



SAMPLE WRITTEN GENERAL INUSTRY CONFINED SPACE PROGRAM

For Compliance with:

**Department of Labor, Occupational Health and Safety Administration
(OSHA): Confined Space Regulations for General Industry 29 CFR 1910.146.**

NOTE: This material was compiled by the National Pest Management Association (NPMA) as a sample plan to guide and assist in complying with OSHA's federal rules and regulations. It is not intended to supersede the requirements detailed in federal or state regulations. Employers should review the standards for particular requirements which are applicable to their specific situation and state. Employers will need to add information relevant to their particular company in order to develop an effective program. NPMA can assist in completing and maintaining this plan but recommend contacting your local OSHA office for final authority.

Sample Confined Space Program Structural Pest Management Industry

I. Purpose

The purpose of **(insert company name)**'s confined space program is to detail procedures to ensure safe entry into confined spaces by our employees. This document contains requirements for practices and procedures to protect our employees from potential hazards and train our employees to properly assess and safely manage potential hazards in confined spaces.

The standards detailed in **(insert company name)**'s confined space program are derived directly from the Department of Labor Occupational Health and Safety Administration (OSHA), Confined Space regulations for General Industry 29 CFR 1910.146. **(insert company name)** is in the business of structural pest management services and therefore fall within the scope of OSHA's general industry standards. It is **(insert company name)** policy that all provisions of this program are strictly implemented and adhered to by all **(insert company name)** employees

II. Program Administrator

(insert name/position) shall be responsible for the implementation, training and monitoring of this program. Specifically the program administrator shall:

- a. Train all employees that may enter a confined space
- b. Document all training of employees
- c. Maintain a written copy of this program (**provide location**) and make available, upon request, to employees, their designated representatives, and officials with the federal and **(insert state)** OSHA.
- d. Annually review this program and update if necessary. Specifically review list of *Pest Management Confined Space Potential Hazards/Protective Measures* (appendix A)
- e. Provide annual training to existing employees of new potential hazards and/or procedures of this program
- f. Continuously monitor employee activity and ensure this confined space plan is being properly followed.

III. Steps of an Effective Confined Space Entry Program

Employees of **(insert company)** shall not enter a confined space until the following requirements are met:

- a. Employees that may encounter and/or enter a confined space are trained on entry procedures and made aware of possible hazards that may be encountered in the performance of their job
- b. Employees identify potential hazards prior to entry into confined space
- c. Proper personal protective equipment is provided and worn prior to entry into confined space
- d. Proper tools and equipment are provided and used prior to entry into confined space
- e. Workers enter confined space and continuously monitor for hazards
- f. Workers that identify a permit required hazard which cannot be controlled and prevents safe entry must report this finding to **(insert supervisor)** and shall not enter the confined space without an attendant
- g. Workers implement the permit required confined space program in order to enter the confined space.

IV. Training

All employees who will enter confined spaces shall be trained in entry procedures and identification and evaluation of confined space hazards.

- a) Explanation of confined spaces
- b) Discussion of routine confined spaces encountered in the pest management industry
- c) Discussion of how to treat specific hazards encountered in the pest management industry
- d) Discussion of the protective equipment and tools used, and how to properly maintain and ensure proper function
- e) In depth conversation of what conditions prohibit entry into a confined space and would require a permit
- f) Procedures for responding to an emergency

V. What is a Confined Space?

OSHA defines a confined space as:

- (1) Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- (2) 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 entry); and
- (3) Is not designed for continuous employee occupancy

For pest management services the most common confined spaces may include crawl spaces and attics. Other confined spaces may exist and must be evaluated on a case-by-case basis. It is important to identify confined spaces prior to entry and evaluate hazards. Confined spaces that do not have any hazards do not require additional safety precautions, other than remaining aware of one's surroundings while continuously monitoring for potential hazards.

VI. Hazardous Conditions in Confined Spaces, Entry Procedures and Guidance

- a. Pest Management Hazards in Confined Spaces** - In the pest management industry many of the confined spaces that are entered have potential hazards, but the vast majority can be mitigated and safely avoided with proper preparation, awareness, caution, tools and equipment. Please refer to Appendix A for a list of commonly encountered hazards and measures to adequately protect against. This list should be continuously updated and improved when necessary. Hazards listed in Appendix A are considered non-permit confined space entry hazards.

****In addition to procedures listed in Appendix A all employees entering a non-permit confined space shall have access to a communication device (cellphone, tablet, two-way radio, etc.) that has the capability to contact (insert company name) and/or local emergency services.**

The nature of the pest management industry involves potentially visiting dozens of different work sites daily and it is imperative that employees continuously update and train for potential hazards that can safely be accounted for and avoided.

b. Hazardous Atmosphere in Confined Spaces – OSHA defines a hazardous atmosphere as, an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, injury or acute illness from one or more of the following causes:

- i. Flammable gas, vapor or mist in excess of 10 percent of its lower flammable limit (LFL);
- ii. Airborne combustible dust at a concentration that meets or exceeds its LFL
- iii. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;

- iv. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in subpart G, Occupational Health and Environmental Control, or in Subpart Z, Toxic and Hazardous Substances, of this Part and which could result in employee exposure in excess of its dose or permissible exposure limit;
- v. Any other atmospheric condition that is immediately dangerous to life or health

The majority of services performed by pest management professionals do not involve hazardous atmospheric conditions. Entry into a confined space that has a hazardous atmospheric can be controlled by:

- a. Continuous forced air ventilation to control the hazardous condition
- b. Monitoring and inspection data that supports entry

c. Permit Required Confined Space - In certain instances hazards in confined spaces are of a degree of severity that additional steps are required to ensure safe entry into a confined space. OSHA defines a permit-required confined space as a space that has one or more of the following characteristics:

- (1.) Contains or has the 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 which slopes downward and tapers to a smaller cross-section; or
- (4.) Contains any other recognized serious safety or health hazard.

Employees that complete training on confined spaces are considered a responsible person capable of using their judgment to determine if a confined space has hazards that would require permit-confined space procedures. If an employee determines the confined space is a permit confined space they shall:

- i. Refrain from entry into the confined space, or if already in than immediately exit
- ii. Notify potential entrants of the potential hazard within the confined space



- iii. Immediately contact (**insert name/position of the Program Administrator**) and detail hazardous conditions determined and/or encountered.

VII. Permit-Required Program

The following procedures should be followed when a confined space is determined to be permit-required:

- a. Program administrator determination that the space requires a permit
- b. Identify significant hazards and determine necessary protective steps
- c. Provide protective equipment and tools to ensure safe entry into the confined space
- d. Identify roles of entry team and provide information concerning the tasks to be completed and hazards to be aware of with both the entrant and attendant.
- e. Attendant shall remain at the entry-way of the confined space and should observe and remain in constant communication with the entrant
- f. Determination of the nearest emergency rescues services should be identified, their contact information shall be made available to the attendant and the rescue services availability will be confirmed.

Hazards	Hazardous Conditions	Safety Precautions
Pests	There are an array of pests that PMPs are tasked with handling, in a confined space it is important you understand the potential hazards of both target and non-target pest you may encounter.	<ul style="list-style-type: none"> • Inspect crawlspace prior to entry for pests • Understand and be able to identify pests indigenous to your area and be aware of their potential dangers • Do not approach a potentially dangerous pest without wearing the proper personal protective equipment (gloves, eye protection, etc.) • Keep a first aid kit with necessary supplies on the service vehicle • Report bites, scratches and/or stings caused by a pest to your supervisor
Electrical Hazards	Loose, fallen, exposed or severed electrical wires in crawlspaces can be hazardous and expose you to electrical shocks.	<ul style="list-style-type: none"> • Inspect crawlspace prior to entry and inspect space for electric hazards • Always use double insulated power and hand tools • Do not operate electrical equipment if positioned in standing water • Never repair electrical cords or equipment unless qualified and authorized • Always use caution when working near electricity
Fall Protection	Attics are the predominant area where PMPs may encounter falling hazards in confined spaces	<ul style="list-style-type: none"> • Inspect crawlspace prior to entry and inspect potential fall hazards that could cause you to fall • Walk along ceiling joists and if possible lay a panel across joists for easier movement • Inspect ladder access to the attic if necessary, always comply with procedures detailed in your Company's ladder safety program • Always comply with procedures detailed in your Company's fall protection program
Mold/Fungus/Asbestos	Molds, Fungus and Asbestos when touched, handled or disturbed may cause minor to severe health problems.	<ul style="list-style-type: none"> • Inspect crawlspace prior to entry and attempt to identify mold/fungus or asbestos within the crawlspace • Wear proper protective equipment (eye protection, gloves, proper clothing and respirator) • For asbestos specifically avoid disturbing • Thoroughly wash hands and personal protective equipment upon completion
Temperature	Heat stress can be dangerous in confined spaces if not identified and/or overlooked.	<ul style="list-style-type: none"> • Stop any activity that is making you feel dizzy or overheated • Take frequent breaks and exit the confined space • Drink plenty of water and remain hydrated prior to and after working in a confined space
Exposed Nails/Sharp Materials	Nails or other sharp materials may be protruding through the ground or ceiling. Nails or other sharp materials may be in debris found on the ground	<ul style="list-style-type: none"> • Inspect crawlspace prior to entry to identify protruding nails or other sharp objects • Where personal protective equipment including (proper shoes, gloves and a helmet) • Keep a first aid kit with necessary supplies on the service vehicle