flammable/explosive or have exposure limits (PELs or TLVs))			
<input type="checkbox"/> Poor or inadequate ventilation. Explain: _____			
<input type="checkbox"/> Any other atmospheric condition that is immediately dangerous to life or health. Explain: _____			
Atmospheric hazards summary statement/comments:			



**Possible Energy Sources Requiring Lockout/Tagout:**

- ☐ Electrical    ☐ Mechanical    ☐ Hydraulic    ☐ Pneumatic    ☐ Chemical  
☐ Thermal    ☐ Radioactive    ☐ Gravity (falling objects)

Comments/survey results:

**Introduction of Hazardous Materials? If yes, explain:****Possible Content Hazards (e.g., engulfment)? If yes, explain:****Configuration of Space?**

- ☐ Inwardly converging walls    ☐ Downward sloping and tapering floor    ☐ Drop Offs  
☐ Low overhead clearance    ☐ Complex Layout    ☐ Unstable or structural Integrity Issues

Comments/survey results:

**Other Hazards in the Space?**

- ☐ Slip/trip/fall hazards    ☐ Ambient temperature high or low    ☐ Surface temperatures high or low  
☐ Noise    ☐ Vibration (localized/whole body)    ☐ Ionizing or non-ionizing radiation  
☐ Plants    ☐ Microorganisms    ☐ Rodents, snakes, and other insects  
☐ Other (explain) \_\_\_\_\_

Comments/survey results:

**Section 3: Permit-Required Confined Space Determination**

Is the confined space a permit-required space (PRCS)?

Yes ☐

No ☐

*If the answer to questions 1, 2, 3, or 4 are "YES," then the space is a PRCS. If YES, complete the rest of Section 3 and post an appropriate danger sign per at the entrance to the space. If NO, the space is a non-permit confined space. Complete section 5 if entry is required.*

1. Atmospheric hazard(s)?

Yes ☐

No ☐

2. Potential for engulfment?

Yes ☐

No ☐

3. Internalized configuration hazard?

Yes ☐

No ☐

4. Other serious safety hazard?

Yes ☐

No ☐

Will the PRCS be entered by any personnel?

Yes ☐

No ☐

If no, what measures have been taken to prevent entry?

- ☐ Posted danger signs  
☐ Blocked, barricaded, or locked entrance  
☐ Informed exposed employees

**If yes, complete a PRCS entry permit for all entries.**

☐ Self-rescue      ☐ Non-entry vertical rescue      ☐ Non-entry horizontal rescue      ☐ Entry rescue

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The OSHA Confined Space standard allows a PCRS to be entered without the need for a written permit or an attendant under two conditions

- The only hazard in the PCRS is an atmospheric hazard and the PCRS can be **maintained** in a condition safe for entry by using mechanical ventilation alone.
- All hazards within the PCRS have been **eliminated** and the space has been reclassified as a non-permit confined space.

1. Is the only hazard an actual/potential atmospheric hazard that can be safely controlled by continuous forced air ventilation alone? ☐ Yes ☐ No

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If entry will occur, **certify** that the space is safe for entry and that the appropriate pre-entry measures have been taken according to the requirements

If no, the space must be entered using s PRCS entry permit and attendant.

(Note: If an initial entry of the PRCS is necessary to obtain the required air monitoring data, the entry must be performed utilizing a PRCS entry permit and attendant.)

2. Can the PCRS be reclassified as a non-permit space (i.e., there are no actual/potential atmospheric hazards and ALL hazards within the space are eliminated without entry into the space)?

☐ Yes      ☐ No

If yes, **certify** that all hazards within the space have been eliminated according to the requirements of.

If no, /the space must be entered using a PRCS entry permit and attendant.

### Section 5: Non-permit Confined Space Entry

No action is necessary for non-permit confined spaces unless personnel are entering non-permit spaces and there are changes within these spaces that may increase or create a hazard to entrants. If such a situation occurs, the space must be reevaluated, and if necessary, reclassified as a PRCS.

If personnel will enter this non-permit confined space, complete the following and post at the entrance to the space:

Date: \_\_\_\_\_

Location of space: \_\_\_\_\_

The following conditions and precautions are required for safe entry into this non-permit confined space:

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The following changes within this non-permit confined space constitute a "change in conditions" and require a re-evaluation of the space prior to entry:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

**In all cases, if hazards arise during non-permit confined space entry, all personnel must leave the space immediately. Confined spaces must re-evaluate whenever there are changes in use or configuration of the space or when hazards change or arise.**

Signature of certifying individual: \_\_\_\_\_

***Note: Retain this form in site files for the confined space safety program evaluation***