



Confined Space Entry (Permit-Required) Plan

PURPOSE:

The purpose of this program is to inform interested persons, including employees, Bel Brands USA is complying with the OSHA Confined Space Standard, Title 29 Code of Federal Regulations 1910.146. We have determined this workplace needs 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. This program applies to all work operations at Bel Brands USA where employees must bodily enter a permit-required confined space as part of their job duties.

SCOPE:

Under this program, we identify permit-required spaces in Bel Brands USA, and provide training for our employees according to their responsibilities in the permit-required confined spaces. These employees receive instructions 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 safe work practices are utilized during all activities regarding the permit-required confined space to prevent personal injuries and illnesses that could occur.

RESPONSIBILITIES:

The HR Manager (or designee) will have overall responsibility for coordinating safety and health programs at the Bel Brands USA Little Chute facility. The Maintenance Supervisor is the person having overall responsibility for the Permit-Required Confined Space Program. The HR Manager and/or Maintenance Supervisor will review and update the program, as necessary. Copies of the written program may be obtained from the Maintenance Supervisor and/or the Human Resources Department.

If, after reading this program, you find improvements can be made, please contact the HR Manager or the Maintenance Supervisor. 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.

PROCEDURES:

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No entry into any confined spaces is done while affected employees (an employee who normally works on or near the machine or area that requires maintenance) are present. Either these are done after hours or the entire area is evacuated of affected employees.

Determination of Non-Permit or Permit-Required

A *permit-required confined space* has one or more of the following characteristics:

- (1) Contains or has a potential to contain a hazardous atmosphere;
- (2) Contains a 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; or
- (4) Contains any other recognized serious safety or health hazard.

A *non-permit confined space* has **none** of the characteristics listed above **at any time**.

A permit-required confined space may be temporarily reclassified as a non-permit confined space under the following procedures:

- (1) If the permit space poses no actual or potential atmospheric hazards and if **all** hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated.
- (2) If it is necessary to enter the permit space to eliminate hazards, such entry must be performed under paragraphs 1910.146 (d) through 1910.146(k). If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated, the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated.
- (3) The employer must document the basis for determining that all hazards in a permit-required confined space have been eliminated, through a certification that contains the date, the location of the space, and the signature of the person making the determination. The certification must be made available to each employee entering the space or to that employee's authorized representative.
- (4) If hazards arise within a permit space that has been declassified to a non-permit confined space, each employee in the space must exit the space. The employer must then reevaluate the space and determine whether it must be reclassified as a permit space.

See [Q3LCM034 Confined Space Inventory Template](#) for the listings of all confined spaces.

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Hazard Evaluation for Permit Spaces

To determine if there are permit-required confined spaces in Bel Brands USA, the Maintenance Supervisor 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.

Preventing Unauthorized Entry

To provide a safe work environment and to prevent 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 Bel Brands USA. To inform employees of the existence of a permit space, we post danger signs. To ensure that unauthorized employees do not enter and work in permit spaces, we post danger signs and lock the doors leading immediately to such space.

Safe Permit Space Entry Procedures

The Maintenance Supervisor (or a designee) will be the Entry Supervisor responsible for authorizing entry and issuing entry permits for work in our permit spaces. The file of permits and related documents are kept in the Maintenance. The procedures we follow for preparing, issuing, and canceling entry permits includes the following elements:

- (1) Before entry is authorized, the employer shall document the completion of measures required by preparing an entry permit.
- (2) Before entry begins, the Entry Supervisor identified on the permit shall sign the entry permit to authorize entry.
- (3) The completed permit shall be made available at the time of entry to all authorized entrants or their authorized representatives, by posting it at the entry portal or by any other equally effective means, so the entrants can confirm pre-entry preparations have been completed.
- (4) The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.
- (5) The Entry Supervisor shall terminate entry and cancel the entry permit when:
 - a. The entry operations covered by the entry permit have been completed; or
 - b. A condition that is not allowed under the entry permit arises in or near the permit space.
- (6) The employer shall retain each canceled entry permit for at least 1 year to facilitate the review of the permit-required confined space program. Any problems encountered during an entry operation shall be noted on the pertinent permit so appropriate revisions to the permit space program can be made.

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Entry permit

The entry permit that documents compliance with this section and authorizes entry to a permit space shall identify:

- (1) The permit space to be entered;
- (2) The purpose of the entry;
- (3) The date and the authorized duration of the entry permit;
- (4) The authorized entrants within the permit space, by name or by such other means (for example, through the use of rosters or tracking systems) as will enable the attendant to determine quickly and accurately, for the duration of the permit, which authorized entrants are inside the permit space;
NOTE: This requirement may be met by inserting a reference on the entry permit as to the means used, such as a roster or tracking system, to keep track of the authorized entrants within the permit space.
- (5) The personnel, by name, currently serving as attendants;
- (6) The individual, by name, currently serving as Entry Supervisor, with a space for the signature or initials of the Entry Supervisor who originally authorized entry;
- (7) The hazards of the permit space to be entered;
- (8) The measures used to isolate the permit space and to eliminate or control permit space hazards before entry;
NOTE: Those measures can include the lockout or tagging of equipment and procedures for purging, entering, ventilating, and flushing permit spaces.
- (9) The acceptable entry conditions;
- (10) The results of initial and periodic tests performed, accompanied by the names or initials of the testers and by an indication of when the tests were performed;
- (11) The rescue and emergency services that can be summoned and the means (such as the equipment to use and the numbers to call) for summoning those services;
- (12) The communication procedures used by authorized entrants and attendants to maintain contact during the entry;
- (13) Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided for compliance with this section;
- (14) Any other information whose inclusion is necessary, given the circumstances of the particular confined space, in order to ensure employee safety; and
- (15) Any additional permits, such as for hot work, that have been issued to authorize work in the permit space.

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All Maintenance personnel have current authorization to work in or near our permit spaces. The Maintenance Coordinator will scan and save copies of the entry permits and maintain for a minimum of 3 years.

Pre-Entry Evaluation

To ensure the safety and health of our employees, before allowing authorized workers to enter a permit-required confined 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 the evaluation was not adequate.

Alternate Entry Evaluation

Our company follows 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. We also periodically test the atmosphere of the space to ensure that the continuous ventilation is preventing the accumulation of a hazardous atmosphere.

Equipment

To ensure the safety and health of our employees, Bel Brands USA provides 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 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 Bel Brands USA 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 Bel Brands USA can demonstrate the use of a chest or full body harness is infeasible or creates a greater hazard and the use of wristlets is the safest and most effective alternative. We provide the following additional equipment to all employees who work in or near our permit spaces:

- 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);

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- 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.

We maintain all equipment in excellent working condition, train the entrants in the correct usage of this equipment, and ensure all equipment, including that used for personal protection, is used properly. We follow these procedures to ensure the appropriate equipment is being used by entrants.

Duties: Authorized Entrants

Those persons who have completed the training and are authorized to enter our permit spaces (authorized entrants) are assigned specific duties and responsibilities they must perform when they work in the permit space. Their duties and responsibilities, and the elements covered in the training programs for authorized entrants include:

- (1) Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- (2) Properly use equipment as required;
- (3) Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space;
- (4) Alert the attendant whenever:
 - a. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or
 - b. The entrant detects a prohibited condition; and
- (5) Exit from the permit space as quickly as possible whenever:
 - a. An order to evacuate is given by the attendant or the Entry Supervisor,
 - b. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation,
 - c. The entrant detects a prohibited condition, or
 - d. An evacuation alarm is activated.

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Duties: Attendants

Those persons who have completed the training and have been designated as permit space attendants are assigned specific duties and responsibilities they must perform in permit space job duties. Their duties and responsibilities, and the elements covered in the training program for permit space attendants include:

- (1) Knowing the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- (2) Being aware of possible behavioral effects of hazard exposure in authorized entrants;
- (3) Continuously maintaining an accurate count of authorized entrants in the permit space and ensuring that the means used to identify authorized entrants accurately identifies who is in the permit space;
- (4) Remaining outside the permit space during entry operations until relieved by another attendant;
NOTE: When the employer's permit entry program allows attendant entry for rescue, attendants may enter a permit space to attempt a rescue if they have been trained and equipped for rescue operations and if they have been relieved.
- (5) Communicating with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space;
- (6) Monitoring activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions;
 - a. If the attendant detects a prohibited condition;
 - b. If the attendant detects the behavioral effects of hazard exposure in an authorized entrant;
 - c. If the attendant detects a situation outside the space that could endanger the authorized entrants; or
 - d. If the attendant cannot effectively and safely perform all the duties required;
- (7) Summoning rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards;
- (8) Taking the following actions when unauthorized persons approach or enter a permit space while entry is underway:
 - a. Warn the unauthorized persons that they must stay away from the permit space;
 - b. Advise the unauthorized persons that they must exit immediately if they have entered the permit space; and
 - c. Inform the authorized entrants and the Entry Supervisor if unauthorized persons have entered the permit space;

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- (9) Performing non-entry rescues, for which they must be certified in First Aid/CPR/AED (see [Q3LCJ032 First Aid Program](#)); and
- (10) Performing no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

Duties: Entry Supervisors

Those 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, and the elements covered in the training program for permit space Entry Supervisors include:

- (1) Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- (2) Verifies, by checking the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin;
- (3) Terminates the entry and cancels the permit as required;
- (4) Verifies rescue services are available and the means for summoning them are operable;
- (5) Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations; and
- (6) Determines, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

Training Program

Every employee at Bel Brands USA who faces the risk of confined space entry is provided with training so each designated employee acquires the understanding, knowledge and skills necessary for the safe performance of the duties assigned to them. The Maintenance Supervisor in conjunction with Human Resources, will conduct our permit-required confined space training. All training related materials, documents, and training records are kept in Human Resources Department.

When we conduct the training, we use classroom training and demonstration. New employees are always trained before their initial assignment of duties. When changes occur in permit-required confined space areas of our company, we provide training. If we have reason to believe an employee

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has deviated from a previously trained upon procedure or their knowledge seems inadequate, we provide training. Refresher training occurs annually

Upon successful completion of Bel Brands USA permit-required confined space training program, each participant's attendance at training will be documented and they will be asked to attest to their understanding and agreement to follow all company policies and procedures regarding permit space entry.

Entry Rescue and Emergency Services

Bel Brands USA utilizes emergency services (**9-911**) to perform entry rescue and emergency services in the event of a permit space incident. We will inform the rescue team of the hazards they may confront when called on to perform rescues at the site. An Authorized Entrant with First Aid/CPR/AED certification may perform a non-entry rescue.

Multiple Employer Entry Procedures

When outside employers/contractors enter our facility to perform work in permit spaces, we coordinate entry and work operations following these procedures:

- Inform the contractor the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section;
- Apprise the contractor of the elements, including the hazards identified and the host employer's experience with the space, that make the space in question a permit space;
- Apprise the contractor of any precautions or procedures the host employer has implemented for the protection of employees in or near permit spaces where contractor personnel will be working;
- Coordinate entry operations with the contractor, when both host employer personnel and contractor personnel will be working in or near permit spaces, as required; and
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations.
- In addition to complying with the permit space requirements that apply to all employers, each contractor who is retained to perform permit space entry operations shall:
 - Obtain any available information regarding permit space hazards and entry operations from the host employer;

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- Coordinate entry operations with the host employer, when both host employer personnel and contractor personnel will be working in or near permit spaces; and
- Inform the host employer of the permit space program the contractor will follow and of any hazards confronted or created in permit spaces, either through a debriefing or during the entry operation.

Post-operations Procedures

Upon completion of work in a permit space, we follow close off the space and cancel the permit.

Review Procedures

To ensure all employees participating in entry operations are protected from permit space hazards, Bel Brands USA 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. A review of the specific permit-required confined space entry procedures is done annually, and is managed through SAP on a PM.

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 Maintenance and Human Resources Departments 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

We have attached to this plan a copy of the [Q3LCJ020 Confined Space Entry Permit](#) and posted OSHA Confined Space Entry Quickcards (located at <https://www.osha.gov/pls/publications/publication.athruz?pType=Types&pID=6>) which we thought would ensure better understanding of our written program.

Maintenance maintains [Q3LCJ021 Confined Space – Entry Procedures Manual](#) of specific confined space entry procedures. This manual is in a hardcopy binder in the Production Supervisors' office and electronically on KII.

[Q3LCM034 Confined Space Inventory Template](#)

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| 2 | Whole Document | Format Change | 02/28/12 |
| 3 | Whole Document | HR Personnel Replacement | 12/28/12 |
| 4 | Procedures | Definition of “affected employees” added | 04/22/14 |
| 5 | Whole Document | Name removal | 01/19/15 |
| 6 | Whole Document | Job title update | 05/06/15 |
| 7 | Procedures | Updates to Training procedures | 05/18/15 |
| 8 | Entry Rescue & Emergency Services | Clarified emergency services & entry rescue requirements | 06/19/15 |
| 9 | Responsibilities | Contractor info added | 06/30/15 |
| 10 | Procedures | Added what is covered via PM | 06/30/15 |
| 11 | Appendix | Added Q3LCJ021 Confined Space – Entry Procedures Manual | 07/15/15 |

Document Distribution

| Location | Number of copies |
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