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Subcontractors	Program Requirements Document	For Additional Info: http://EDMS	Effective Date: 04/18/23
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Manual: Subcontractor Requirements

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*The current revision can be verified on EDMS.

1. PURPOSE

This document provides guidance for the implementation of a *confined space* (see def.) *entry* (see def.) program by subcontractors performing construction work at the Idaho Cleanup Project (ICP) to ensure that subcontractor employees are protected from existing or potential hazards that may be encountered in confined spaces. This document implements requirements from codes and standards along with *contractor* (see def.) requirements. All applicable regulatory or contractor requirements must be followed, with the most stringent requirement being met.

2. APPLICABILITY

This procedure applies to all subcontractors at the ICP whose employees are assigned to a worksite with one or more confined spaces. Stricter requirements may be imposed by subcontractors upon their employees or subtier contractors. The requirements of this document must be followed by subcontractors; however, the means of implementation may vary as determined by the subcontractor.

Subcontractors performing work in ICP-controlled confined space(s) shall follow MCP-2749, “Confined Space Entry Program,” under the following conditions:

- Subcontractor does not have their own confined space program that meets the requirements contained in this document

OR

- Subcontractors performing work in ICP confined space(s) where ICP and subcontractor personnel will be working in or near the space, including support of subcontractor work in the space(s) by ICP Safety, Health, Quality and Security (SHQ&S), fire, environmental, skilled trades, or other personnel.

Subcontractors working in confined spaces, which does not involve ICP employees either working in or near, or supporting, the confined space operations, may work in accordance with subcontractor’s confined space program on a case-by-case basis, following review and approval by the ICP Confined Space SME of the subcontractor’s written confined space program and supporting documentation, such as training records. Subcontractors exercising this option must provide a copy of their written program along with supporting documentation to the ICP Confined Space SME via the Subcontractor Technical Representative.

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Subcontractor work in confined spaces is subject to inspection/verification by ICP to verify subcontractor compliance with requirements.

3. REQUIREMENTS

3.1 General

- 3.1.1 Subcontractors whose ICP worksites contain one or more confined spaces shall implement a written *permit space* (see def.) program that meets the requirements of 29 *Code of Federal Regulations* (CFR) 1926.1204, “Permit-Required Confined Space Program,” and other applicable provisions found in 29 CFR 1926, Subpart AA, “Confined Spaces in Construction.” Such a program shall address the following:
- A. Designation of a competent person to identify and evaluate the hazards of permit spaces before employees enter them
 - B. Use of an entry permit that documents the information listed in 29 CFR 1926.1206 (a) through (p)
 - C. The means, procedures and practices necessary for permit space entry operations, including:
 1. Specifying acceptable entry conditions
 2. Providing each authorized entrant, or their authorized representative, with the opportunity to observe monitoring or testing of permit spaces
 3. Isolating the permit space, and the physical hazards within the space
 4. Purging, inerting, flushing, or ventilating permit spaces as necessary to eliminate or control atmospheric hazards
 5. Using of monitoring systems/procedures that continuously/periodically monitor conditions and that will detect an increase in atmospheric hazard levels in sufficient time for entrants to exit the space
 6. Providing pedestrian, vehicle or other barriers to protect permit space entrants from external hazards
 7. A means for verifying, throughout the duration of an entry into a permit space, that conditions in the permit space are acceptable for entry

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8. Use of personal protective equipment that will provide effective and appropriate protection for employees working in the permit space
 9. Elimination of conditions that could make it unsafe to open or remove an entrance cover to a permit space
 10. Use of an early-warning system that continuously monitors for nonisolated engulfment hazards that will alert personnel in sufficient time to safely exit from the space
 11. Providing properly maintained and functioning equipment for the following:
 - a. Ventilation of permit spaces
 - b. Testing and monitoring equipment
 - c. Communications equipment for use by attendants for monitoring the condition of entrants, including entrants in multiple spaces; and for summoning emergency rescue assistance
 - d. Supplemental lighting
 - e. Equipment needed for safe ingress and egress by authorized entrants
 - f. Rescue and emergency equipment needed for nonentry rescue, except for equipment provided by rescue services.
- 3.1.2 For activities involving confined space operations where both ICP and subcontractor personnel will be working in or near permit spaces, all personnel shall follow MCP-2749.
- 3.1.3 Subcontractors shall inform the STR at the conclusion of confined space entry operations of any hazards that were confronted or created during entry operations; STR will share this information with the ICP facility manager.
- 3.1.4 Subcontractors will be provided with a copy of a completed, current confined space hazard evaluation form for any ICP-controlled confined spaces that subcontractor employees must enter.

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- 3.1.5 The STR will inform subcontractors of any precautions or procedures that have been implemented for protection of subcontractor employees working in or near ICP-controlled permit spaces.
- 3.1.6 An inventory of permit spaces controlled by the subcontractor shall be maintained at the worksite, along with a completed hazard evaluation of each permit space. A copy of the permit space inventory and completed hazard evaluations must be provided to the STR.
- 3.1.7 Permit spaces must be marked with signs that read “DANGER – PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER” or use other similar language.
- 3.1.8 Permit required confined spaces shall be marked with a “DANGER” sign as described in PRD-2022, “Safety Signs, Color Codes, and Barriers.”
- 3.1.9 After completion of work in a permit space, a copy of the canceled entry permit shall be sent to the STR.
- 3.1.10 A copy of the subcontractor’s canceled confined space entry permit(s) shall be provided to the ICP Confined Space SME for inclusion in the annual confined space program review.

3.2 Rescue and Emergency Services

- 3.2.1 Subcontractor shall designate and use rescue services in accordance with 29 CFR 1926.1211, “Rescue and Emergency Services.”
- 3.2.2 Use of Idaho National Laboratory (INL) Fire Department rescue services shall be as coordinated through the STR. INL Fire Department notifications shall be in accordance with MCP-2749.

4. DEFINITIONS

Confined space. A space that (a) is large enough and so configured that an employee can bodily enter and perform assigned work; and (b) has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and (c) is not designed for continuous employee occupancy.

Contractor. Idaho Environmental Coalition, LLC, and all of its duly authorized representatives acting in their professional capacity, in the performance of work at the ICP at the INL.

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Entry. The action by which any part of the body breaks the plane of an opening that is large enough to allow the worker's entire body to pass into a permit-required confined space. Entry is considered to have occurred regardless of whether there is intent to fully enter the space.

Permit-required confined space (permit space). A confined space that has one or more of the following characteristics: (1) contains or has a potential to contain a hazardous atmosphere; (2) contains a material that has the potential for engulfing an entrant; (3) has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section; or (4) contains any other recognized serious safety or health hazard.

5. REFERENCES

29 CFR 1910.146, "Permit-Required Confined Spaces"

29 CFR 1926.1204, "Permit-Required Confined Space Program"

29 CFR 1926, Subpart AA, "Confined Spaces in Construction"

29 CFR 1910.252, Subpart Q, "Welding, Cutting and Brazing-General Requirements"

MCP-2749, "Confined Space Entry Program"

PRD-2022, "Safety Signs, Color Codes, and Barriers"

6. APPENDIXES

None