	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 1 of 14

## Purpose

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The purpose of this program is to inform interested persons, including employees that Trinity Medical Management ("Trinity") is complying with the OSHA Confined Space Standard. We have determined that 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 Trinity where employees must enter a permit-required confined space as part of their job duties.

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

## Administrative Duties

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The Operations Manager (OM) is the person having overall responsibility for the Permit-Required Confined Space Program. Operations will review and update the program, as necessary. Copies of the written program may be obtained from the Operations Manager's office.

If, after reading this program, you find that improvements can be made, please contact the Operations Manager. 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.

## Definitions

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"Acceptable entry conditions" means the conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter into and work within the space.

"Attendant" means an individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit space program.

"Authorized entrant" means an employee who is authorized by the employer to enter a permit space.

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 2 of 14

"Blanking or blinding" means the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

"Confined space" means a space that:

1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and
2. Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and
3. Is not designed for continuous employee occupancy.

"Double block and bleed" means the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

"Emergency" means any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.

"Engulfment" means the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

"Entry" means the action by which a person passes through an opening into a permit-required confined space. Entry includes ensuing 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.

"Entry permit (permit)" means the written or printed document that is provided by the employer to allow and control entry into a permit space and that contains the information specified in paragraph (f) of this section.

"Entry supervisor" means the 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 by this section.

NOTE: An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of entry supervisor may be passed from one individual to another during the course of an entry operation.

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 3 of 14

"Hazardous atmosphere" means an atmosphere that may expose employees to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:

1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL);
2. Airborne combustible dust at a concentration that meets or exceeds its LFL;  
NOTE: This concentration may be approximated as a condition in which the dust obscures vision at a distance of 5 feet (1.52 m) or less.

3. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
4. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart G, Occupational Health and Environmental Control, or in Subpart Z, Toxic and Hazardous Substances, of this Part and which could result in employee exposure in excess of its dose or permissible exposure limit;

NOTE: An atmospheric concentration of any substance that is not capable of causing death, incapacitation, impairment of ability to self-rescue, injury, or acute illness due to its health effects is not covered by this provision.

5. Any other atmospheric condition that is immediately dangerous to life or health.  
NOTE: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets that comply with the Hazard Communication Standard, section 1910.1200 of this Part, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

"Hot work permit" means the employer's written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.


"Immediately dangerous to life or health (IDLH)" means any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.

NOTE: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately" dangerous to life or health.

"Inerting" means 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 noncombustible.

NOTE: This procedure produces an IDLH oxygen-deficient atmosphere.

"Isolation" means 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

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 4 of 14

system; lockout or tagout of all sources of energy; or blocking or disconnecting all mechanical linkages.

"Line breaking" means the intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

"Non-permit confined space" means a confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

"Oxygen deficient atmosphere" means an atmosphere containing less than 19.5 percent oxygen by volume.

"Oxygen enriched atmosphere" means an atmosphere containing more than 23.5 percent oxygen by volume.

"Permit-required confined space (permit space)" means a confined space that 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.

"Permit-required confined space program (permit space program)" means the employer's overall program for controlling, and, where appropriate, for protecting employees from, permit space hazards and for regulating employee entry into permit spaces.


"Permit system" means the employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry.

"Prohibited condition" means any condition in a permit space that is not allowed by the permit during the period when entry is authorized.

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

"Retrieval system" means the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

"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.

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 5 of 14

NOTE: Testing enables employers both to devise and implement adequate control measures for the protection of authorized entrants and to determine if acceptable entry conditions are present immediately prior to, and during, entry.

## **Hazard Evaluation for Permit Spaces**

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To determine if there are permit-required confined spaces on Trinity projects, The Remote Duty Paramedic or HSE Technician has conducted hazard evaluations of the 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 Trinity office.

## **Permit-Required Confined Space Entry – Employee Protection**

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To ensure the safety of employees involved in permit-required confined space entry Trinity will:

1. Implement the measures necessary to prevent unauthorized entry;
2. Identify and evaluate the hazards of permit spaces before employees enter them;
3. Develop and implement the means, procedures, and practices necessary for safe permit space entry operations, including, but not limited to, the following:
  - a. Specifying acceptable entry conditions;
  - b. Providing each authorized entrant or that employee's authorized representative with the opportunity to observe any monitoring or testing of permit spaces;
  - c. Isolating the permit space;
  - d. Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards;
  - e. Providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards; and
  - f. Verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
4. Provide the following equipment as required by the applicable OSHA standard(s) at no cost to employees, maintain that equipment properly, and ensure that employees use that equipment properly:
  - a. Testing and monitoring equipment needed to comply with the applicable OSHA standard(s);
  - b. Ventilating equipment needed to obtain acceptable entry conditions;
  - c. Communications equipment necessary for compliance with the applicable OSHA standard(s);
  - d. Personal protective equipment insofar as feasible engineering and work practice controls do not adequately protect employees;
  - e. Lighting equipment needed to enable employees to see well enough to work safely and to exit the space quickly in an emergency;
  - f. Barriers and shields as required by the applicable OSHA standard(s);



	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 6 of 14

- g. Equipment, such as ladders, needed for safe ingress and egress by authorized entrants;
- h. Rescue and emergency equipment needed to comply with applicable OSHA standards, except to the extent that the equipment is provided by rescue services; and
- i. Any other equipment necessary for safe entry into and rescue from permit spaces.
5. Evaluate permit space conditions as follows when entry operations are conducted:
  - a. Test conditions in the permit space to determine if acceptable entry conditions exist before entry is authorized to begin, except that, if isolation of the space is infeasible because the space is large or is part of a continuous system (such as a sewer), pre-entry testing will be performed to the extent feasible before entry is authorized and, if entry is authorized, entry conditions will be continuously monitored in the areas where authorized entrants are working;
  - b. Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations; and
  - c. When testing for atmospheric hazards, test first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors.
6. Trinity provides each authorized entrant or that employee's authorized representative an opportunity to observe the pre-entry and any subsequent testing or monitoring of permit spaces;
7. Reevaluate the permit space in the presence of any authorized entrant or that employee's authorized representative who requests that the employer conduct such reevaluation because the entrant or representative has reason to believe that the evaluation of that space may not have been adequate;
8. Immediately provide each authorized entrant or that employee's authorized representative with the results of any testing conducted in accord with applicable OSHA standards.

### **Preventing Unauthorized Entry**

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To provide a safe work environment and to prevent exposed employees from accidentally entering a permit space, we post danger signs to inform all employees of the existence, location, and danger posed by permit spaces at Trinity.

**DANGER - PERMIT-REQUIRED CONFINED SPACE  
DO NOT ENTER**

### **Safe Permit Space Entry Procedures**

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The Entry Supervisor 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 the Operations office. The procedures we follow for preparing, issuing, and canceling entry permits includes the following elements:

- Permit System

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 7 of 14

- Before entry is authorized, Trinity will document the completion of measures required by OSHA regulations by preparing an entry permit.
- Before entry begins, the entry supervisor identified on the permit will sign the entry permit to authorize entry.
- The completed permit will 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 that the entrants can confirm that pre-entry preparations have been completed.
- The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit in accordance with OSHA regulations.
- The entry supervisor will terminate entry and cancel the entry permit when:
  - The entry operations covered by the entry permit have been completed; or
  - A condition that is not allowed under the entry permit arises in or near the permit space.
- Trinity will retain each canceled entry permit for at least 1 year to facilitate the review of the permit-required confined space program required by OSHA regulations. Any problems encountered during an entry operation will be noted on the pertinent permit so that appropriate revisions to the permit space program can be made.

## Entry Permit

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

- The permit space to be entered;
- The purpose of the entry;
- The date and the authorized duration of the entry permit;
- The authorized entrants within the permit space;
- The personnel, by name, currently serving as attendants;
- 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;
- The hazards of the permit space to be entered;
- 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, inerting, ventilating, and flushing permit spaces.
- The acceptable entry conditions;
- The results of initial and periodic tests performed under OSHA regulations, accompanied by the names or initials of the testers and by an indication of when the tests were performed;
- 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;
- The communication procedures used by authorized entrants and attendants to maintain contact during the entry;

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 8 of 14

- Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided for compliance with this section;
- Any other information whose inclusion is necessary, given the circumstances of the particular confined space, in order to ensure employee safety; and
- Any additional permits, such as for hot work, that have been issued to authorize work in the permit space.

## Pre-Entry Evaluation

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To ensure the safety and health of our 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.

Our company follows the procedures to evaluate each permit space before entry according to OSHA regulations. 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.

The confined space can be re-evaluated if there is reason to believe changes have occurred. In addition, employees or their representatives are entitled to request additional monitoring at any time.

## Certification

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Our company verifies that the space is safe for entry and that the pre-entry measures required by OSHA regulations have been taken, through a written certification that contains the date, location of the space, and signature of the person providing the certification. At Trinity, the Operations Manager is responsible for verifying these procedures. The certification is made before entry and is available to each employee entering the space.

## Equipment

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To ensure the safety and health of our employees, Trinity provides appropriate equipment to all employees who work in or near our permit spaces. 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 Trinity 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 Trinity can demonstrate that the use of a chest or full body harness



	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 9 of 14


is infeasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative.

We 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.

## **Duties & Responsibilities**

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- 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 that they must perform when they work in the permit space.
  - Trinity trains each authorized entrant so that they have an understanding, knowledge, and the skills necessary to safely perform their duties and responsibilities.
  - Their duties and responsibilities include:
    - Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
    - Properly use equipment as required by OSHA regulations;
    - 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 as required by OSHA regulations;
    - Alert the attendant whenever:
      - The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or
      - The entrant detects a prohibited condition; and
    - Exit from the permit space as quickly as possible whenever:
      - An order to evacuate is given by the attendant or the entry supervisor,
      - The entrant recognizes any warning sign or symptom of exposure to a dangerous situation,
      - The entrant detects a prohibited condition, or
      - An evacuation alarm is activated.
- Attendants
  - Persons who have been designated as permit space attendants are assigned specific duties and responsibilities that they must perform in permit space job duties. Trinity trains each attendant so that they have an understanding, knowledge, and the skills necessary to safely perform their duties and responsibilities.
  - Their duties and responsibilities include:
    - Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 10 of 14

- Is aware of possible behavioral effects of hazard exposure in authorized entrants;
- Continuously maintains an accurate count of authorized entrants in the permit space and ensures that the means used to identify authorized entrants accurately identifies who is in the permit space;
- Remains outside the permit space during entry operations until relieved by another attendant;
  - NOTE: When Trinity'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 as required by applicable OSHA regulations.
- Communicates with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space;
- Monitors 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:
  - If the attendant detects a prohibited condition;
  - If the attendant detects the behavioral effects of hazard exposure in an authorized entrant;
  - If the attendant detects a situation outside the space that could endanger the authorized entrants; or
  - If the attendant cannot effectively and safely perform all the duties required under applicable OSHA regulations;
- 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 the following actions when unauthorized persons approach or enter a permit space while entry is underway:
  - Warn the unauthorized persons that they must stay away from the permit space;
  - Advise the unauthorized persons that they must exit immediately if they have entered the permit space; and
  - Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space;
- Performs non-entry rescues as specified by Trinity's rescue procedure; and
- Performs no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.
- In the event of an emergency when more than one confined space is being monitored by a single attendant, the attendant will order all entrants out of the unaffected confined spaces so that he/she will not be distracted from the emergency situation.
- Entry Supervisors
  - Those persons who have completed the training and have been designated as permit space entry supervisors are assigned specific duties and responsibilities

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 11 of 14

that they must perform in permit space job duties. Trinity trains each entry supervisor so that they have an understanding, knowledge, and the skills necessary to safely perform their duties and responsibilities.

- Their duties and responsibilities include:
  - Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
  - Verifies, by checking that 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;
  - Terminates the entry and cancels the permit;
  - Verifies that rescue services are available and that the means for summoning them are operable;
  - Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations; and
  - 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.

### **Concluding the Entry**

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All equipment and materials will be removed from and around the confined space. The confined space will be closed off. All energy sources will be restored following the Trinity Lockout Tagout Program. All affected employees will be informed that the confined space entry is complete. The entry permit will then be closed out per OSHA regulations.


### **Training Program**

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Every employee at Trinity who faces the risk of confined space entry is 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. Each affected employee must be trained prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created or special deviations have occurred. The Training and Compliance Manager conducts our permit-required confined space training. All training related materials, documents, and signed certificates are kept in the Operations office.

We use the following criteria to determine which employees must receive permit-required confined space training:

- The area they work in;
- Whether or not any confined spaces exist in that area; and/or
- They will be required to enter a confined space or assist in confined space entry.

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 12 of 14

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 that an employee has deviated from a previously trained upon procedure or that their knowledge seems inadequate, we provide training.

The employer must certify that the required training has been accomplished. The certification will include employee name, trainer signature/initials, and dates of training. Certification must be made available to employees & their authorized representative.

Refresher training is conducted on an annual basis for all employees involved in Permit-Required Confined Space Entry.

### **Rescue and Emergency Services**

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If proper protective measures are taken to eliminate and control any possible hazards in the confined space (i.e., ventilation, purging, monitoring, lockout/tagout, etc.), rescue operations should not be necessary. Nonetheless, we must be prepared for the worst case scenario.

We have an Emergency Response Team that is trained and is responsible for rescue of persons in a confined space. This group of employees has 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; and
- Perform basic first-aid and cardiopulmonary resuscitation (CPR).

Any time an IDLH entry is conducted Rescue Services must be available at the worksite.

The attendant for the confined space will have access to a telephone and know the proper procedure for alerting the Emergency Response Team in the event of an emergency. He/she will ensure that no unauthorized personnel attempt a rescue.

In addition, if an injured entrant is exposed to a substance for which a Material Safety Data Sheet (MSDS) or other similar written information is required to be kept at the worksite, that MSDS or other written information must be made available to the medical facility treating the exposed entrant.

Provisions will be made and equipment provided to ensure timely extraction of an unconscious or injured worker from the confined space. This will include a body harness with a lifeline attached to a tripod and rescue winch. Under no circumstances is the attendant to enter the space to effect rescue; rescue operations must be left to trained Emergency Response Team personnel.

In addition, if an injured entrant is exposed to a substance for which a Material Safety Data Sheet (MSDS) or other similar written information is required to be kept at the worksite, that

	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 13 of 14

MSDS or other written information must be made available to the medical facility treating the exposed entrant.

Trinity also 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 are to be performed.

The Training and Compliance Manager conducts our rescue and emergency training.

### **Multiple Company Entry Procedures**

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

- Inform the contractor that 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 client's experience with the space, that make the space in question a permit space;
- Apprise the contractor of any precautions or procedures that the client 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 client personnel and contractor personnel will be working in or near permit spaces, as required by OSHA regulations; 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 Companies, each contractor who is retained to perform permit space entry operations will:
  - Obtain any available information regarding permit space hazards and entry operations from the client;
  - Coordinate entry operations with the client, when both client's personnel and contractor personnel will be working in or near permit spaces, as required by OSHA regulations; and
  - Inform the client of the permit space program that the contractor will follow and of any hazards confronted or created in permit spaces, either through a debriefing or during the entry operation.



	<b>PERMIT-REQUIRED CONFINED SPACES PROGRAM</b>	Document No.:	HSE-OP-002
		Department:	Operations
		Revision Date:	31 MAR 2010
Release authorized by:	D. Slattery	Page	Page 14 of 14

## Review-Procedures

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Entry operations that may not provide enough protection for employees will be reviewed and revised prior to subsequent entries being authorized.

To ensure that all employees participating in entry operations are protected from permit space hazards, Trinity 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. Trinity 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

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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 Managers in Operations and HSE 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.

## Additional State Requirements

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- Some states' regulations do not cover operations conducted in underwater devices. However, it does cover construction, agriculture, marine terminal, telecommunication, grain handling, natural gas utility, and electric utility operations.
- Fuels or gases cannot be taken into confined spaces.
- In vessels that held flammable liquids, disconnect lines that convey hazardous materials.
- If using an ignition source, empty the vessel and purge flammable vapors. Then test for flammability of vapors, and allow no source of ignition if the combustible vapor is greater than 25 percent of the LEL.
- Keep adequate fire extinguishing equipment close at hand.
- At least one standby person at the site needs to be trained and immediately available to perform rescue and emergency services.

## Attachments

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HSE-BF-005    CONFINED SPACE HAZARD ASSESSMENT  
HSE-BF-006    CONFINED SPACE ENTRY PERMIT  
HSE-BF-007    CONFINED SPACE ENTRY LOG