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Brunel Energy, Inc.

Confined Space - Permit Confined Space

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1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA to ensure the safety of all employees and contractors working for The Company and to comply with all regulations and host clients that pertain to confined spaces.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Acceptable entry conditions** are the conditions that must exist in a confined space to allow entry and to ensure that employees involved with a confined space entry can safely enter into and work within the space.
- 3.2. **Attendant** is an individual stationed outside one or more Confined spaces who monitors the authorized Entrants and who performs all Attendant's duties assigned in the Company Confined Spaces Program. Attendants must have sufficiently completed and fully understand the Confined Space training and is approved by the HSE Manager to work in a confined space as an Attendant.
- 3.3. **Authorized Entrant** is an individual who is authorized by the Company to enter a confined space. Entrants must have sufficiently completed and fully understand the Confined Space training and is approved by Management to work in a confined space as an Authorized Entrant.
- 3.4. **Blanking or Blinding** is 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.
- 3.5. **Confined Space** is a space that is large enough and so configured that an employee can bodily enter and perform assigned work;

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- 3.5.1. Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- 3.5.2. Is not designed for continuous occupancy.
- 3.6. **Double block and bleed** is 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.
- 3.7. **Emergency** is any occurrence (including any failure of hazard control or monitoring equipment) or an event internal or external to the confined space that could endanger Entrants.
- 3.8. **Engulfment** is 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.
- 3.9. **Entry** is the action by which a person passes through an opening into a 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.
- 3.10. **Entry permit** is the written or printed document that is provided by the Company to allow and control entry into a confined space that contains the information specified in this program.
- 3.11. **Entry Supervisor** is the person responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.
- 3.12. **Hazardous atmosphere** is 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 confined space), injury, or acute illness from one or more of the following causes:
 - 3.12.1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL), (0% is normal).
 - 3.12.2. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
 - 3.12.3. Any other atmospheric condition that is immediately dangerous to life or health. (Ex.-H2S 10%, 0% is normal).
 - 3.12.4. 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, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

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- 3.13. **Hot work permit** is the written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.
- 3.14. **Immediately dangerous to life or health (IDLH)** is 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 confined space.
- 3.14.1. Note: Some materials such as 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".
- 3.15. **Inerting** is the displacement of the atmosphere in a permit space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible. This procedure produces an IDLH oxygen deficient atmosphere.
- 3.16. **Isolation** is the process by which a confined 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 system; lockout or tagout of all sources of energy; or blocking or disconnecting all mechanical linkages.
- 3.17. **Line Breaking** is 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.
- 3.18. **Non-Permit Confined Space** is 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.
- 3.19. **Oxygen deficient atmosphere** is an atmosphere containing less than 19.5 percent oxygen by volume.
- 3.20. **Oxygen enriched atmosphere** is an atmosphere containing more than 23.5 percent oxygen by volume.
- 3.21. **Permit-Required Confined Space** is a confined space that has one or more of the following characteristics:
- 3.21.1. Contains or has the potential to contain a hazardous atmosphere.
- 3.21.2. Contains material that has the potential for engulfing an Entrant.
- 3.21.3. 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.
- 3.21.4. Contains any other recognized serious safety or health hazard.

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- 3.22. **Permit system** is the employer's written procedure for preparing and issuing permits for entry and for returning the confined space to service following termination of entry.
- 3.23. **Prohibited condition** is any condition in a confined space that is not allowed by the permit during the period when entry is authorized.
- 3.24. **Rescue service** is the personnel designated to rescue employees from Permit-Required Confined Spaces.
- 3.25. **Retrieval system** is 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 confined spaces.
- 3.26. **Testing** is the process by which the hazards that may confront Entrants of a confined space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

4. Responsibilities

- 4.1. Manager(s):
 - 4.1.1. Shall ensure that all employees have been trained and fully understand the requirements of this program.
 - 4.1.2. Shall provide the necessary equipment to comply with these requirements and ensure that all employees are trained in its use.
 - 4.1.3. Shall ensure that all confined space assessments have been conducted and documented.
 - 4.1.4. Shall ensure that provisions and procedures are in place for the protection of employees from external hazards including but not limited to pedestrians, vehicles, and other barriers and by use of the pre-entry checklist verifying that conditions in the permit space are acceptable for entry during its duration.
 - 4.1.5. Shall ensure that all Permit-Required Confined Spaces permits are posted.
 - 4.1.6. Shall ensure an annual review of the program including all entry permits issued that during that annual period.
 - 4.1.7. Shall ensure that confined spaces are identified properly as either a Non-Permit Confined Space or a Permit-Required Confined Space.
 - 4.1.8. Shall ensure that all confined spaces that have been identified as “no entry” have signs that state, “DANGER- DO NOT ENTER”.
 - 4.1.9. Shall ensure signs have been posted at all Permit-Required Confined Space areas that state, “DANGER – PERMIT ENTRY CONFINED SPACE” along with the proper warning word such as “ASPHYXIAN, FLAMMABILITY or TOXIC HAZARD”
 - 4.1.10. Shall file all permits at the area offices for review. Permits shall be kept on file for one year.

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4.2. Entry Supervisor(s):

- 4.2.1. Entry Supervisors must have sufficiently completed and fully understand the Confined Space training and is approved by the HSE Manager to work in a confined space.
- 4.2.2. An Entry Supervisor may also 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.
- 4.2.3. The Entry Supervisor is responsible for testing and monitoring the atmosphere conditions.

4.3. Authorized Entry Supervisor Duties:

- 4.3.1. Shall have a tailgate safety meeting, with all workers to be involved in the confined space entry and review the job to be performed and what safety concerns may be present.
- 4.3.2. Shall confirm that all isolation, Lock/out and Tag/outs have been completed prior to entry into a confined space.
- 4.3.3. Shall ensure that the requirements of this program are followed and maintained.
- 4.3.4. Shall test all atmosphere conditions prior to entry and shall complete and maintain the confined space permit form and have it accessible for review on the job site at all times.
- 4.3.5. Shall notify The Company supervisor of entry into a confined space and notify the supervisor of any changes that may occur, during an entry.
- 4.3.6. If the confined space poses a hazard that cannot be eliminated, the Entry Supervisor must arrange for a rescue service.
- 4.3.7. If the confined space poses no hazards to the Entrants, the Entry Supervisor can reclassify the confined space to a Non-Permit Confined Space.
- 4.3.8. A stand-by rescue team is not required to be on site for Non-Permit Confined Space

4.4. Authorized Attendant Duties:

- 4.4.1. Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- 4.4.2. Is aware of possible behavioral effects of hazard exposure in authorized Entrants.
- 4.4.3. Continuously maintains communication and an accurate count of authorized Entrants in the confined space and ensures that the means used to identify authorized Entrants, and accurately identifies who is in the confined space.
- 4.4.4. Remains outside the confined space during entry operations until relieved by another Attendant.

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- 4.4.5. If more than one confined space is to be monitored by a single attendant, the program must include the means & procedures that will be used in order to enable the attendant to respond to emergencies in one or more permit spaces that he/she is monitoring without distraction from all responsibilities.
- 4.4.6. Attendants may enter a confined space to attempt a rescue, if they have been trained and equipped for rescue operations as required and only when another Authorized Attendant has relieved them.
- 4.4.7. Monitors activities inside and outside the confined space to determine if it is safe for Entrants to remain in the space and orders the authorized Entrants to evacuate the confined space immediately under any of the following conditions:
 - 4.4.7.1. If the Attendant detects a prohibited condition;
 - 4.4.7.2. If the Attendant detects the behavioral effects of hazard exposure in an Authorized Entrant;
 - 4.4.7.3. If the Attendant detects a situation outside the space that could endanger the Authorized Entrants;
 - 4.4.7.4. If the Attendant cannot effectively and safely perform all the duties required.
- 4.4.8. Summon rescue and other emergency services as soon as the Attendant determines that authorized Entrants may need assistance to escape from confined space hazards.
- 4.4.9. Takes the following actions when unauthorized persons approach or enter a confined space while entry is underway:
 - 4.4.9.1. Warn the unauthorized persons that they must stay away from the confined space;
 - 4.4.9.2. Advise the unauthorized persons to exit the confined space immediately, if they have entered the space;
 - 4.4.9.3. Inform the authorized Entrants and the Entry Supervisor if unauthorized persons have entered the confined space.
 - 4.4.9.4. Performs no duties that might interfere with the Attendant's primary duty to monitor and protect the authorized Entrants.
- 4.4.10. Authorized Attendants shall not monitor more than one confined space at a time.
- 4.5. Affected Employee(s):
 - 4.5.1. Shall attend Confined Space Entry training commensurate with their duties and when duties change as required.
 - 4.5.2. Shall comply with all aspects of this program.

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4.5.3. Authorized Entrants, Attendants and Entry Supervisors may be any Company employee that is authorized by management to work in a confined space setting and that has been trained and is proficient in the understanding of program requirements.

4.6. Authorized Entrant Duties:

4.6.1. Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;

4.6.2. Uses appropriate personal protective equipment properly, e.g., face and eye protection, and other forms of barrier protection such as gloves aprons, coveralls, and breathing equipment; Is aware of possible behavioral effects of hazard exposure in Authorized Entrants;

4.6.3. Entrants or their representatives shall be given an opportunity to participate in and review calibrated air monitoring data before entry is made.

4.6.4. Entrants or their representatives are entitled to request additional monitoring at any time.

4.6.5. Maintain communication with the Attendants to enable the Attendant to monitor the Entrants status as well as to alert the Entrant to evacuate if needed; and

4.6.6. Exit from confined spaces as soon as possible when ordered by an Attendant or Entry Supervisor, when the Entrant recognizes the warning signs or symptoms of an exposure exists, or when a prohibited condition exists, or when an alarm is activated.

5. Procedure

5.1. Non-Permit Confined Space Entry

5.1.1. If testing of the confined space atmosphere is within acceptable limits without the use of forced air ventilation and the space is properly isolated, the space can be entered by following the requirements for Level I confined space entry.

5.1.2. Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.

5.1.3. Entrants shall review and sign the confined space permit.

5.1.4. Employees may enter and work in the confined space as long as LEL, O2, and toxicity hazards remain at safe levels.

5.1.5. Complete the Company Confined Space Entry Permit to document that there are no confined space hazards. Make this certification available to all personnel entering the space.

5.1.6. A trained Attendant must always be outside the confined space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.

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- 5.1.7. Exception: The Attendant requirements for Level I confined space entry may be exempted, if the job assessment is performed and has determined that there are no inherent dangers to allow single person entry.
- 5.1.8. This provision is intended to permit field operations to enter crankcases, shallow valve boxes, cellars, excavations, etc. without an Attendant being present and all other aspects of the entry permit complied with.
- 5.1.9. When there are changes in the use and configuration of a confined space that might increase the hazards to the Entrants (e.g., using epoxy coating on a tank floor, welding, painting, etc.), re-evaluate the space. If necessary, reclassify the space as a Permit-Required Confined Space.
- 5.1.10. Continuously monitor the confined space atmosphere to ensure that it is still safe.
- 5.1.11. The space must not contain a hazardous atmosphere while personnel are inside.
- 5.1.12. If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- 5.1.13. Re-evaluate the space to determine how the hazardous atmosphere developed. The Entry Supervisor shall cancel the entry permit.
- 5.1.14. Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- 5.1.15. Reissue the Company Confined Space Entry Permit before allowing Entrants to re-enter the space.
- 5.1.16. If necessary, reclassify the space as a Permit-Required Confined Space.
- 5.1.17. Ensure that vehicle or other equipment exhaust does not enter the space.
- 5.2. Permit-Required Confined Space Entry
 - 5.2.1. If the space is properly isolated and results of air monitoring are above acceptable parameters without local exhaust ventilation in operation, classify the entry as a Permit-Required Confined Space.
 - 5.2.2. Complete the Company Confined Space Entry Permit before proceeding with work in a Permit Required Confined Space.
 - 5.2.3. Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
 - 5.2.4. Entrants shall review and sign the confined space permit.
 - 5.2.5. At least one trained Attendant must always be outside the Permit-Required Confined Space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.
 - 5.2.6. Only authorized Entrants may enter a Permit-Required Confined Space.
 - 5.2.7. All Entrants must sign in and out on the entry permit when entering and leaving a Permit-Required Confined Space.

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- 5.2.8. The back of the permit or a sign-in sheet must be used for this purpose.
- 5.2.9. Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Conditions must be continuously monitored where Entrants are working to determine that acceptable conditions are maintained during entry.
- 5.2.10. If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- 5.2.11. The Entry Supervisor shall cancel the entry permit.
- 5.2.12. Re-evaluate the space to determine how the hazardous atmosphere developed.
- 5.2.13. Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- 5.2.14. Re-issue the Confined Space Entry Permit before allowing Entrants to reenter the space.
- 5.2.15. Employees or their representatives are entitled to request additional monitoring at any time.
- 5.2.16. The permit must be terminated when the entry operations are complete or when permit conditions change (i.e., hazardous air monitoring results are noted, unsafe behaviors are observed, etc.).
- 5.2.17. The minimum rescue equipment required for Permit-Required Confined Space entry is covered in the Rescue & Emergency section of this program.
- 5.2.18. Permit-Required Confined Space entry operations will be reviewed when the Company believes that the requirements of this confined space program may not adequately protect personnel.
- 5.2.19. If deficiencies are found in the program, the program will be revised, and personnel will be trained in the new revisions before subsequent entries are authorized.
- 5.3. Pre-Job Planning and Space Preparation
 - 5.3.1. The Entry Supervisor must determine that the confined space is properly isolated by blinding, disconnecting, and/or by following local Lockout/Tagout procedures.
 - 5.3.2. The Entry Supervisor must discuss with all Entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.
 - 5.3.3. Eliminate any condition making it unsafe to open the equipment to atmosphere. Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.
 - 5.3.4. If applicable, wash, steam, ventilate or degas the confined space to properly free it of contaminants. Vent vapors to a safe location.
 - 5.3.5. Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent entry of unauthorized Entrants.

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- 5.3.6. If performing hot work in the confined space, precautions must be taken consistent with the Company Hot Work Permit procedure.
- 5.3.7. Ensure that vehicle or other equipment exhaust does not enter the space.
- 5.4. Pre-Entry Safety Meeting
 - 5.4.1. The Entry Supervisor must declare when the confined space is ready for entry.
 - 5.4.2. The Entry Supervisor shall hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized Entrant(s) and Attendant(s) involved with the entry. He/she will discuss other concerns such as previous contents, vessel coating, PPE required etc., during this meeting.
 - 5.4.3. The Entry Supervisor must coordinate entry operations when employees of more than one Company are working simultaneously in the confined space. This coordination is necessary so that one Company's work does not endanger the employees of another Company.
- 5.5. Equipment
 - 5.5.1. Check all work equipment to ensure that it has the proper safety features and is approved for the locations where it will be used. The Entry Supervisor shall ensure that all equipment is properly maintained in a safe condition and that Entrants use the equipment properly. The following equipment must be considered and may be required when entering a confined space:
 - 5.5.2. Atmospheric Testing and Monitoring Equipment.
 - 5.5.3. Barriers, Shields, and Signs – Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Any signs used must state “Danger – Permit Entry Confined Space” along with the proper warning word such as “Asphyxiant, Flammability or Toxic Hazard”. All barricades must be capable of preventing a person from inadvertently walking into or kicking an object into the space.
 - 5.5.4. Communications Equipment – Only use intrinsically safe equipment in areas where a hazardous atmosphere may exist. Use a communication system that will keep the Attendant in constant, direct communication with the Entrant(s) working in the confined space. Also, use a communication system that allows the Attendant to summon help from rescue or emergency services.
 - 5.5.5. Entry and Exit Equipment – (For example: ladders may be needed for safe entry and exit). Lighting Equipment – Needed for safe entry, work within the space and exit. Lighting equipment used in the confined space must be certified safe for the location.
 - 5.5.6. Portable electric lighting used in wet and/or other conductive locations (drums, tanks, vessels) must be operated at 12 volts or less. 120-volt lights may be used if protected by a ground-fault circuit interrupter.

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- 5.5.7. Personal Protective Equipment – Ensure that personnel wear the required personal protective equipment. For respiratory protection requirements, refer to the Respiratory Protection Program.
 - 5.5.8. Rescue and Emergency Equipment – Except if provided by outside rescue services.
 - 5.5.9. The Attendants must also have an approved first aid kit.
 - 5.5.10. Vacuum Trucks – When used, trucks must be properly grounded or bonded to prevent static sparks.
 - 5.5.11. Ventilating Equipment – Local exhaust air movers used to obtain acceptable atmospheric entry conditions (e.g., Copus air movers).
 - 5.5.12. Other – Any other equipment necessary for safe entry into and rescue from permit required confined spaces.
- 5.6. Air Monitoring
- 5.6.1. Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Monitoring of the space must inform the entrants of the potential hazards and results and they must participate in the permit review and signing.
 - 5.6.2. Air shall be periodically tested while continuous ventilation is applied.
 - 5.6.3. Any employee who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph. Employees or their representatives are entitled to request additional air monitoring at any time.
- 5.7. Ventilation
- 5.7.1. Continuous forced air ventilation must be used and tested as follows:
 - 5.7.2. An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
 - 5.7.3. The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space;
 - 5.7.4. The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
 - 5.7.5. The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing and may request additional monitoring at any time.

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5.7.6. If a hazardous atmosphere is detected during entry each employee shall leave the space immediately and the space shall be evaluated to determine how the hazardous atmosphere developed; and measures shall

5.7.7. be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

5.8. Multiple Employer Procedure

5.8.1. In order not to endanger the employees of any other employer, the Entry Supervisor shall:

5.8.1.1. Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the Company procedures pertaining to Confined Space.

5.8.1.2. 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.

5.8.1.3. Apprise the contractor of the elements, including the hazards identified and the employees experience with the space, that make the space in question a permit space.

5.8.1.4. Inform the contractor of any precautions or procedures that The Company has implemented for the protection of employees in or near permit spaces where contractor personnel will be working.

5.8.1.5. Coordinate entry operations with the contractor, when both The Company personnel and contractor personnel will be working in or near confined spaces.

5.8.1.6. Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in confined spaces during entry operations.

5.8.2. In addition to complying with the confined space requirements that apply to all employees; each contractor, who is retained to perform permit space entry operations, shall:

5.8.2.1. Obtain any available information regarding confined space hazards and entry operations from the Company Entry Supervisor.

5.8.2.2. Coordinate entry operations with the Company Entry Supervisor, when both the Company personnel and contractor personnel will be working in or near permit spaces.

5.8.2.3. Inform the Company of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.

5.9. Rescue and Emergency Services

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- 5.9.1. Rescue services must be on-site for immediately dangerous to life and health (IDLH) conditions while work is being performed. Rescue services must be either:
 - 5.9.1.1. Provided by the host facility,
 - 5.9.1.2. Provided by an outside service which is given an opportunity to examine the entry site, practice rescue and decline as appropriate, or
 - 5.9.1.3. Provided by The Company by selecting a rescue team that is equipped and trained to perform the needed rescue services.
- 5.9.2. The Company who designates rescue and emergency services shall evaluate a prospective rescuer's ability:
 - 5.9.2.1. To respond to a rescue summons in a timely manner, considering the hazard(s) identified,
 - 5.9.2.2. Their ability to function appropriately while rescuing entrants from the particular permit space,
 - 5.9.2.3. Inform each rescue team or service of the hazards they may confront when called on to perform rescue at the site and provide the rescue team or service selected with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.
- 5.9.3. The Attendant shall order the other Entrants not to move the injured nor allow untrained or unauthorized workers into the space that are not trained to handle a confined space rescue.
- 5.9.4. Safety Data Sheet's for substances that an injured Entrant was exposed to must be provided to the medical facility treating the injured worker.
- 5.10. Permit-Required Confined Space Rescue
 - 5.10.1. When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
 - 5.10.2. The Attendant shall prevent unauthorized personnel from attempting a rescue.
 - 5.10.3. After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.
 - 5.10.4. The preferred means of providing rescue service is through the use of a qualified outside rescue service vendor (client host). The outside rescue service vendor must be:
 - 5.10.4.1. Informed of the hazards that they may confront during a rescue;
 - 5.10.4.2. Provided access to the Permit-Required Confined Space to examine the entry site, practice rescue, and decline as appropriate.
 - 5.10.4.3. Access to the space allows the rescue service and local supervision to jointly develop appropriate rescue plans.

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- 5.10.4.4. If the host operator is designated to provide rescue services for The Company, the agreement of services must be included in contract for the job.
- 5.10.5. If the Company employees are to perform Permit-Required Confined Space rescues, they must be:
 - 5.10.5.1. Provided and trained in the use of the proper personal protective equipment necessary to make the rescue;
 - 5.10.5.2. Provided PPE at no cost to Trained to perform the assigned duties;
 - 5.10.5.3. Required to practice making 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 space or from representative permit spaces.
 - 5.10.5.4. Trained in basic first aid and CPR.
 - 5.10.5.5. A minimum of one member of the rescue team must hold a current certification in first aid and CPR.
- 5.11. Non-entry Rescue
 - 5.11.1. To facilitate non-entry rescue, an Entrant must be attached to a retrieval system whenever he/she enters a Permit-Required Confined Space with a vertical depth of more than 5 feet.
 - 5.11.2. The retrieval equipment is not required if it will increase the overall risk of the entry, e.g., creating an entanglement hazard, or will not contribute to the rescue of the Entrant.
 - 5.11.3. Each Entrant shall use a full body harness equipped with a “D” ring located between the shoulders or above the head.
 - 5.11.4. Wristlets may be used instead of the full body harness if the use of the full body harness is not feasible or creates a greater hazard and that using wristlets is the safest and most effective alternative.
 - 5.11.5. The retrieval line must be attached to the “D” ring and the other end of the retrieval line attached to a retrieval device or fixed point located outside the space so that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.
- 5.12. Issuance/Reviewing of Permit
 - 5.12.1. The Company shall implement the measures necessary to prevent unauthorized entry, identify and evaluate the hazards of permit spaces before employees enter them, and develop and implement the procedures necessary for safety permit space entry operations by:
 - 5.12.1.1. Specifying acceptable entry conditions, providing each authorized entrant the opportunity to observe any monitoring or testing,

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- 5.12.1.2. Isolating the permit space, purging, inserting, flushing, or ventilating the permit space to eliminate atmospheric hazards, providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards,
- 5.12.1.3. and verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
- 5.12.2. Only when all pre-entry requirements are satisfied, the Entry Supervisor shall issue a completed and signed confined space permit. The confined space permit is valid for one shift.
- 5.12.3. In the event of any unauthorized entry, employee complaints, a hazard not covered by the permit, the occurrence of an injury or near miss the entry permit shall be cancelled and a review shall be conducted to provide employee protection and for revising the program prior to authorizing subsequent entries.
- 5.12.4. An annual review of this program, using the cancelled permits retained within 1 year after each entry shall be conducted by the HSE Manager to revise the program as necessary, to ensure that employees are protected. If no confined space entries were performed during a 12-month period, no review is necessary.
- 5.13. Termination and Closing or Cancelling of Permits
 - 5.13.1. The Entry Supervisor shall terminate the confined space permit, at the end of the job operation, at the end of the shift or when the Entry Supervisor or Attendant determine that conditions in or near the confined space have changed and is hazardous to the Entrants.
 - 5.13.2. The Entry Supervisor shall, at the conclusion of entry operation, close out the permit and provide the safety department with the original copy of the Confined Space Permit.

6. Training

- 6.1.1. Training shall be provided so that all employees whose work is regulated by this program acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them.
- 6.1.2. Training shall be provided to each affected employee, prior to the employee's first assigned duties under this program if a new hazard has been created or special deviations have occurred and before there is a change in assigned duties.
- 6.1.3. The employee shall be retrained:
 - 6.1.3.1. Whenever there is a change in confined space operations that presents a hazard about which an employee has not previously been trained.
 - 6.1.3.2. Whenever the supervisor has reason to believe either that there are deviations from the permit space entry procedures required by this section or that there are inadequacies in the employee's knowledge or use of these procedures.

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- 6.1.4. The training shall establish employee proficiency in the duties required by this program and the Company shall review the program yearly and introduce new or revised procedures, as necessary.
- 6.1.5. The supervisor shall certify that the training required by this program has been accomplished.
- 6.1.6. The training documentation shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.
- 6.1.7. The training documentation shall be available for inspection by employees, their authorized representatives, management, clients, and the safety department.

7. Reference

- 7.1. OSHA – 1910.146 App F – 63 FR 66039, Dec. 1, 1998. 1910.146 App F.
- 7.2. OSHA – 1910.146 App B – 58 FR 4549, Jan. 14, 1993; 58 FR 34846, June 29, 1993.

8. Appendix

- 8.1. Safe Work Permit
- 8.2. Confined Space Determination Checklist
- 8.3. Confined Space Entry Permit
- 8.4. Atmospheric Testing of Permit-Required Confined Spaces
- 8.5. Confined Space Rescue – Selection Criteria for Onsite or Contract Rescue Services

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APPENDIX 8.1 SAFE WORK PERMIT

Site:		PTW #:	
Date:		Time:	

Work Requested By:		Date of Request:	
Type of Permit Requested: (Check one)			
<input type="checkbox"/>	General Hot Work	<input type="checkbox"/>	Electrical Isolation
<input type="checkbox"/>	Confined Space Entry	<input type="checkbox"/>	Man-riding
<input type="checkbox"/>	Mechanical Isolation	<input type="checkbox"/>	Explosives
<input type="checkbox"/>	Work Over Water	<input type="checkbox"/>	High Pressure Work
<input type="checkbox"/>	Radioactive Sources	<input type="checkbox"/>	Other
Reason for Work Permit Request		<input type="checkbox"/>	Breakdown Repair
<input type="checkbox"/>	Planned Maintenance	<input type="checkbox"/>	Upgrade of Equipment
<input type="checkbox"/>	New Installation	<input type="checkbox"/>	Other (specific)

Description of work to be done:

Worksite Supervisor Instructions:

Precautions to be taken: (Specify and reference reviewed TRA's & the appropriate checklists to be attached to this Work Permit)

Validity Period: (must not exceed end of tour)

From - Date: _____ **Time:** _____ **To - Date:** _____ **Time:** _____

Permit Authorization:

Work Supervisor Name, Title / Signature: _____ / _____

Operator Representative, Title / Signature: _____ / _____

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This work permit becomes invalid and must be returned if:			
A general alarm is sounded	<input type="checkbox"/>	Work scope or area needs to be changed	<input type="checkbox"/>
		Any new hazards are identified	<input type="checkbox"/>
In order to safely perform the work authorized by the Worksite Supervisor and as directed by the Work Supervisor, this permit is issued to the following workers who understand the conditions of this permit.			
Name & Position (Print):	&	Signature:	
Name & Position (Print):	&	Signature:	
Name & Position (Print):	&	Signature:	
As the Work Supervisor and permit holder, I have inspected the worksite and affirm the safety precautions specified by the Worksite Supervisor have been taken and authorize this Work Permit to go into effect:			

Work Permit Termination:

Check as appropriate:	
<input type="checkbox"/>	The work requested and authorized has been completed and the work site has been returned to its normal safe condition
<input type="checkbox"/>	The work has not been completed and the following remains outstanding:
Work Supervisor's Name:	
Worksite Supervisor – Sign Off:	
Operator Representative - Sign Off:	

Received by:

Date:

Time:

Name: (Print):

Signature: _____

Comments:

Permit checked by: (Name)		Time	
Permit checked by: (Name)		Time	

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APPENDIX 8.2 Brunel Energy, Inc. CONFINED SPACE DETERMINATION CHECKLIST

Before entering any space that may be considered a confined space, this checklist shall be reviewed:			Yes	No
1.	Is there limited entry/exit where the employee will be working?			
	1.1	Will employee(s) climb or crawl into, down, and/or up to a work area where egress would be limited?		
	1.2	Does this task entail manufacturing, repairing, or inspection of the inside of: vessels, tanks, crankcases, large pipes, etc.?		
2.	Is or will there be hazards present (in the above "space") when performing the task of inspection, manufacturing and / or repairing?			
	2.1	Are there any gases, liquids, chemicals, materials and/or substances that are flammable or toxic or could cause engulfment in the "space"?		
	2.2	Is there a chance of entrapment by something collapsing in the "space"?		
	2.3	Are there any hazardous materials in the "space"?		
	2.4	Will tooling used during the task cause a primary hazard?		
	2.5	Will tooling used during the task cause a secondary hazard?		
	2.6	Will the oxygen level ever be out of limit (below 19.5% or above 23.5%)?		
If the answers in either section are all "NO" – This is not a Confined Space – No Permit is required.				
If there are "YES" answers in either Section 1 or 2, the "space" is considered a Confined Space. Continue with Sections 3 and 4 to determine if a permit for entry is required.				

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Before entering any space that may be considered a confined space, this checklist shall be reviewed:			Yes	No
3.	Will the above hazards (marked YES) be eliminated?			
3.1	If there is/were flammables or toxins in the space, have they been eliminated? (Document HOW in Section 4)			
3.2	If there is a chance of the "space" collapsing, has it been braced with good engineering practices? (Document HOW in Section 4)			
3.3	Is the area has had unknown material, has the space been tested for such and the levels determined by be acceptable? (Document RESULTS in Section 4)			
3.4	If tooling could create a primary or secondary hazard, have the following measures be taken:			
3.4.1	Have all hoses and cords used, passed check for leaks/damage, and carefully routed to prevent cutting and fraying?			
3.4.2	Are all power cords in use, protected with GFCI that is functional?			
3.4.3	If noise level will be over 90 decibels, will employee be wearing hearing protection?			
3.4.4	If heat/fumes from cutting/welding operations could be a hazard, have tests been conducted proving it is not or proving that adequate power ventilation is used?			
3.5	Will the oxygen level remain between (19.5% - 23.5%)			

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4.1	What is LEL level? (Must be 0.0 LEL otherwise Entry Permit required)	
4.2	If toxics, how is "space" proven safe for entry?	
4.3	Is there a chance of the "space" collapsing, how has it been braced?	
4.4	If there is/were unknown substances in the space, document test results below?	
	Norm Test Results	Conducted By
	H ₂ S Test Results	Conducted By
	Lead Base Paint Results	Conducted By
	Galvanizing Respirator Used	Approved By
4.5	If hearing protection is NOT WORN, noise level test results?	
	Audio Level	Conducted By
4.6	If heat, fumes, or lack of oxygen could be a hazard, ventilation to control this hazard is documents below:	
	Oxygen level during task remains at	% O ₂
	Temperature inside remains at	°F
	Employee complains of no fumes/smell?	
	Powered ventilations	CFM is placed
If the answers to ALL Section 3 questions are yes, then it is NOT considered to be a permit-required confined space.		
	Job No.:	
	Date:	
	Description:	

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APPENDIX 8.3 CONFINED SPACE ENTRY PERMIT

Confined Space Location/Description/ID Number: _____ **Date:** _____

Purpose of Entry:

Time In: _____ **Permit Canceled Time:** _____

Time Out: _____ **Reason Permit Canceled:** _____

Supervisor: _____

Rescue and Emergency Services:

Hazards of Confined Space	Yes	No	Special Requirements	Yes	No
Oxygen deficiency			Hot Work Permit Required		
Combustible gas/vapor			Lockout/Tagout		
Combustible dust			Lines broken, capped, or blanked		
Carbon Monoxide			Purge-flush and vent		
Hydrogen Sulfide			Secure Area-Post and Flag		
Toxic gas/vapor			Ventilation		
Toxic fumes			Other- List:		
Skin- chemical hazards			Special Equipment		
Electrical hazard			Breathing apparatus- respirator		
Mechanical hazard			Escape harness required		
Engulfment hazard			Tripod emergency escape unit		
Entrapment hazard			Lifelines		
Thermal hazard			Lighting (explosive proof/low voltage)		
Slip or fall hazard			PPE- goggles, gloves, clothing, etc.		
			Fire Extinguisher		

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Communication Procedures:

DO NOT ENTER IF PERMISSABLE ENTRY LEVELS ARE EXCEEDED		Test Start and Stop Time:	
Permissible Entry Level		Start	Stop
% of Oxygen	19.5 % to 23.5 %		
% of LEL	Less than 10%		
Carbon Monoxide	35 PPM (8 hr.)		
Hydrogen Sulfide	10 PPM (8 hr.)		
Other			

Name(s) or Person(s) testing:

Test Instrument(s) used- Include Name, Model, Serial Number and Date Last Calibrated:

CFM-Ventilation	Size-Cubic Feet	Pre-Entry Time	<input type="checkbox"/> Central Notified Before Entrance	Time Notified:
			<input type="checkbox"/> Central Notified After Entrance	Time Notified:

Authorized Entrants

Authorized Attendants

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PERMIT AUTHORIZATION I Certify that all actions and conditions necessary for safe entry have been performed.	
Name-Print:	
Signature:	
Date:	Time:

Entry Procedure Checklist: Complete the following steps before, during, and after a confined space entry:

Step 1

Obtain a Permit-Confined Space Entry Form from Program Coordinator.

Step 2

Notify Supervisor before the Confined Space Entry

Step 3

Verify Confined Space Meter has been calibrated and is in working order

Step 4

Complete the top portion of the Permit-Confined Space Entry Form

Step 5

Ensure all rescue equipment (e.g. tripod, body-belt, lanyard) is in place prior to entry

Step 6

Monitor the confined space with the MSA 4-Gas Detector prior to entry. The entrant and attendant should sign the permit authorization section on the bottom of the permit to ensure all actions and conditions necessary for safe entry have been performed.

Step 7

Employee entering the confined space should wear the 4-Gas Detector after the pre-atmosphere test. The employee should also have a full body harness and lanyard attached to the rescue tripod. Employee shall have a radio and any other necessary personal protective equipment.

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Step 8

Employee can enter the confined once Step 7 is completed. The entrant and attendant should complete the Hazards of Confined Spaces and Special Requirements Section of the Permit-Confined Space Entry Form once the employee is within the confined space. The entrant should also gather the % Oxygen, % Explosive Gases, Carbon Monoxide, and Hydrogen Sulfide readings and communicate them to the attendant to place on the Permit Form.

Step 9

The attendant should maintain constant communication with the entrant until the entrant has exited the confined space.

Step 10

The attendant should contact the Supervisor once the entrant has exited the confined space.

Step 11

The Permit-Confined Space Entry Form should be given to the program coordinator, to file in the Confined Space Records.

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APPENDIX 8.4 ATMOSPHERIC TESTING OF PERMIT-REQUIRED CONFINED SPACES

Atmospheric testing of permit-required confined spaces is used so you can do both of the following:

1. Evaluate potential atmospheric hazards.
2. Verify that acceptable atmospheric entry conditions exist.

Evaluate Hazards

- Collect and analyze data on the atmosphere of your space using equipment that’s sensitive enough and specific enough for any hazardous atmosphere that may arise. This will enable you to:
 - Develop appropriate entry procedures.
 - and**
 - Maintain acceptable entry conditions.
- Have a technically qualified individual perform, or at least review, the following:
 - Evaluate and interpret the data.
 - Identify all serious hazards.
 - Develop appropriate entry procedures.

Note:

Examples of technically qualified individuals include:

- WISHA industrial hygiene consultant
- Qualified industrial hygienist
- Qualified registered safety engineer
- Qualified safety professional

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Verify that Acceptable Entry Conditions Exist

Verify that acceptable entry conditions exist by doing the following:

- If the space may contain a hazardous atmosphere, test for all potential contaminants.
 - Use the equipment specified on your permit, for the time specified by the manufacturer, to determine whether contaminants are within the range of acceptable entry conditions.
 - Measure for the time recommended by the manufacturer.
- Perform tests in this order:
 - First, perform a test for oxygen. Most combustible gas meters are oxygen dependent and will not provide reliable readings in an oxygen-deficient atmosphere.
 - Next, test for combustible gases. They present an immediate threat to life, through inhalation, fire, or explosion.
 - Last, if necessary, test for toxic gases and vapors.
- Record test results, such as the actual concentration, in the appropriate space on the permit.
 - When monitoring atmospheres that may be stratified, also do the following:
 - Test the atmospheric envelope at a distance of approximately 4 feet (1.22 m) in the direction of travel, and to each side.
 - If using a sampling probe, adapt the entrant's rate of progress to the sampling speed and detector response.

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APPENDIX 8.5 CONFINED SPACE RESCUE – SELECTION CRITERIA FOR ONSITE OR CONTRACT RESCUE SERVICES

INSTRUCTIONS	
Use this form to (1) determine if the PRCS operation requires a "standby" rescue service (i.e., rescuers that are physically present during PRCS operations); and (2) to perform a preliminary evaluation of the "capabilities" of both prospective and current rescue teams (i.e., evaluate a rescuer's ability to respond to a rescue summons in a timely manner and determine if the rescuer has the skills, knowledge, and equipment for the needed rescue services).	
SECTION 1: GENERAL INFORMATION	
Type of Rescue Service: <input type="checkbox"/> Onsite Rescue Team (e.g., controlling employer's own employees) <input type="checkbox"/> Contract Rescue Service (Specify: _____)	Date: _____ Preliminary Review Results: <input type="checkbox"/> Meets all requirements <input type="checkbox"/> Does not meet all requirements (summarize below)
Contact Person: _____ Telephone No.: _____ Other Information: _____ _____ _____ _____ _____ _____ _____	Comments: _____ _____ _____ _____ _____ _____ _____ Reviewer (e.g., Onsite Safety Officer): _____ _____
SECTION 2: SELECTION OF ONSITE OR OFFSITE RESCUERS	
1. How much time can be tolerated to physically initiate rescue? _____ _____ _____	
2. Do you need someone on site, or can you legitimately use an offsite rescue service? _____ _____ _____	
<i>Note: If the required response time is less than 5 minutes, standby rescue is required (i.e., the rescuers must be physically present at the response site during PRCS operations).</i>	
3. If you need to use an onsite rescue service, complete Section 3 below.	
4. If you need to contract with an offsite rescue service, complete Section 4 below.	

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SECTION 3: ONSITE RESCUE SERVICE REQUIREMENTS

For an onsite rescue service (e.g., a controlling employer's own employees), does the service meet the requirements of OSHA's PRCS standard [\[1910.146\(k\)\(2\)\]](#)? _____

Requirements include:

- Equipped with the PPE needed to conduct PRCS rescues
- Proficient in the use of the PPE
- Trained to perform assigned rescue duties and proficient as authorized entrants
- Trained in first aid/CPR
- Practice simulated PRCS rescues at least annually

SECTION 4: SELECTION CRITERIA FOR A CONTRACT RESCUE SERVICE

1. How quickly can the prospective rescue service get from its location to the PRCS (i.e., how much time will it take for the rescuers to receive notification, arrive at the scene, set up, and be ready for entry)? _____

Factors to consider:

- Location of the rescue service relative to the response site
- Quality of roads and highways to be traveled
- Potential traffic congestion
- Reliability of rescuer's vehicles
- Training and skill of rescuer's drivers

2. What is the availability of the prospective rescue service? _____

Factors to consider:

- Unavailable at certain times of the day or in certain situations
- Likelihood that key rescue personnel might be unavailable at times
- Capable of notifying the employer if rescue service becomes unavailable while an entry is underway

3. Is the prospective rescue service willing to perform rescues at the response site? _____

4. Can a rescue request be transmitted to the rescue service without delay (i.e., is there an adequate means of communication between the attendant, employer, and the prospective rescue service)? _____

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<p>5. How soon after notification can the prospective rescue service dispatch a rescue team to the entry site? _____</p> <p>_____</p> <p>_____</p>
<p>6. If the PRCS has a vertical entry over 5 feet in depth, can the prospective rescue service properly perform entry rescues? _____</p> <p>_____</p> <p>_____</p>
<p>7. Does the prospective rescue service have the technical knowledge and equipment to perform rope work or elevated rescue, if needed? _____</p> <p>_____</p> <p>_____</p>
<p>8. Does the prospective rescue service have the necessary skills and procedures for medical evaluation, patient packaging, and emergency rescue and response? _____</p> <p>_____</p> <p>_____</p>
<p>9. Does the prospective rescue service have the necessary equipment to perform rescues (including an ample supply of replacement cylinders for SCBAs, if required for the PRCS), or must the equipment be provided by the employer or another source? _____</p> <p>_____</p> <p>_____</p>
<p>Other Comments/Overall Evaluation: _____</p> <p>_____</p> <p>_____</p>