Confined Space Entry Guidelines For Contractors
(Excerpted from CU Confined Space Policy)

A. Introduction:
Contractors, subcontractors and their employees working at Columbia facilities who may be required to
enter into confined spaces to perform assigned duties are responsible for developing and enforcing a
comprehensive Confined Space Entry Program in accordance with the requirements of Occupational
Safety and Health Administration (OSHA) Confined Space regulation 29 CFR 1910.146 and Columbia
policy. Under no circumstances shall these guidelines be considered as a substitute of the Contractor’s
confined space program.

The intent of contractor’s confined space program must be to eliminate potential accidental injuries and
death associated with entry and working in confined spaces by training employees of the hazards
associated with such work areas and outlining necessary safe work practices, as well as compliance with
all applicable regulations. The Contractor’s program must address those issues and reinforce them
through employee education and a continuous confined space monitoring program.

B. Types Of Confined Spaces:
A Confined space, as defined in the OSHA regulations and Columbia Confined Space Entry Policy, has
limited access for entry or exit but is large enough and so configured that an employee can bodily enter
and perform assigned task. Such spaces include, but are not limited to, storage tanks, reaction and process
vessels, pits, silos, vats, degreasers, boilers, ventilation and exhaust ducts, sewers, tunnels, underground
utility vaults, and pipelines. These spaces have the potential for causing injury and/or illness if preventive
measures are not used.

There are two types of confined spaces that are present on Columbia premises; Non-Permit Confined
Spaces (NPCS) and Permit-Required Confined Spaces (PRCS). As stated in the policy, PRCS are labeled
with “DANGER – Confined Space – Entry by Permit Only” signs, respectively. Additionally, NPCS may
be designated by labeled “DANGER – Confined Space” at individual campuses. Any employee of a
contractor entering into NPCS for preventative maintenance and repairs must follow their company
policy. At no time shall an employee of the contractor enter into PRCS without an authorized permit
issued by the contractor’s Entry Supervisor.

C. Procedure For Entry Into Permit Required Confined Spaces:
The contractor shall develop written entry permit procedures as a part of their confined space program in
accordance with the OSHA regulations and Columbia Confined Space Entry Policy (see Sections E).

D. Medical Guidelines:
There are no specific requirements for medical clearance under the OSHA regulations for entry into a
confined space unless the employee is using a respirator, then fit testing is required per OSHA standard
29 CFR 1910.134. It is Contractor’s responsibility to ensure that the person entering into a confined space
is fit for such duty.

E. Training:
The Contractors training must comply with applicable OSHA requirements and shall also cover site
specific hazards encountered at the confined space, how to use PPE and follow safe work practices. The
Columbia Confined Space Entry policy outlines training topics that must be included in the contractor’s
comprehensive training program.

F. Responsibilities
1. Contractors
   a. Must contract all PRCS related work at any Columbia campus through Facilities Management;
   b. Must provide the following to Facilities at their request;
      i. Copy of Contractor’s Confined Space Program;
      ii. Copy of Contractor’s Health & Safety Plan, if required;
      iii. List of contractor’s personnel assigned to perform work and their role;
         1. Authorized Entrant
         2. Entry Attendant
         3. Fire Watch, if needed
      iv. Evidence of training of contractor’s employees for Confined Space Entry;
      v. MSDSs for all products to be used for work activities.
   c. Must discuss with Facilities the nature of work, possible dates when the work will be performed, potential hazards associated with such work like explosion, health and safety issues, other logistics, etc.;
   d. Must arrange a face-to-face meeting with Facilities and the personnel entering into the PRCS and Attendant to review work assignments;
   e. Must clean up the area at the end of each shift;
   f. Must inform employees to strictly observe all applicable university policies, like not smoking, access routes, use of facilities, etc., and ensure their adherence to these rules;
   g. Must inform Facilities if any regulatory agency personnel visits the area;
   h. Must immediately report incidents and accidents to the Facilities;
   i. Must debrief Facilities at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations.

2. Facilities
   a. Inform the contractor that the workplace contains PRCSs and that PRCS entry is allowed only through compliance with a contractor PRCS entry program;
   b. Apprise the contractor of the elements, including the hazards identified, established control procedures and Columbia experience with the space, that make the space in question a PRCS;

NOTE: The Facilities Entry Supervisor may terminate the work activity if it becomes apparent that safe work practices and other safety conditions are not being met or if conditions suddenly change or new hazards are introduced.

G. Recordkeeping
The contractor shall be responsible for maintaining all permits issued/or cancelled for one year per requirements of OSHA regulations and as agreed upon by Facilities. All medical clearance, fit testing and other records of employees shall be maintained by the contractor.

H. References:
2. Columbia Confined Space Entry Program