

Efficient Home, LLC Confined Space Policy

Last Revised October 27, 2015

1. Introduction and Purpose of Document

This document is intended to detail the policies and procedures necessary for Efficient Home, LLC (EH) compliance with the Occupational Safety and Health Administration's regulations regarding work in confined spaces, 29 CFR 1926 Subpart AA, which became effective on August 3, 2015.

2. Definitions

- a. Attendant - means an individual stationed outside one or more permit spaces who assesses the status of authorized entrants and who must perform the duties specified in
- b. Competent Person - means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.
- c. Confined Space – A confined space means a space that:
 - i. Is large enough and so configured that an employee can bodily enter it;
 - ii. Has limited or restricted means for entry and exit; and
 - iii. Is not designed for continuous employee occupancy.
- d. Entry Supervisor - means the qualified person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required.
- e. Non-entry rescue - occurs when a rescue service, usually the attendant, retrieves employees in a permit space without entering the permit space.
- f. Permit Required Confined Space (or Permit Space) means a confined space that has one or more of the following characteristics:
 - i. Contains or has a potential to contain a hazardous atmosphere;
 - ii. Contains a material that has the potential for engulfing an entrant;
 - iii. 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; or
 - iv. Contains any other recognized serious safety or health hazard.

3. Employee Training

This document will also serve as the training material for all employees who are to interact in any way with a Confined Space as a part of their required duties. A Training Certification document will be completed by the Trainer(s) for the employees trained (Appendix B).

4. Typical Applicable Spaces

While not necessarily limited to the following types of spaces, EH and/or its subcontractors typically perform work in the following spaces that would be considered "Confined" or "Permit-Required Confined" spaces:

- a. Crawl Spaces, Including Beneath Mobile Homes – These will typically be considered Permit Required Confined Spaces, due to the possibility of sewer gas, live uninsulated electrical wires, and other potential safety hazards.
- b. Attics – These will typically be considered Permit Required Confined Spaces if there is no solid attic floor and the workers must remain on the joists to prevent falling through the ceiling.

Typical work to be performed within confined spaces includes (but is not limited to):

- a. Insulation
- b. Air Sealing
- c. Electrical Installation or Repair
- d. HVAC Equipment Installation or Repair
- e. Plumbing Installation or Repair

Most of the Confined Spaces in which work is to be performed by EH or its subcontractors will be Permit-Required Confined Spaces, and therefore a permit will be issued for each job and each Confined Space that requires entry.

5. Procedures for Assigning Work In Confined Spaces to Subcontractors

- a. **Independent Visitor Subcontractor** – an “Independent Visitor” subcontractor is one who schedules the work to be done directly with the customer. EH is not necessarily aware of when that work will take place. In these instances, the subcontractor will be responsible for ensuring their compliance with the confined space rules.
 - i. A notice detailing the confined space compliance requirements will appear on all work orders from Efficient Home to the subcontractor.
 - ii. The subcontractor will provide documentation of the responsible person’s determination of the space to be unconfined, confined or permit-required confined and the steps taken to ensure compliance with the rules. An example of when a space may be deemed as unconfined might be an attic with pulldown stairs and a plywood subfloor within the bounds of the work area. Attic HVAC unit repair or maintenance may be able to be performed without leaving the floored area.
 - iii. This documentation will be stored in the customer’s folder on the company server.
- b. **Subcontractors with EH Supervision** – Subcontractors whose work is typically overseen by EH employees include Insulators and Air Sealers. The installation is scheduled in coordination with EH, and an EH employee is assigned as the Installation Manager and is at the job site on the day of the installation. The Installation Manager act as the site’s Competent Person and will determine the type of space(s) that the subcontractor will perform work in by using the EH Confined Space Checklist (Appendix A).
 - i. Virtually all attic and crawl space areas will qualify as either a confined space or a permit required confined space.
 - ii. The Installation Manager shall email him/herself a Confined Spaces Permit document for each Confined Space, to be completed on the job site on the day the work is performed.
 - iii. The Installation Manager shall post warning signs at the entrance to all confined spaces.
 - iv. All attic and crawl space areas to be entered must have an air quality measurement performed.
 - v. The Installation Manager may act as the Attendant while the subcontractor is performing the work in the Confined Space.
 - vi. Given the fact that both attics and crawl spaces have many obstructions, barriers and other fixed items that could entangle non-entry rescue equipment, EH has determined that non-entry rescue equipment is not advised under 1926.1211(c) and shall not be required.

6. Procedures for Assigning Work In Confined Spaces to Employees

- a. **Energy Audits, including full energy audits and Quick Home Energy Checkups**
 - i. The customer will be informed that in order for a full inspection of the confined space to occur, they must provide a person who is qualified to act as an Attendant. Communications must be possible between the entrant and the Attendant at all times. This may be accomplished via hand-held two way radios, or the Attendant stationed immediately outside the Confined Space.
 - ii. The Auditor may act as the Entry Supervisor and inspect the Confined Space, provided that:
 1. An Attendant is present outside the Confined Space or otherwise in two-way communication with the Auditor.
 2. The air quality has been determined to be non-hazardous.
 3. The Auditor has placed a warning sign at the entrance to the confined space.
 - iii. If the customer is unable/unwilling to act as the Attendant, then inspection of the confines space shall be limited to examination from the entrance. In this instance, no Attendant or sign shall be required.

APPENDIX A

Efficient Home, LLC Confined Space Checklist (required for each confined space)

Work Date:			
Customer Name:			
Work Site Address:			
Entry Supervisor Name:		Signature:	
Space Description:			

Determination of Confined Space (must meet all three)

The space large enough and configured that a person can bodily enter it	
The space has limited or restricted means for entry and exit	
The space is not designed for continuous occupancy	

**If this is a confined space as determined above,
Determination of Permit-Required Confined Space (must meet at least one of the following):**

The space contains or has a potential to contain a hazardous atmosphere	
The space contains a material that has the potential for engulfing an entrant	
The space 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	
The space contains any other recognized serious safety or health hazard	

Based on the checklists above, this space is:

A non-confined space	
A confined space	
A permit-required confined space (continue checklist, fill out and sign permit below)	

Efficient Home, LLC Permit For Entering Confined Space

Permit-Required Confined Hazardous Conditions Checklist

Existing or potential atmospheric hazards. If so, air quality must be monitored for the duration of occupancy	
Fall Hazard (unfloored attic)	
Exposed Live Electrical Wiring	
Any other recognized serious safety or health hazards (describe below)	

Rescue and Emergency Services shall be provided by the 911 service. Rescue availability confirmed _____

No air testing is required for this space _____ Air quality monitored during occupancy _____

Purpose of entry: _____

Authorized from (time): _____ To: _____

Authorized entrants: _____

All entrants have been briefed on the existing or potential hazards within the Confined Space _____

Person(s) serving as attendant(s): _____

Equipment to be used by entrant(s): (Tyvek suit, respirator, etc.): _____

Additional information: _____

Entry Supervisor Name: _____

Signature: _____

Date: _____

