CONFINED SPACE ENTRY

WRITTEN PLAN

Intermediate School District 917

July 2023

General District Policy

The purpose of this program is to inform interested persons, including employees, that I.S.D. 917 is complying with the OSHA Confined Space Standard, Title 29 Code of Federal Regulations 1910.146. 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 I.S.D. 917 where employees must enter a confined space as part of their job duties.

Superintendent Michael Favor has overall responsibility for coordinating safety and health programs in this district and is the person having overall responsibility for the Confined Space Entry Program. This program will be reviewed and updated as necessary.

Copies of the written program may be obtained from Linda Berg, Health and Safety Coordinator, District Office, at 651-423-8214.

Under this program, we identify non-permit and permit- required spaces in I.S.D. 917, and provide training for our employees according to their responsibilities in these 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 that safe work practices are utilized during all activities regarding the confined spaces to prevent personal injuries and illnesses that could occur.

If, after reading this program, you find that improvements can be made, please contact Linda Berg at 651-423-8214. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective 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 district.

Hazard Evaluation for Permit Spaces

To determine if there are permit-required confined spaces in ISD 917 a review of the spaces was conducted. Information was provided by District 917 employees regarding the location of and hazards of the confined spaces. This evaluation has provided ISD 917 employees with the information necessary for the classification of the confined spaces throughout the district. This written hazard evaluation is kept in the Health and Safety files located in the district office. The confined spaces in our district have been classified.

<u>Class 1 Spaces</u> – No permit required. No known toxic gas, no engulfment potential and are naturally ventilated upon opening dampers, doors, etc.

Class 1 spaces include: (Alliance Education Center, Cedar, Lebanon, Concord Education Center)

HVAC Duct Work Plumbing Access Areas Air Conditioning Units

Pre-Entry procedures for Class 1 spaces:

- 1) Assure that a sign, which indicates that this space is a confined space, is posted at all the entrances to the space.
- 2) Only persons who have been trained on confined spaces can enter.
- 3) These spaces will be opened to allow for natural ventilation before and during the entry.
- 4) Lockout/tagout shall be applied before entry occurs.
- 5) Air monitoring is not required.
- 6) No written permit is required however the use of the attached checklist is recommended.
- 7) Notify another employee regarding entry, however no attendant is required.

Entry procedures for Class 1 spaces:

1) Ensure space is ventilated during the entry.

<u>**Class 2 Spaces**</u> – No permit required. No known toxic gas, no engulfment potential and the primary concern is adequate ventilation. These spaces have defined walls and can be effectively ventilated with a mechanically powered ventilator.

Class 2 Spaces include: (Alliance Education Center)

(Boiler Room Sumps)

Pre-Entry procedures for Class 2 spaces:

- 1) Assure that a sign, which indicates that this space is a confined space, is posted at all the entrances to the space.
- 2) Only persons who have been trained on confined spaces can enter.
- 3) Before beginning work isolate the space using barricades, cones, ribbon, etc. to prevent unauthorized persons from entering the area around the space or the space.
- 4) These spaces will be ventilated with a powered blower initially for the time period necessary to replace the volume of the confined space a minimum of five times prior to entry.
- 5) Lockout/tagout shall be applied before entry occurs.
- 6) Air monitoring is not required.
- 7) No permit is required however the use of the attached checklist is recommended.
- 8) Notify another employee regarding the entry, however no attendant is required.

Entry Procedures for Class 2 spaces:

1) Continue this ventilation at a minimum rate of 200 cfm per worker inside the space.

<u>**Class 3 Spaces**</u>-No permit required. These confined spaces are the pipe chase tunnels. These spaces are all below grade and are naturally ventilated. Some have dirt or rock floors, some have concrete floors, they open to the boiler room, have pipes running throughout, and have access hatches or openings in various locations. On occasion a tunnel has steam leaking into the tunnels necessitating repairs. These confined spaces have the potential for oxygen deficiency. They can not be manually ventilated due to their size and shape.

Class 3 Spaces include: (none)

Class 4 spaces include:

(Any confined space with sewage or the odor of sewage--dock storm drains)

There are no Class 4 spaces at Alliance Education Center, Cedar, Lebanon, or Concord Education Center.

Work Tasks Performed in a Confined Space

The work activities authorized employees are expected to perform in district confined spaces include:

- 1) Cleaning
- 2) Maintenance
- 3) Surveillance

District employees may not weld or use hazardous materials in a confined space.

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 confined spaces in ISD 917. To inform employees of the existence of a permit space, we post every entrance to a confined space. This signage indicates that unauthorized employees are not to enter. Employees who work in areas where confined spaces are accessible are trained on the existence of confined spaces.

Pre-Entry Non-Permit Confined Space Evaluation

To ensure the safety and health of our employees a Pre-Entry Checklist is available for use with Class 1, 2 and 3 spaces before entry. Use of this checklist is optional.

Equipment

To ensure the safety and health of our employees, ISD 917 will provide a torpedo mechanical fan for entry into Class 2 spaces. 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: Authorized Entrants

Only persons who have completed confined space entry training are authorized to enter our spaces. The elements covered in the training program for authorized entrants include:

- 1) Recognition of confined spaces
- 2) Understanding that only trained employees may enter
- 3) Proper procedures for entry into Class 1 and spaces
- 4) Use of equipment
- 5) Knowledge of Pre-Entry Checklist

These are the employees who have current authorization to work in our Class 1 confined spaces:

1) Lead Custodian

These are the employees who have current authorization to work in our Class 2 confined spaces:

1) Lead Custodian

Duties: Attendants

Those persons who have completed the training and have been designated as confined space attendants are assigned specific duties and responsibilities, which they must perform in confined space, job duties.

Lead Custodian duties and responsibilities include:

- 1) Maintain voice communications with employee in the confined space
- 2) Be able to access an emergency response team

Duties: Entry Supervisors

Only Scott Zehnder, who has completed the training, is designated as confined space entry custodian and is assigned specific duties and responsibilities which must be performed in confined space job duties. Those duties and responsibilities include:

- 1) Posting the entrances of all confined spaces
- 2) Ensuring that Pre-entry and Entry procedures are followed by ISD 917 Employees
- 3) Providing a copy of the Confined Space Entry Program to vendors prior to their entering any confined space.

Training Program

Every employee at ISD 917 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. This can be done using the SafeSchools Online Training. All training related materials and documents are kept in the Alliance Education Center office and in the Health and Safety files located in the District office.

When we conduct the training, we use a variety of materials and methods. New employees are always trained before their initial assignment of duties. When changes occur in permit-required confined space areas of our district, we notify custodians in the building. If we have reason to believe that an employee has deviated from a previously trained upon procedure or that their knowledge seems inadequate, discipline procedures for insubordination as outlined in the contract may be used.

Rescue and Emergency Services

ISD 917 utilizes local public emergency personnel to perform rescue and emergency services in the event of a permit space incident. To familiarize this service with our facility and emergency needs, we provide access to all permit spaces from which rescue may be necessary so the rescue team can develop appropriate rescue plans and practice rescue operations. We also send a copy of this plan to the Rosemount fire department.

Multiple Employer Entry Procedures

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

- 1) The Lead Custodian provides contractors with a copy of the Confined Space Entry Written Program.
- 2) The Lead Custodian informs the contractor that they are to follow appropriate safety procedures.
- 3) The Lead Custodian informs outside personnel of any expected hazards.
- 4) The Lead Custodian retains a copy of any Pre-Entry Checklists or Permits completed by the contractor.
- 5) The Lead Custodian will debrief the people entering to ascertain if there was any change in conditions confronted in the space and report these changes to the Health and Safety Coordinator.

Post-operations Procedures

Upon completion of work in a confined space, we follow these procedures to close-off the space.

- 1) Barricades are removed.
- 2) Any hatches or doors are closed.
- 3) The Pre-Entry checklist is filed.

Review-Procedures

To ensure that all employees participating in entry operations are protected from confined space hazards; ISD 917 reviews the Confined Space Entry Program on a regular basis. ISD 917 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 confined space entry hazards, and compliance with all safety rules is considered conditions of employment. Supervisors reserve the right to issue disciplinary warnings to employees and to act as detailed in the contract.

Appendix

Appendix A: Optional Pre-Entry Checklist for Use with Class 1 and 2.