



Subject: **CONFINED SPACE ENTRY**

Policy No. 153

**APPLICATION**

New York University

**PURPOSE**

The purpose of New York University's Confined Space Entry Program is to protect employees from the hazards of entry into permit-required confined spaces and to comply with the Occupational Safety and Health Administration (OSHA) Confined Space Entry Final Rule, 29 CFR 1910.146.

**PART I: GENERAL INFORMATION**

1.0 Definitions

- 1.1 **Confined Space** is a space that: 1) is large enough and so configured that an employee can bodily enter and perform assigned work; 2) has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, vaults and sewers are spaces that may have limited means of entry); and 3) is not designed for continuous employee occupancy.
- 1.2 **Permit-Required Confined Space** is a space that: 1) contains or may contain hazardous Atmospheres; 2) contains a material that can engulf an entrant; 3) has an internal configuration that can trap or asphyxiate an entrant; 4) has any other serious health or safety hazard.
- 1.3 Affected employees: Facilities and Construction Management (FCM), Residential Managing company (currently Cooper Square Realty), Law School Housing Facility, who may enter a permit-required confined space.

2.0 Responsibilities

- 2.1 Responsibilities of the Director of Environmental Health & Safety or his or her designee.
  - 2.1.1 Developing the Confined Space Entry Program.
  - 2.1.2 Reviewing confined spaces identified by Facilities Management to determine whether they are permit-required confined spaces.
  - 2.1.3 Providing information on the use of personal protective clothing and equipment, as necessary.
  - 2.1.4 Conducting periodic audits to evaluate the effectiveness of the Confined Space Entry Program.
- 2.2 Responsibilities of Facilities Management, Law School Housing Director or designee

ISSUE DATE	REPLACES	ORIGINATOR	APPROVAL
11/07	11/05	ENVIRONMENTAL HEALTH & SAFETY	

Subject: **CONFINED SPACE ENTRY**

Policy No. 153

- 2.2.1 Identifying all confined spaces, as defined in Section 1.1, and alerting Environmental Health & Safety to their existence for inclusion in the Confined Space Entry Program.
- 2.2.2 Arrange for and ensuring that all University employees (FCM) who are included in the Confined Space Entry Program attend the annual awareness training provided by Facilities & Construction Management (FCM) and Environmental Health & Safety in confined space entry and the use of personal protective clothing and equipment, as necessary. Currently, University employees do not enter permit-required confined spaces.
- 2.2.3 Ensuring that the Confined Space Entry Program is implemented.
- 2.2.4 Ensuring that personal protective clothing and equipment, atmospheric testing equipment and retrieval equipment are available to all University employees who enter into Confined Spaces .
- 2.2.5 Enforcing the requirements of the Confined Space Entry Program.
- 2.2.6 Ensuring that outside contractors who perform work in permit-required confined spaces within University facilities comply with the NYU Confined Space Entry Program.

### 2.3 Central Heating Plant (CHP) Director or Designee

- 2.3.1 Ensuring that all confined spaces, as defined in Section 1.1, are identified and included in the Confined Space Entry Program.
- 2.3.2 Ensuring that all Plant employees who are included by the Confined Space Entry Program are trained in confined space entry and the use of personal protective clothing and equipment.
- 2.3.3 Ensuring that the Confined Space Entry Program is implemented.
- 2.3.4 Ensuring that personal protective clothing and equipment, atmospheric testing equipment and rescue and retrieval equipment are available to all Plant employees who are included in the Confined Space Entry Program.
- 2.3.5 Enforcing the requirements of the Confined Space Entry Program.
- 2.3.6 Ensuring that outside contractors who perform work in permit-required confined spaces within the Plant comply with the Confined Space Entry Program.

### 3.0 Confined Space Identification

- 3.1 Facilities Management , CHP Director, Law School Housing Director or designee will identify all confined spaces located within University facilities. The Director of Environmental Health & Safety or his or her designee will review confined spaces identified by Facilities Management / CHP to determine which confined spaces are permit-required confined spaces. Facilities Management will post a warning sign on every identified permit-required confined space within University Facilities. A permitted confined space that may be entered by University employees will be identified with a warning sign indicating: DANGER, CONFINED

**Subject: CONFINED SPACE ENTRY**

Policy No. 153

SPACE, ENTER BY PERMIT ONLY. Non-permitted confined spaces shall be identified with a warning sign indicating: DANGER, CONFINED SPACE. Confined spaces that shall not be entered by University employees under any circumstances will be identified with a warning sign indicating: DANGER, CONFINED SPACE, DO NOT ENTER.

#### 4.0 Confined Space Entry Permit

- 4.1 A confined space entry permit (Appendix A) must be completed and signed prior to entry into any permit-required confined space. The permit shall be numbered in such fashion: year and a sequential number following (e.g., 2007-01, which would be the first permit issued in 2007. The next one being 2007-02 and so forth). The Facilities Engineer, Facilities Manager or CHP Director must sign the confined space entry permit to authorize permit-required confined space entry. (See Appendix B for instructions on preparing a confined space for entry and completing the confined space entry permit.)
- 4.2 After the permit is signed, the original copy is posted at the permit-required confined space to be entered until the permit is no longer valid (see Section 4.3). A duplicate copy of the permit must be retained by the Facilities Manager. The University employee(s) who entered the permit-required confined space must return the original copy of the permit to the Facilities Manager when the permit becomes invalid. The Facilities Manager must match both copies of the permit and send them to the Environmental Health & Safety Department on a daily basis.
- 4.3 A confined space entry permit is valid until the end of the entrants' work shift or until the work is completed, whichever occurs first; or until an emergency involving or affecting the permit-required confined space occurs.
- 4.4 The Environmental Health & Safety Department will evaluate all confined space entry permits daily to ensure compliance with the Confined Space Entry Program and make recommendations for changes as necessary.
- 4.5 Where possible, Facilities Management/CHP/Law School Housing shall notify Environmental Health & Safety of any permitted confined space entry work with as much prior notice to the work actually occurring.

#### 5.0 General Confined Space Entry Procedures

- 5.1 When the Facilities Manager/CHP Director /Law School Housing Director has determined that a permit-required confined space must be entered, the Facilities Engineer will initiate and complete a confined space entry permit. Where possible, notification to Environmental Health and Safety will be made with as much notice as possible so procedures can be reviewed.
- 5.2 The Facilities Manager/ CHP Director/ Law School Housing Director will assign an employee(s) to enter the permit-required confined space and an attendant to observe outside the permit-required confined space when an employee(s) is inside the permit-required confined space.
- 5.3 The Facilities Manager/Engineer/CHP Director/ Law School Housing Director or designee will have the confined space prepared for entry. The Facilities Engineer will check that the employee entrant(s) have been equipped with the appropriate safety equipment.
- 5.4 The Facilities Engineer/CHP Director/Law School Housing Director will sign the confined space entry permit indicating that the permit-required confined space is ready for entry

(e.g., all power sources/energy sources will be locked out and tagged out (LOTO), and any hot work permits issued, if required, The Facilities Engineer will contact the Facilities Manager to sign the confined space entry permit and authorize entry into the permit-required confined space. The original copy of the confined space entry permit is to be posted at the permit-required confined space at all times while employees are working in the space. The Facilities Manager retains the duplicate copy of the confined space entry permit (see Section 4.0.)

- 5.5 While work is being performed inside the permit-required confined space, the Facilities/CHP/Law School Housing Engineer will stay in radio contact with the attendant. The attendant will call the Facilities Engineer when the work is complete or in the event of an emergency.
- 5.6 The confined space entry permit will remain valid until either of the conditions in Section 4.3 is encountered.
- 5.7 When the confined space entry permit is no longer valid, the employees involved in the work will return the permit to the Facilities Manager. The original copy of the permit will be matched with the duplicate copy retained by the Facilities Manager and sent to the Environmental Health & Safety Department daily.
- 5.8 When the work is completed and the involved employees have left the permit-required confined space, all systems will be returned to their original condition. The Facilities Manager will check the permit-required confined space and authorize that it be put back into service.

## 6.0 Training

Environmental Health & Safety is responsible for ensuring that University employees are trained, should University employees who may be required to enter permit-required confined spaces, in: 1) the requirements of the Confined Space Entry Program; 2) the use of safety equipment; 3) the proper preparation of a confined space for entry; and 4) emergency procedures.

Facilities and Construction Management has retained an outside vendor to supply this training for their employees. Captured employees:

- FCM: facility managers and engineers
- FCM: residential property managers and superintendents (currently Cooper Square Realty)
- Other University departments: Law Housing

### 6.1 Frequency of Training

- 6.1.1 Training must be conducted before an employee is first assigned duties included in the Confined Space Entry Program.
- 6.1.2 Training must be conducted before an employee is assigned new or additional duties included in the Confined Space Entry Program.
- 6.1.3 Training must be repeated whenever there is a change in the Confined Space Entry Program or a change in the hazards associated with permit-required confined space entry in which employees have not received training.

6.1.4 Training must be repeated whenever there are deviations from the Confined Space Entry Program or detected deficiencies in employees' knowledge or execution of the Confined Space Entry Program.

6.2 Facilities and Construction Management and Law Housing are responsible for identifying employees to be included in the Confined Space Entry Program.

6.3 Facilities Management is responsible for ensuring that employees who are included in the Confined Space Entry Program attend the training provided by Facilities and Construction Management.

6.4 Environmental Health & Safety will maintain records of employee training. The records will include the dates of training, subjects covered, names of employees trained and name and signature of the trainer. Copies of training records will be sent to the Facilities Management Office.

#### Central Heating Plant

6.6 The Director of the Central Heating Plant is responsible for providing training for building employees in: 1) the requirements of the Confined Space Entry Program; 2) the use of safety equipment; 3) the proper preparation of a confined space for entry; and 4) emergency procedures. Facilities and Construction Management will provide Confined Space Entry training for these employees.

6.7 The Environmental Health & Safety Department will assist the Director of the Plant in conducting confined space entry training, particularly in the use of safety equipment, as necessary.

#### 6.8 Frequency of Training

6.8.1 Training must be conducted before an employee is first assigned duties included in the Confined Space Entry Program.

6.8.2 Training must be conducted before an employee is assigned new or additional duties included in the Confined Space Entry Program.

6.8.3 Training must be repeated whenever there is a change in the Confined Space Entry Program or a change in the hazards associated with permit-required confined space entry in which employees have not received training.

6.8.4 Training must be repeated whenever there are deviations from the Confined Space Entry Program or detected deficiencies in employees' knowledge or execution of the Confined Space Entry Program.

6.9 The CHP Manager will maintain records of employee training. The records will include the dates of training, subjects covered, names of employees trained and name and signature of the trainer. Copies of training records will be sent to the Environmental Health & Safety Department.

#### 7.0 Outside Contractors

**Subject: CONFINED SPACE ENTRY**

Policy No. 153

- 7.1 Outside contractors must comply with all of the requirements of the New York University Confined Space Entry Program. The Facilities/CHP/Law School Manager or Director should inform outside contractors of the requirements of the Confined Space Entry Program during the bidding process. Specifically, the outside contractor should provide a copy of their confined space entry program and copy of the workers' certification that they have been trained in confined space entry, the confined space entry permit, required safety equipment and training requirements must be discussed with the outside contractor prior to authorizing entry into a permit-required confined space within a University Facilities.
  - 7.2 The outside contractor supervisor and New York University Facilities/CHP/Law School Housing Manager will jointly complete and sign the confined space entry permit. The outside vendor is responsible for performing and recording the periodic atmospheric monitoring. When the confined space entry permit is no longer valid, the outside contractor supervisor will contact the Facilities Manager. The Facilities Manager will match the original copy of the confined space entry permit with the duplicate copy retained by him or her and send the confined space entry permit to the Environmental Health & Safety Department (see Section 4.2.) on a daily basis.
  - 7.3 The Facilities Manager/CHP Director/Law School Housing Director or designee will debrief the outside contractor of the permit-required confined space entry regarding the procedures followed, any hazards that may be encountered in that specific work area, and what emergency personnel to contact. The Facilities Manager will record the results of the debriefing and submit a copy to the Environmental Health & Safety Department.
- 8.0 Confined Space Entry Program Evaluation
- 8.1 The Environmental Health & Safety Department will conduct a daily evaluation of confined space entry permits. The Environmental Health & Safety Department will conduct an annual evaluation of the Confined Space Entry Program and record the results in a written report.
  - 8.2 The Environmental Health & Safety Department, Facilities and Construction Management and Law School Housing will periodically evaluate confined spaces and entry procedures and modify the procedures as necessary. Periodic evaluations will be documented.

**PART II: SPACE SPECIFIC CONFINED SPACE ENTRY PROCEDURES****II A Petroleum Bulk Storage Tank**

## 1.0 Workplace

1.1 Aboveground Petroleum Bulk Storage Tank (PBST). There are 22 aboveground PBSTs located on the Washington Square Campus. Appendix C lists the locations of aboveground PBSTs on the Washington Square Campus, the type of fuel stored and the tank capacities. Some of the aboveground PBSTs located on the Washington Square Campus are under the control of the Central Plant; however, all employees should be aware of the locations of all University PBSTs in the event that they are required at any time to perform work in or on PBSTs under the control of the Plant. The PBSTs located on the Washington Square Campus are horizontal, cylindrical vessels fabricated from steel. A PBST has a vent pipe and a fill pipe connected to its surface that terminates outside of the Facilities in which the PBST is housed. University employees currently do not enter aboveground PBSTs. Outside contractors are employed to repair any interior tank issues. (Please call EHS to obtain the list from Appendix C)

1.2 Underground Petroleum Bulk Storage Tank (PBST). There are 9 underground PBSTs located on the Washington Square Campus. Appendix C lists the locations of underground PBSTs on the Washington Square Campus, the type of fuel stored and the tank capacities. Some of the underground PBSTs located on the Washington Square Campus are under the control of the Central Plant; however, all employees should be aware of the locations of all University PBSTs in the event that they are required at any time to perform work in or on PBSTs under the control of the Plant. The underground PBSTs are identical in physical configuration to the aboveground PBSTs. Most of the underground PBSTs located on the Washington Square Campus are contained within underground vaults that are accessible through manholes. University employees currently do not enter underground PBSTs. Outside contractors are employed to repair any interior tank issues.

1.3 All petroleum bulk storage tanks shall have appropriate signage: DANGER, CONFINED SPACE, ENTER BY PERMIT ONLY.

## 2.0 Potential Hazards

The recognized hazards associated with PBSTs are the risks that a University employee could be:

- injured due to contact with components of the PBST or the tools being used;
- injured by breathing fumes from fuel residues;
- injured in the eye due to airborne dust if eye protection is not worn;
- engulfed in fuel if inlet and outlet valves are not properly closed and locked out;
- injured by slipping on a wet PBST surface and falling;
- electrically shocked by faulty equipment taken into the PBST;
- burned or overcome by fire or products of combustion caused by the presence of explosive/flammable gases equal to or greater than 10% of the lower flammable limit (LFL); or
- harmed by a concentration of oxygen in the atmosphere equal to or less than 19.5% by volume.

## 3.0 Permits

Confined Space Entry Permit. If at any time a University employee required or permitted to enter a PBST shall have successfully completed, as a minimum, the permit-required confined space

Subject: **CONFINED SPACE ENTRY**

Policy No. 153

entry training as required by the following sections of these procedures. *A written copy of operating and rescue procedures as required by these procedures shall be at the work site for the duration of the job.* The Confined Space Entry Permit must be completed by the Director/Manager before approval can be given to enter a PBST. This permit verifies completion of the items listed below. This permit shall be kept at the job site for the duration of the job. If circumstances cause an interruption in the work or a change in the alarm conditions for which entry was approved, a new Confined Space Entry Permit must be completed.

#### 4.0 Control of Hazards

4.1 Engulfment. Lock out fuel inlet valve. Affix a tag to the lock to inform others that a permit-required confined space entry is in progress. Drain the PBST by either burning off residual fuel (if PBST is nearly empty) or by pumping fuel into a cross-connected PBST. Lock out fuel outlet valve. Affix a tag to the lock to inform others that a permit-required confined space entry is in progress.

#### 4.2 Atmosphere

4.2.1 Testing. The PBST atmosphere shall be tested to determine whether dangerous air contamination and/or an oxygen deficiency exist. Testing shall be performed by the FACILITIES ENGINEER who has successfully completed the gas detector training for the monitor that will be used. The minimum parameters to be monitored are oxygen deficiency and LFL concentration. A written record of the pre-entry test results shall be made and kept at the work site for the duration of the job. The FACILITIES ENGINEER shall certify in writing (on the Confined Space Entry Permit), based upon the results of the pre-entry testing, that all hazards have been eliminated. Affected employees shall be able to review the testing results.

4.2.2 Space Ventilation. Use a portable blower to augment natural ventilation through the PBST vent pipe. Place a flexible duct attached to the portable blower through the PBST manhole to introduce fresh air into the PBST. After a suitable ventilating period, repeat the testing. Entry may not begin until testing has demonstrated that a hazardous atmosphere has been eliminated.

4.3 Fire and Fumes. Carefully prepare the PBST by cleaning surfaces of volatile or combustible coatings within four inches of all mechanical repair operations with a non-flammable, non-toxic cleaner. Maintain the oxygen concentration between 19.5% and 23.5% and the LFL concentration below 10% using the portable blower. Use only non-sparking tools.

4.4 Electrical Shock. Electrical equipment used in the PBST shall be provided with ground fault interruption (GFI).

4.5 Slips and Falls. Residual fuel cannot be suctioned from the floor surface of the PBST. Traction soled footwear shall be worn during entry into a PBST.

4.6 Eye and Skin Injury. Eye protection and gloves shall be worn during entry into a PBST.

#### 5.0 Entry Procedures

5.1 Authorization. Only the FACILITIES MANAGER/DIRECTOR may authorize an employee to enter a PBST. The FACILITIES MANAGER must determine that conditions in the PBST meet permit requirements before authorizing entry. If there are no atmospheric hazards present and if the pre-entry tests show there are no dangerous air

Subject: **CONFINED SPACE ENTRY**

Policy No. 153

contamination and/or oxygen deficiency within the PBST and there is no reason to believe that any is likely to develop, entry into the PBST may proceed. Continuous testing of the atmosphere in the immediate vicinity of the entrants shall be accomplished. The entrants shall immediately leave the PBST when any of the gas monitor alarm set points as defined are reached. No entrants shall return to the PBST until the FACILITIES ENGINEER has used a gas detector to evaluate the situation and has determined that it is safe to re-enter.

- 5.2 Attendant. The FACILITIES MANAGER shall designate an employee to maintain communication with the employees working in the PBST to ensure their safety. The ATTENDANT may not enter the PBST to rescue an entrant or for any other reason, unless authorized by the rescue procedure, and even then, only after calling the rescue team and being relieved as ATTENDANT by another worker.
- 5.3 Communications and Observation. Communications between ATTENDANT and entrant(s) shall be maintained throughout entry. Methods of communication that may be specified by the permit include voice-powered radio, signaling tugs on a rope, and the ATTENDANT'S observations that work activities (such as mechanical repair), which require deliberate operator control, continue normally. Background noise levels in the vicinity of some PBSTs preclude the use of voice or rapping on PBST walls as a method of communication.

## 6.0 Rescue Procedures

Acceptable rescue procedures include the use of public emergency services and procedures for breaching a PBST. The permit specifies which procedures are available, but the FACILITIES/CHP/LAW SCHOOL HOUSING MANAGER makes the final decision based on circumstances. Certain injuries may make it necessary to breach the PBST to remove an entrant rather than risk additional injury by removal through the existing manhole; however, the FACILITIES MANAGER must ensure that no breaching procedure used for rescue would violate terms of the entry permit. For example, if the PBST must be breached by cutting with a torch, the PBST surfaces to be cut must be free of volatile or combustible coatings within four inches of the cutting line and the atmosphere within the PBST must be below the LFL. When dangerous air contamination is attributable to flammable and/or explosive substances, lighting and electrical equipment shall be Class I, Division 1 rated per National Electrical Code and no ignition sources shall be introduced into the PBST.

6.1 Employee Injury. In the event of an employee injury, the ATTENDANT shall contact the FACILITIES ENGINEER via radio and request assistance. The FACILITIES ENGINEER shall immediately contact the FACILITIES MANAGER who shall oversee rescue procedures. The ATTENDANT shall not attempt to enter the PBST to assist an injured employee(s). The ATTENDANT shall only hold the lifeline and attempt to assist the injured employee(s) exit the PBST. If other employees are in the vicinity of the PBST, their assistance shall be requested. If the injured employee(s) is unable to exit the PBST and no other employees are able to assist the ATTENDANT, the FACILITIES MANAGER shall contact the New York City Fire Department and begin breaching procedures as necessary.

6.2 Retrieval Line and Harnesses. The retrieval lines and harnesses generally required under 29 CFR Part 1910.146, the OSHA permit-required confined spaces standard, are usually impractical for use in PBSTs because the internal configuration of the PBST prevents rescuers from hauling out injured entrants; however, unless the rescue procedure calls for breaching the PBST for rescue, the rescue team shall be trained in the use of retrieval lines and harnesses for removing injured entrants through the PBST manhole.

**II B Underground Vault and Crawlspace**

## 1.0 Workplaces

1.1 Underground Vault. There is an underground vault located beneath the sidewalk in front of Washington Square Village. The underground vault houses high temperature hot water (HTHW) lines. Central Plant employees routinely enter the underground vault through a rectangular manhole to weld leaking HTHW lines. It is unlikely that non-Plant employees will be required to enter the vault; however, all employees should be aware that the vault is a permit-required confined space. (See Attachment D for complete list which can be obtained by calling EHS at 81450). A confined space warning sign should be posted at the entrance to these areas.

1.3 Crawlspace. There are identified crawlspaces on the Washington Square Campus - see Appendix D. Some of the crawlspaces located on the Washington Square Campus are under the control of the Central Plant; however, all employees should be aware of the locations of all identified crawlspaces in the event that they are required at any time to perform work in crawlspaces under the control of the Plant. Additionally, all employees should be aware of the potential existence of other crawlspaces located on the Washington Square Campus. Crawlspaces typically house steam or high temperature hot water (HTHW) lines. University employees sometimes enter a crawlspace through a constricted opening to weld leaking lines. (See Attachment D for complete list). A confined space warning sign should be posted at the entrance to these areas.

## 2.0 Potential Hazards

The recognized hazards associated with the underground vault and crawlspaces are the risks that a University employee could be:

- Injured by the tools being used;
- Injured in the eye due to airborne dust if eye protection is not worn;
- Engulfed in high temperature hot water if inlet and outlet valves are not properly closed and locked out;
- Burned by high temperature hot water or steam, or by contact with hot metal surfaces, such as the steam or HTHW lines;
- Overcome by heat stress caused by a warm atmosphere inside the vault or crawlspace;
- Injured by slipping on a wet vault or crawlspace surface and falling;
- Electrically shocked by faulty equipment taken into the vault or crawlspace;
- Overcome by fumes generated by welding.

## 3.0 Permits

Permits are not required at this time for spaces referred to in Section II B. However, should conditions change where a space is rendered a permit-required confined space, the following procedures will be followed:

Confined Space Entry Permit. Any University employee required or permitted to enter a vault or crawlspace shall have successfully completed, as a minimum, the permit-required confined space entry training as required by the following sections of these procedures. A written copy of operating and rescue procedures as required by these procedures shall be at the work site for the duration of the job. The Confined Space Entry permit must be completed before approval can be

given to enter a vault or crawlspace. This permit verifies completion of the items listed below. This permit shall be kept at the job site for the duration of the job. If circumstances cause an interruption in the work or a change in the alarm conditions for which entry was approved, a new Confined Space Entry Permit must be completed.

#### 4.0 Control of Hazards

4.1 Engulfment. Lock out steam and/or high temperature hot water (HTHW) valves. Affix a tag to the lock(s) to inform others that a permit-required confined space entry is in progress. Drain water remaining in the section of line to be repaired and/or bleed trapped steam.

4.2 Burns and heat stress. Vent the vault or crawlspace by opening the manhole or door. If faster cooling is needed, use a portable blower to increase ventilation. Check air temperatures in the vault or crawlspace to assure they are within acceptable limits before entering.

#### 4.3 Atmosphere

4.3.1 Testing. If necessary, the vault or crawlspace atmosphere shall be tested to determine whether dangerous air contamination and/or an oxygen deficiency exist. Testing shall be performed by the FACILITIES/CHP/LAW SCHOOL HOUSING ENGINEER who has successfully completed the gas detector training for the monitor he will use. The minimum parameters to be monitored are oxygen deficiency and LFL concentration. A written record of the pre-entry test results shall be made and kept at the work site for the duration of the job. The FACILITIES ENGINEER shall certify in writing (on the Confined Space Entry Permit), based upon the results of the pre-entry testing, that all hazards have been eliminated. Affected employees shall be able to review the testing results.

4.3.2 Space Ventilation. Use portable blowers with flexible ductwork to augment natural circulation if needed. After a suitable ventilating period, repeat the testing. Entry may not begin until testing has demonstrated that a hazardous atmosphere has been eliminated.

4.4 Fire and Fumes. Carefully prepare the HTHW or steam line by cleaning surfaces of volatile or combustible coatings within four inches of all welding or torch cutting operations with a non-flammable, non-toxic cleaner. Maintain the oxygen concentration between 19.5% and 23.5% and the LFL concentration below 10% using the portable blower, as necessary. All welding and cutting operations shall be done in accordance with the requirements of 29 CFR Part 1910, Subpart Q, the Occupational Safety and Health Administration (OSHA) welding standard. Welding gas tanks shall never be brought into a vault or crawlspace.

4.5 Electrical Shock. Electrical equipment used in the vault or crawlspace shall be provided with ground fault interruption (GFI).

4.6 Slips and Falls. Remove residual water before entering the vault or crawlspace.

4.7 Eye and Skin Injury. Eye protection and gloves shall be worn during entry into the vault or crawlspace.

#### 5.0 Entry Procedures

Subject: **CONFINED SPACE ENTRY**

Policy No. 153

- 5.1 Authorization. Only the FACILITIES/CHP/LAW SCHOOL HOUSING MANAGER may authorize an employee to enter an underground vault or crawlspace. The FACILITIES/CHP/LAW SCHOOL HOUSING MANAGER must determine that conditions in the vault or crawlspace meet permit requirements before authorizing entry. If there are no atmospheric hazards present and if the pre-entry tests show there are no dangerous air contamination and/or oxygen deficiency within the vault or crawlspace and there is no reason to believe that any is likely to develop, entry into the vault or crawlspace may proceed. Continuous testing of the atmosphere in the immediate vicinity of the entrants shall be accomplished. The entrants shall immediately leave the vault or crawlspace when any of the gas monitor alarm set points as defined are reached. No entrants shall return to the vault or crawlspace until the FACILITIES ENGINEER has used a gas detector to evaluate the situation and has determined that it is safe to re-enter.
- 5.2 Attendant. The FACILITIES/CHP/LAW SCHOOL HOUSING MANAGER shall designate an employee to maintain communication with employees working in the vault or crawlspace to ensure their safety. The ATTENDANT may not enter the vault or crawlspace to rescue an entrant or for any other reason, unless authorized by the rescue procedure, and even then, only after calling the rescue team and being relieved as ATTENDANT by another worker.
- 5.3 Communications and Observation. Communications between ATTENDANT and entrant(s) shall be maintained throughout entry. Methods of communication that may be specified by the permit include voice-powered radio, signaling tugs on a rope, and the ATTENDANT'S observation that work activities (such as welding), which require deliberate operator control, continue normally.

## 6.0 Rescue Procedures

Acceptable rescue procedures include the use of public emergency services and procedures for breaching the vault or crawlspace wall. The permit specifies which procedures are available, but the FACILITIES/CHP/LAW SCHOOL HOUSING MANAGER makes the final decision based on circumstances. Certain injuries may make it necessary to breach the vault or crawlspace wall to remove an entrant rather than risk additional injury by removal through the existing manhole or door; however, the FACILITIES MANAGER must ensure that no breaching procedure used for rescue would violate terms of the entry permit. For example, if the vault or crawlspace must be breached by cutting with a torch, the vault or crawlspace surfaces to be cut must be free of volatile or combustible coatings within four inches of the cutting line and the atmosphere within the vault or crawlspace must be below the LFL. When dangerous air contamination is attributable to flammable and/or explosive substances, lighting and electrical equipment shall be Class I, Division 1 rated per National Electrical Code and no ignition sources shall be introduced into the vault or crawlspace.

- 6.1 Employee Injury. In the event of an employee injury, the ATTENDANT shall contact the FACILITIES ENGINEER via radio and request assistance. The FACILITIES ENGINEER shall immediately contact the FACILITIES MANAGER who shall oversee rescue procedures. The ATTENDANT shall not attempt to enter the vault or crawlspace to assist an injured employee(s). The ATTENDANT shall only hold the lifeline and attempt to assist the injured employee(s) exit the vault or crawlspace. If other employees are in the vicinity of the vault or crawlspace, their assistance shall be requested. If the injured employee(s) is unable to exit the vault or crawlspace and no other employees are able to assist the ATTENDANT, the FACILITIES MANAGER shall contact the New York City Fire Department and begin breaching procedures as necessary.

Subject: **CONFINED SPACE ENTRY**

Policy No. 153

6.3 Retrieval Line and Harnesses. The retrieval lines and harnesses generally required under 29 CFR Part 1910.146, the OSHA permit-required confined spaces standard, are usually impractical for use in vaults and crawlspaces because the internal configuration of the vault or crawlspace prevents rescuers from hauling out injured entrants; however, unless the rescue procedure calls for breaching the vault or crawlspace wall for rescue, the rescue team shall be trained in the use of retrieval lines and harnesses for removing injured entrants through the vault manhole or crawlspace door.

### **II C: Steam Generator**

University employees shall not enter steam generators under any circumstances. Steam generators are equipped with warning signs that read, "DANGER, PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER."

### **II D: Abandoned Coal Chute**

University employees shall not enter the abandoned coal chute in the Basement of 4 Washington Square North. The coal chute is equipped with a warning sign that reads, "DANGER, CONFINED SPACE, DO NOT ENTER." Employees should be aware of the potential existence of other abandoned coal chutes on the Washington Square Campus.

### **II E: Sump Pit**

#### 1.0 Workplace

There are six sump pits that have been identified on the Washington Square Campus (Bobst Library A-Level (east side), 240 Mercer Street Basement (rain water and waste), 110 West Third Street Basement (rain water and waste), University Hall, Palladium and Kimmel Hall). The sump pits located on the Washington Square and Downtown Campuses are vertical excavations lined with poured concrete. Sump pits vary in depth (but are usually no deeper than 10 feet) and are equipped with ejector pumps to discharge the effluent. The sump pits located in the basements of 240 Mercer Street and 110 West Third Street are equipped with covers. University employees infrequently reach their hands into sump pits to retrieve the strainer baskets or floats. Outside contractors are employed for any repairs and shall follow NYU's Policy on Confined Space entry.

#### 2.0 Potential Hazards

The recognized hazards associated with sump pits are the risks that a University employee could be:

- Injured by breathing hydrogen sulfide fumes from a sewer stoppage;
- Harmed by a concentration of oxygen in the atmosphere equal to or less than 19.5% by volume;
- Burned or overcome by fire or products of combustion caused by the presence of explosive/flammable gases equal to or greater than 10% of the lower flammable limit (LFL);
- Engulfed in waste water if inlet and outlet valves are not properly closed and locked out;
- Injured by slipping on a wet sump pit surface and falling;
- Injured due to contact with components of the sump pit or the tools being used;
- Electrically shocked by a faulty ejector pump or faulty equipment taken into the sump pit; or

- Injured to the eye due to airborne dust if eye protection is not worn.

### 3.0 Permits

Confined Space Entry Permit. Presently, University employees do not enter sump pits. However, if any University employee is required to enter into a sump pit, that employee shall have successfully completed, as a minimum, the permit-required confined space entry training as required by the following sections of these procedures *A written copy of operating and rescue procedures as required by these procedures shall be at the work site for the duration of the job.* The Confined Space Entry Permit must be completed before approval can be given to enter a sump pit. This permit verifies completion of the items listed below. This permit shall be kept at the job site for the duration of the job. If circumstances cause an interruption in the work or a change in the alarm conditions for which entry was approved, a new Confined Space Entry Permit must be completed.

### 4.0 Control of Hazards

4.1 Engulfment. Lock out the wastewater inlet valve(s). Affix tags to the locks to inform others that a permit-required confined space entry is in progress. Drain the sump pit by using the ejector pump or a submersible pump (if the ejector pump is not operative). Lock out the wastewater outlet valve. Affix a tag to the lock to inform others that a permit-required confined space entry is in progress.

#### 4.2 Atmosphere

4.2.1 Testing. The sump pit atmosphere shall be tested to determine whether dangerous air contamination and/or an oxygen deficiency exist. Testing shall be performed by the FACILITIES ENGINEER who has successfully completed the gas detector training for the monitor he will use. The minimum parameters to be monitored are oxygen deficiency and hydrogen sulfide and LFL concentrations. A written record of the pre-entry test results shall be made and kept at the work site for the duration of the job. The FACILITIES ENGINEER shall certify in writing (on the Confined Space Entry Permit), based upon the results of the pre-entry testing, that all hazards have been eliminated. Affected employees shall be able to review the testing results.

4.2.2 Space Ventilation. Use a portable blower to augment natural ventilation. Place a flexible duct attached to the portable blower into the sump pit to introduce fresh air into the sump pit. After a suitable ventilating period, repeat the testing. Entry may not begin until testing has demonstrated that a hazardous atmosphere has been eliminated.

4.3 Fire and Fumes. Maintain the oxygen concentration between 19.5% and 23.5% and the LFL concentration below 10% using the portable blower. Use only non-sparking tools. Clean sump pit components using only a non-flammable, non-toxic cleaner.

4.4 Electrical Shock. Lock out the ejector pump. Affix a tag to the lock to inform others that a permit-required confined space entry is in progress. Electrical equipment used in the sump pit shall be provided with ground fault interruption (GFI).

4.5 Slips and Falls. Suction residual wastewater from the floor surface of the sump pit. Traction soled footwear shall be worn during entry into a sump pit.

4.6 Eye and Skin Injury. Eye protection and gloves shall be worn during entry into a sump pit.

## 5.0 Entry Procedures

- 5.1 Authorization. Only the FACILITIES MANAGER may authorize an employee to enter a sump pit. The FACILITIES MANAGER must determine that conditions in the sump pit meet permit requirements before authorizing entry. If there are no atmospheric hazards present and if the pre-entry tests show there are no dangerous air contamination and/or oxygen deficiency within the sump pit and there is no reason to believe that any is likely to develop, entry into the sump pit may proceed. Continuous testing of the atmosphere in the immediate vicinity of the entrants shall be accomplished. The entrants shall immediately leave the sump pit when any of the gas monitor alarm set points as defined are reached. No entrants shall return to the sump pit until the FACILITIES ENGINEER has used a gas detector to evaluate the situation and has determined that it is safe to re-enter.
- 5.2 Attendant. The FACILITIES MANAGER shall designate an employee to maintain communication with the employees working in the sump pit to ensure their safety. The ATTENDANT may not enter the sump pit to rescue an entrant or for any other reason, unless authorized by the rescue procedure, and even then, only after calling the rescue team and being relieved as ATTENDANT by another worker.
- 5.2 Communications and Observation. Communications between ATTENDANT and entrant(s) shall be maintained throughout entry. Methods of communication that may be specified by the permit include voice-powered radio, signaling tugs on a rope, and the ATTENDANT'S observations that work activities (such as mechanical repair), which require deliberate operator control, continue normally.

## 6.0 Rescue Procedures

Acceptable rescue procedures include the use of rescue equipment and public emergency services. The permit specifies which procedures are available, but the FACILITIES MANAGER makes the final decision based on circumstances. When dangerous air contamination is attributable to flammable and/or explosive substances, lighting and electrical equipment shall be Class I, Division 1 rated per National Electrical Code and no ignition sources shall be introduced into the sump pit.

- 6.1 Retrieval Line and Harnesses. Each authorized entrant into a sump pit shall use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head. The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the sump pit in such a manner that rescue can begin as soon as the ATTENDANT becomes aware that rescue is necessary. A mechanical device shall be available to retrieve personnel from a sump pit more than five feet deep.
- 6.2 Employee Injury. In the event of an employee injury, the ATTENDANT shall contact the FACILITIES ENGINEER via radio and request assistance. The FACILITIES ENGINEER shall immediately contact the FACILITIES MANAGER who shall oversee rescue procedures. The ATTENDANT shall not attempt to enter the sump pit to assist an injured employee(s). The ATTENDANT shall only hold the lifeline and attempt to assist the injured employee(s) exit the sump pit. If other employees are in the vicinity of the sump pit, their assistance shall be requested. If the injured employee(s) is unable to exit the sump pit and no other employees are able to assist the ATTENDANT, the FACILITIES MANAGER shall contact the New York City Fire Department.