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Confined Space Entry

This procedure ensures the safety of employees, inmates, and others who are required to enter and conduct work in confined spaces within Oklahoma Department of Corrections (ODOC) facilities and other work locations. The Environmental Health and Safety Unit assists with the identification of confined spaces at facilities and/or work locations. (2-CO-2A-01)

I. Definitions

A. Acceptable Entry Conditions

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

B. Attendant

An individual stationed outside a permit space who monitors the authorized entrants and who performs all the attendants' associated duties assigned in the permit space program.

C. Authorized Entrant

A person who is trained and authorized by the employer to enter a permit

space.

D. Confined Space

A confined space has all of the following characteristics:

1. It is large enough and so configured that a person can bodily enter and perform assigned work;
2. It has limited or restricted means of entry or exit;
3. It is not designated for continuous occupancy; and
4. It has limited air movement.

Examples of confined spaces include, but are not limited to: boilers, crawl spaces, degreasers, furnaces, manholes, pipelines, pits, pumping stations, reaction or process vessels, septic tanks, sewage digesters, sewers, silos, storage tanks, utility vaults, or vats.

E. Emergency

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

F. Engulfment

The surrounding and effective capture of a person by a liquid or finely divided solid substance that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

G. Entry

The action by which any part of the entrant's body breaks the plane of an opening into the space.

H. Entry Permit

The written or printed document that is provided by the employer to allow and control entry into a permit space.

I. Entry Supervisor

The person who determines 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 if necessary.

J. Hazardous Atmosphere

An atmosphere that may expose persons to the risk of death, incapacitation, impairment of ability to self-rescue, injury, or acute illness.

K. Hot Work Permit

The written authorization to perform certain operations (e.g., riveting, welding, cutting, burning, or heating) capable of providing a source of ignition.

L. Immediately Dangerous to Life and Health (IDLH)

Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that interferes with an individual's ability to escape unaided from a permit space.

M. Non-permit Space (Alternate Space)

A confined space that does not contain or have the potential to contain any hazards capable of causing death or physical harm.

N. Oxygen Deficient Atmosphere

An atmosphere containing less than 19.5 percent oxygen by volume.

O. Oxygen Enriched Atmosphere

An atmosphere containing more than 23.5 percent oxygen by volume.

P. Permit Required Confined Space

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

1. Contains or has the potential to contain, a hazardous atmosphere;
2. Contains a material that has the potential to engulf an entrant;
3. Has an internal configuration in which an entrant could be trapped or asphyxiated; and
4. Contains any other recognized serious safety or health hazard.

Q. Permit-required Confined Space Program

The overall program for controlling and protecting employees and inmates from permit space hazards and for regulating employee and inmate entry into

permit spaces.

R. Retrieval System

The equipment used for non-entry rescue of persons from permit spaces.

S. Testing

The process by which the hazards that may confront entrants of a permit space are identified and evaluated. This process includes specifying the tests that are to be performed in the permit space.

II. Classifying Confined Spaces

A. Facility Diagram

Each facility will identify all permit-required confined spaces on a facility diagram, which is to include physical descriptions of location. A copy of the confined space diagram will be provided to the Environmental Health and Safety Unit. Environmental Health and Safety staff will view confined spaces during scheduled inspections to ensure that they are posted correctly.

III. Reclassifying Confined Spaces

As general conditions, the use of or the configuration of a confined space change over time, reevaluation and reclassification of the space by the facility/unit head will be required. Any reclassification of permit required confined space by the facility/unit head will be in consultation with a qualified person having proper training and experience in a confined space entry program. The reclassification is to be updated on the confined space diagram and occur in accordance with the following criteria:

A. Hazard Elimination

The permit space poses no natural or potential atmospheric hazard and all hazards within the space have been eliminated without entry into the space. If initial entry by personnel is necessary to determine the atmospheric conditions, the entry will be performed as a permit-required confined space entry.

B. Testing

The hazards within the confined space have been eliminated and verified by proper testing (continuous monitoring is still required).

C. Documentation

Documentation certifying elimination of the hazard within the space must include:

1. Date of certification;
2. Location and description of the space;
3. Name and signature of a qualified person making the determination;
and
4. Periodically recorded monitoring readings (trending).

D. Reclassification of Declassified Permit Required Confined Space

Reevaluation and reclassification of a declassified permit space by the Environmental Health and Safety Unit will occur when new hazards arise and before persons are allowed to reenter the space. Examples of new hazards may include flash floods, fatigue, injury to a team member, weak battery in monitoring equipment, or a telephone company putting nitrogen into their lines.

IV. Warning Unauthorized Personnel

A. Placards

All employees, inmates, and others will be warned about permit spaces by display of a placard which reads, "Danger-Permit Required Confined Space. Do Not Enter."

B. Informational Measures

The facility/unit head will ensure that employees and others who may be exposed to permit required confined spaces will be informed of the existence, location, and danger of these spaces.

V. Permit Space Hazards

A. Classification

Atmospheric hazards are classified into the following three categories:

1. Asphyxiating Atmospheres

Asphyxiating atmospheres are those in which there is insufficient oxygen to sustain human respiratory needs (contains less than 19.5 percent oxygen). Materials in the space can absorb oxygen, or it can be consumed by a chemical reaction (rusting), or the space may be intentionally filled with gases such as helium, nitrogen, argon, or carbon dioxide.

2. Flammable or Explosive Atmospheres

A flammable or explosive atmosphere exists in a confined space when a flammable gas or vapor is present at a concentration of greater than 10 percent of its lower flammable limit (LFL), or if a combustible dust is present at a concentration of greater than or equal to its LFL. Examples of such concentrations include methane, acetylene, vapors from solvents or fuels such as carbon disulfide, gasoline, kerosene, or toluene, and combustible dust such as coal or grain dust.

3. Toxic Atmospheres

A toxic atmosphere contains poisonous gases, vapors, or fumes. This would include carbon monoxide and hydrogen sulfide.

B. Testing for Atmospheric Hazards

The confined space entry supervisor will ensure that pre-entry testing for atmospheric hazards is used to determine the presence of the following three basic hazards:

1. Oxygen Level

The oxygen level in the workspace must be at least 19.5 percent, but not more than 23.5 percent. The oxygen level test will be performed before testing for flammables or toxic vapors.

2. Flammable or Explosives Gases

Testing for the presence of flammable or explosive gases will be performed after testing for oxygen level in various levels of the space.

3. Toxic Gases or Vapors

Testing for the presence of toxic gases or vapors will follow testing for flammable or explosive gases.

C. Monitoring

In addition to pre-entry testing, continuous monitoring will be used to ensure conditions encountered at the point of entry in large continuous systems accurately indicate conditions at a distance from the entry.

D. Physical Hazards

The two primary physical hazards are:

1. Mechanical Hazards

Mechanical hazards (e.g., hydraulic, electric, pneumatic hazards) in confined spaces will be avoided by following OSHA's standard on the control of hazardous energy sources (Lockout/Tag-out), CFR 1910.147 and in accordance with [OP-150330](#) entitled "Program for the Control of Hazardous Energy/Lockout and Tagout."

2. Engulfment

Engulfment in confined spaces will be avoided by following control measures described in OSHA's Excavations, Trenching, and Shoring, CFR 1926.650-652 Subpart P and other relevant regulations.

- E. Personal Protective Equipment (PPE)

Personal protective equipment (PPE) is to be used only as an option of last resort. Preferably, the space will be cleared of hazardous conditions prior to entry. Personal protective equipment is used only when all other control measures have proven to be inadequate.

The facility/unit head will ensure that no person will be required to enter a confined space without being provided the proper PPE and certified training.

- VI. Entry Procedures

- A. Program Requirements

Each facility/unit head will ensure that the following requirements are followed:

1. Entry Control

The measures to be used to prevent unauthorized entry into permit spaces.

2. Hazard Identification

The identification and evaluation of hazards associated with each permit space.

3. Hazard Control

The development and implementation of the means, procedures, and practices necessary for safe permit space entry operations to include:

- a. Specification of acceptable entry conditions;

- b. Isolation of the permit space;
- c. Elimination or control of atmospheric hazards;
- d. Provisions for pedestrian, vehicle, or other barriers or guards as necessary to protect entrants from entrance hazards; and
- e. Verification that conditions of the permit space is acceptable for entry throughout the duration of authorized entry. This will include continuous monitoring and hazard control (e.g., lockout, tag-out, etc.) to ensure a zero energy state.

4. Equipment

The identification of the type, maintenance, and proper use of the following equipment will be provided and will include the following:

- a. Testing and monitoring equipment;
- b. Ventilating equipment;
- c. Personal protective equipment specific to the hazards that will be encountered (where engineering controls and work practices do not adequately protect employees);
- d. Lighting equipment (adequate for the conditions assuring there is no ignition source);
- e. Communication equipment, which depending upon the circumstances, may include continuous radio contact, voice, rope signals, hand signals, runners, or TV cameras;
- f. Protective barriers and shields;
- g. Ladders (suitable for entry and egress);
- h. Rescue and emergency equipment; and
- i. Other equipment or measures necessary for safe entry into and rescue from permit spaces (e.g., disposable cover-alls, asbestos suits, heating, chilling, liquid electrolytes, and frequent breaks).

5. Conditions and Testing

The specifications regarding permit space conditions will be evaluated when entry operations are to be conducted. The following tests will be conducted each time a permit space is to be entered:

- a. Pre-entry testing; and
- b. Continuous monitoring.

6. Attendants

Provisions will be made for ensuring at least one attendant remains on duty outside a permit space for the duration of entry operations.

7. Multiple Spaces

An explanation of the means and procedures to enable attendants to monitor more than one permit space and to respond to an emergency in one space without distraction from his or her duties as an attendant for other nearby spaces occupied at the same time.

8. Responsibilities and Training

The written designation of persons is required who are to have active roles in entry operations, including the identification of the duties of each employee, and procedures for training employees in those responsibilities.

9. Emergencies

Written procedures will include an emergency plan for summoning rescue and emergency personnel or services to rescue entrants from permit spaces. Additionally, the procedures will outline the process for providing necessary emergency services to rescued employees and for preventing unauthorized personnel from attempting rescue.

10. Permits

A system will be established by the Environmental Health and Safety Unit for the preparation, issuance, use, and cancelation of entry permits.

11. Outside Contractors

Procedures regarding the coordination of entry operations to protect outside contractors will be included.

12. Conclude Entry

Provisions for closing off the permit space, canceling the permit, and the steps necessary for concluding the entry after work has been completed will be included. Upon conclusion, an accurate head count

will also be conducted.

13. Review of Entry Operations

Measures for the review and revision of facility permit space program will be made when there is reason to believe existing measures are inadequate to protect those persons involved. The review will include adequacy of equipment, compliance with safety rules, near misses, and accidents.

14. Annual Review

The procedures will provide for an annual review of the permit space program.

B. Alternate Entry Procedures

OSHA's final standard permits an exception to the written program requirement outlined in Section V. item A. of this procedure

1. An exception to the written plan will be allowed if:
 - a. It can be demonstrated that the only hazard posed by the space is an actual or potential hazardous atmosphere;
 - b. It can be proven that continuous forced air ventilation alone is sufficient to make and keep the space safe for entry;
 - c. Monitoring and inspection data support the assessment that the only hazard is atmospheric and that it can be controlled by ventilation alone;
 - d. Compliance with permit requirements or initial entry at the space to obtain monitoring and inspection data; and
 - e. Monitoring and inspection data is made available to any person who must enter the space.
2. Operating under the above exception(s) (Section VI. item B. of this procedure) requires:
 - a. Elimination of conditions making it unsafe to remove an entrance cover before it is removed;
 - b. Guarding openings by railing, temporary covers, or other temporary barriers;
 - c. Atmospheric testing before a person enters the space with a

calibrated direct reading instrument, testing for oxygen content, flammable gases and vapors, and potential toxic air contaminants;

- d. Elimination of hazardous atmosphere within the space when an entrant is inside;
- e. Use of continuous forced air ventilation as follows:
 - (1) Entry is allowed only after forced air ventilation has eliminated any hazardous atmosphere;
 - (2) The forced air ventilation must ventilate the immediate areas where entrants are (or will be) working and must continue until all entrants have left the space; and
 - (3) The air supply must come from a clean source and cannot in any way increase the hazards of the space.
- f. The continuous testing of the atmosphere;
- g. The detection of hazardous atmosphere during entry will result in:
 - (1) Immediate evacuation of entrants from the spaces;
 - (2) Evaluation of the space to find out how the hazardous atmosphere developed; and
 - (3) Implementation of measures to protect persons before allowing reentry into the permit space.
- h. Verification that the space is safe to enter will be certified in writing to include:
 - (1) Name of the person certifying that the space is safe;
 - (2) Date; and
 - (3) Location of the space.

VII. Permits and Permit Systems

A. Permits

Each facility/unit having permit spaces will establish a procedure outlining the process for initiating requests for entering permit spaces in accordance with [Attachment B](#) entitled "Confined Space Entry Permit" (attached).

B. Permit Systems

The entry supervisor will be responsible for a permit system of the following requirements ([Attachment C](#) entitled "Appendices to § 1910.146 Permit-Required Confined Spaces," attached):

1. Before entry begins, the person designated as the entry supervisor must sign and issue the permit to authorize entry;
2. The permit must be posted at the entry; and
3. The duration of the permit cannot exceed the time required to complete the job within one shift.
4. The entry supervisor will terminate entry and cancel the permit when:
 - a. Entry operations covered by the permit have been completed; or
 - b. A condition that is not allowed under the entry permit arises in or near the permit space.
5. Canceled entry permits will be kept on file for at least one year to allow for review of the facility permit space program.

VIII. Training and Responsibilities

The OSHA standard requires training for all persons who are involved in entry procedures. The facility/unit head will ensure that these persons will have demonstrated the understanding, knowledge, and skills necessary for safely performing their assigned duties concerning confined spaces.

A. Training

The facility/unit head, as outlined in this procedure, will ensure that training is designed according to OSHA requirements to ensure that all persons involved in permit space entry are proficient in their duties. Training will also be provided by the facility's safety consultant, to introduce all employees with new or revised procedures pertaining to hazards presented by confined spaces. Additional training will be provided:

1. Before a person is first assigned duties connected with confined spaces;
2. Before there is a change in duties;
3. Whenever a change in permit space operation presents a hazard that the person has not been warned about; and

4. Whenever there is reason to believe there are inadequacies in a person's knowledge or use of procedures.

B. Responsibilities

The facility/unit head will ensure the following five categories of persons who have responsibilities regarding confined space entry are provided training as outlined in Section VIII. item A. of this procedure.

1. Authorized Entrants

All authorized entrants must:

- a. Know the hazards they may face during entry, including the signs, symptoms, and consequences of exposure to these hazards;
- b. Use required equipment properly as approved by the facility's safety consultant;
- c. Communicate with the attendant so that the attendant can monitor the entrant's status and alert the entrant in an emergency;
- d. Alert the attendant whenever the entrant recognizes any warning sign or symptom of exposure to a dangerous situation or detects a prohibited condition; and
- e. Exit the permit space as quickly as possible when ordered to do so by the attendant or entry supervisor or whenever faced with a dangerous situation.

2. Attendants

a. OSHA Requirements

OSHA regulations require that an attendant be posted outside each permit space during entry operations.

b. Duties

Attendants monitor the activities of the authorized entrants. They perform no other duties that would interfere with their duties as a permit space attendant. Specific duties include:

- (1) Knowing the hazards they may be faced with during entry, including the signs, symptoms, and consequences of exposure to these hazards;

- (2) Being aware of possible behavioral effects of hazard exposure;
- (3) Maintaining an accurate count of authorized entrants in the permit space, and ensuring that the means used to identify the entrants (i.e., lists, tracking systems, etc.) accurately identify who is in the permit space;
- (4) Remaining outside the permit space during entry operations until relieved by another attendant;
- (5) Communicating with entrants to monitor their status and alert them about the need to evacuate in an emergency;
- (6) Monitoring activities inside and outside the space to determine whether it is safe for entrants to remain inside;
- (7) Warning unauthorized persons to stay away from permit spaces or order them out if they have already entered;
- (8) Reporting unauthorized entries to the entry supervisor and to the authorized entrants inside the space; and
- (9) Performing non-entry rescue.

3. Entry Supervisors

The entry supervisor is in charge of the entry operation and the safety of all participants. The supervisor must:

- a. Know the hazards participants may face during entry including signs, symptoms, and consequences of exposure;
- b. Check the permit to verify that all tests specified have been conducted;
- c. Make sure all procedures and equipment is in place before signing the permit allowing entry;
- d. Verify that rescue services are available and the means for summoning them are operating properly;
- e. Remove unauthorized individuals who enter or attempt to enter a permit space during entry operations;
- f. Terminate the entry and cancel the permit when the operation

is completed; and

- g. Maintain acceptable entry conditions, consistent with requirements of the permit, when responsibility for a space is transferred to another supervisor (for example, during a shift change).

4. Contractors

The facility/unit head may choose to use the services of outside contractors to perform work in or around confined spaces. In such instances, assigned facility/unit staff and contractors will observe the following guidelines.

a. The facility/unit will:

- (1) Inform the contractor that the workplace contains permit spaces and that entry to those spaces is allowed only through compliance with the established permit program;
- (2) Explain to the contractor why the space(s) is/are classified as permit space(s) (describe the hazards, etc.);
- (3) Warn the contractor about the precautions and procedures used to protect persons who work in or near the permit spaces where the contractor's employees will be working. Verify that contract employees have received confined space entry training and maintain a copy of their confined space entry training for our files.;
- (4) Coordinate entry operations with the contractor, when both the contractor's employees and the facility/unit's employees or inmates will be working together in or near permit spaces; and
- (5) Question the contractor at the end of any entry operation about the permit program and any hazards encountered or created during entry operations.

b. The contractor will:

- (1) Obtain available information regarding hazards and entry operations from the facility/unit;
- (2) Coordinate entry operations with the facility/unit when facility/unit's personnel and the contractor's employees

are working together in or near a permit space; and

- (3) Inform the facility/unit of any hazards encountered or created during the entry.

IX. Rescue Procedures

Rescue procedures can be either performed by in-house or designated outside emergency personnel (i.e., local fire department) subject to the following regulations:

A. In-House Rescue Teams

When facility personnel are designated to perform permit space rescue services, the facility/unit head will ensure the following conditions are met:

1. Ensure that each member of the rescue service team is provided with the necessary personal protective equipment and rescue equipment and is fully trained in its use.
2. Ensure rescue service team members are trained (a minimum of 40 hours initial training); to include the same training provided to authorized entrants.
3. Simulated rescue operations are held in actual permit spaces at least once a year to allow rescue service team members to practice rescue procedures. The simulation must include the removal of either real people or manikins from these spaces.
4. Ensure that each member of the rescue service team is trained in basic first aid and CPR/AED.
5. Ensure the following steps to establish, equip, and train rescue service team members are followed:
 - a. Establish the mission for the rescue services team;
 - b. Determine the size of the team (usually five to six staff) to ensure adequate coverage taking into consideration sick leave, annual leave, mandatory post assignments, other training requirements, response time, etc.;
 - c. Establish criteria for selecting team members to include, physical conditioning, shift assignments, volunteers, and ability to attend training and simulations;
 - d. Select an experienced trainer to meet the team's training goals and to conduct both written and performance based testing

with the team;

- e. Solicit help from the trainer in choosing the equipment needed by the rescue service team; purchase only equipment designed for use with human payloads;
- f. Establish and train team members on procedures, which define team structure, team leadership, and rescue service response criteria;
- g. Educate employees about the rescue team's capabilities; and
- h. Provide two to three days each quarter to allow for follow-up drills and practice in each type of confined space.

B. Outside Rescue Services

Should facilities choose to contract with an outside service to handle permit space emergencies, the facility/unit head will:

1. Inform members of the rescue service of the hazards they may encounter; and
2. Provide the rescue service access to the facility's permit space to allow them to develop rescue plans and practice rescue operations.

C. Non-entry Rescue

The safest form of rescue is from outside the permit space. OSHA, therefore, strongly recommends that entrants wear retrieval equipment, unless to do so would increase overall risk or would not contribute to rescue in an emergency. The facility/unit head is required under OSHA standards to facilitate non-entry rescue by:

1. Requiring each authorized entrant to wear a full body harness, with a retrieval line attached to the center of the back near shoulder level or above the head. Wristlets may be approved if the use of a harness would be ineffective or dangerous; and
2. Ensuring that the end of the retrieval line is attached to a mechanical device or fixed point outside the permit space. For vertical spaces more than five feet deep, a mechanical device must be used.

D. Rescue Strategies, Techniques, and Rigging

The following basic steps will be followed to mobilize a rescue team in the event of an emergency:

1. Locate rescue team members, entry supervisor, and attendant;
2. Recognize and mitigate hazards, for example, de-energize, lock out and tag out energy sources to the space; provide ventilation, etc.;
3. Determine how the victim got into the current position (i.e., slumped over–no trauma or fall 28 feet–trauma);
4. Use of Safety Data Sheets (SDS);
5. Develop a rescue strategy;
6. Devise a system for rapid retrieval of rescuers;
7. Use full body harnesses with four connection points - chest front and upper back and wrists front and back;
8. Establish two methods of communication;
9. Replace the regular attendant during the rescue; and
10. Review basic training.

E. Key Principles of Rescue

General rescue principles include:

1. Always having rescuers outside, ready, and equipped;
2. Emphasizing that the rescuer's chief concern should be his or her own safety;
3. Always using, at a minimum, a two-person rescue team;
4. Recommending the use of fresh air breathing systems over self-contained breathing apparatus due to their use of fresh air and unlimited supply of air; and
5. Being aware of fatigue.

X. Action Plan for Confined Space Entry

To establish an action plan for confined space entry, each facility/unit head will:

A. Identify and Evaluate Confined Spaces

Identify and evaluate confined spaces to determine whether they are permit or non-permit spaces. Reclassification of confined spaces should occur as conditions, use, or configuration changes over time.

B. Identify Hazards

Determine whether atmospheric, mechanical, engulfment, internal configuration, or other serious hazards are present.

C. Warn Affected Persons

Inform employees, inmates, contractors, and visitors who may be exposed to the hazards of permit spaces of the existence, location, and danger of those spaces. OSHA requires the posting of placards outside all permit spaces. These persons should also be familiar with the established written plan and safety procedures they will be expected to follow.

D. Create a Written Plan

Create a written plan that includes all the 14 elements required by OSHA's regulations.

E. Set up a Permit System

Set up a permit system that will establish a method by which permits will be issued, posted, and canceled.

F. Devise Entry Permits

Use of the permit included as outlined in [Attachment B](#) of this procedure.

G. Prepare an Emergency Rescue Plan

Contract with an outside rescue service or equip and train facility employees to provide rescue services in-house when confined spaces are identified.

H. Equipment/Training

Provide testing and monitoring, rescue, lockout, tag-out, communications equipment, and training.

I. Evaluate the Program

The facility/unit head will review the established permit program at least once a year, paying particular attention to incidents or near misses. Canceled permits to permit spaces will also be reviewed to determine frequency and circumstances of activity during the period under evaluation. The permit program will be revised on an as needed basis and through the annual evaluation.

J. Environmental Health and Safety Annual Review

The Environmental Health and Safety Unit will review each facility's confined space program on an annual basis.

XI. References

OP-150330 entitled "Program for the Control of Hazardous Energy/Lockout and Tagout"

Confined Spaces: What You Need to Know About the Final Standard (1993), Bureau of Business Practices.

The OSHA 500 (Revised 1993) Moran Associates, Inc.

Title 29, Code of Federal Regulations 1910.146–Permit–Required Confined Spaces

Title 29, Code of Federal Regulations 1910.147 Control of Hazardous Energy Sources (Lockout/Tagout)

Title 29, Code of Federal Regulations 1926.650 -.652 Subpart P Excavations, Trenching, and Shoring

XII. Action

The director of Environmental Health and Safety and the regional directors/affected directors are responsible for compliance with this procedure.

The director of Auditing and Compliance is responsible for the annual review and revisions.

Any exceptions to this procedure will require prior written approval from the agency director.

This procedure is effective as indicated.

Replaced: Operations Memorandum No. OP-150320 entitled "Confined Space Entry" dated May 21, 2018

Distribution: Policy and Operations Manual
Agency Website

<u>Attachments</u>	<u>Title</u>	<u>Location</u>
Attachment B	“Confined Space Entry Permit”	Attached
Attachment C	“Appendices to § 1910.146 Permit–Required Confined Spaces”	Attached

