

The School District of Philadelphia Procedures for

Confined Space Entry



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I. POLICY

The purpose of this program is to protect employees at The School District of Philadelphia from the hazards of entry into a confined space and to ensure the safety of employees working around and in permit required confined spaces (PRCS). In addition, this program is intended to assist The School District of Philadelphia in complying with OSHA 29 CFR 1910.146, and other local standards.

This program shall apply to all SDP employees and to contractors during entry into confined spaces and/or potential confined spaces. These mandatory procedures prescribe the minimum criteria for preventing employee exposures to hazardous conditions when entering and working within a confined space. Additional requirements may be designated for confined space entry by the District Safety Officer prior to permitting entry.

II. DEFINITIONS

Confined Space: - A space has all of the following characteristics:

- 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;
- 3. Is not designed for continuous employee occupancy;

<u>Confined Space Entry Permit</u>: - A document that authorizes entry and work in a confined space, which states the type of work, air test results, entry requirements, and protective measures. This document is signed by an Entry Supervisor and is required to be posted at the entrance of the space during such work.

<u>Contaminant</u>: - Any organic or inorganic substance, dust, fume, mist, vapor, or gas, the presence of which in air can be harmful or hazardous to human beings.

Emergency: - Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.

<u>Engulfment</u>: - The surrounding, capturing, or both, of a person by a finely divided particulate matter or liquid that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.



Entry: - Ingress by persons into a permit required confined space which occurs upon breaking the plane of the confined space portal with any part of the entrant's body; and all periods of time in which the confined space is occupied.

Entry Supervisor: - The person 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.

<u>Hazardous Atmosphere</u>: - Hazardous atmosphere poses risk of death, incapacitation, and impairment of self-rescue ability, injury or illness from:

- 1. Flammable gas, vapor, or mist >10% LEL
- 2. Combustible dusts exceeding its LEL (obscures vision at distance of 5 feet)
- 3. Oxygen below 19.5% or above 23.5%
- 4. Chemical/physical hazards exceeding Permissible Exposure Limits
- 5. IDLH (Immediately Dangerous to Life or Health) atmospheres

<u>Hoisting Device</u>: - A person-rated hoist, winch, or similar mechanical device of specific design to permit an employee to safely enter and/or be removed through a top-opening of a confined space.

<u>Hot Work</u>: - Work involving welding, burning, open flame, sparks or temperatures that could ignite combustible materials.

<u>Hot Work Permit:</u> - A written authorization issued for hot work operations.

<u>Immediately Dangerous to Life or Health (IDLH)</u>: - Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space. Values established by NIOSH.

<u>Inerting</u>: - Displacing an atmosphere with a non-reactive gas (e.g., nitrogen or carbon dioxide) so that the resulting atmosphere is noncombustible.



III. CLASSIFICATION

- 1. Has limited or restricted means for entry or exit
- 1. <u>Confined</u> <u>Spaces</u> are

enclosed areas or containers that employees may be required to enter to perform work. Common examples of these areas are fuel storages tanks, furnaces, manholes, pits, tunnels, etc. Confined Spaces can be identified if it meets the following criteria:

- A) Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- B) (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.
- 2. <u>Permit-Required Confined Space (PRCS)</u>: Ensures the safe entry into and work within a confined space for an authorized employee by requiring a physical permit for entry. These areas are spaces that meets all the requirements of a confined space AND that potentially has ANY one or more of the following characteristics:
 - A) Contains or has a potential to contain a hazardous atmosphere
 - B) Contains a material with the potential for engulfment of an entrant
 - C) Has internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or a floor which slopes downward and tapers to a smaller cross-section
 - D) Contains any other recognized serious safety or health hazard
- Non Permit Required Confined Space (NPRCS): Are those that don't present any of the above mentioned hazards that could cause death or serious harm.

IV. PROCEDURES

1. Verify if the space is a confined space.



Examples of Confined Space areas identified throughout the District include but are not limited to the following:

- Boilers
- Tanks
- Air Handling systems and equipment
- Crawl Spaces

- Catch basins
- Elevator pits
- Any Vault, pit or area requiring access through a manhole cover
- ➤ If access is any more difficult than walking through an ordinary door or walking up an ordinary flight of stairs, it is to be considered limited.

Each facility shall list all areas identified as Confined spaces in Appendix C.

2. Determine the type of confined space it is.

- Permit required confined spaces are confined spaces that are hazardous to enter unless special precautions are taken. A PRCS Can be determined if it meets the criteria described in Section III.
- Non-permit required confined spaces are those that don't present any of the PRCS hazards that could cause death or serious harm.

3. Confined Space Labeling and Site Security

Signs or labels identifying each space as either "non-permit required" or "permit required" per the assessment above shall be permanently affixed outside of each opening leading to the space. Sign wording shall comply with OSHA 1910.146(c)(2). Additionally, each entry port or access to a confined space shall be secured such as to prevent unauthorized access.

4. <u>Confined Space Entry Procedures</u> {this section may be modified to apply to contractors only if the district has elected not to perform PRCS or NPRCS entries in house}

Non-Permit Confined Space (NPRCS) Entry Procedure

The following requirements and procedures apply to entry into a designated NPRCS <u>or</u> a PRCS declassified to a NPRCS that meet the conditions as defined within this program:

- Any conditions making it unsafe to remove an entrance cover shall be eliminated before the cover is removed;
- When entrance covers are removed, the opening shall be promptly guarded by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each employee working in the space from foreign objects entering the space;
- The entry supervisor will coordinate any joint NPRCS entries made with outside contractors to ensure this procedure is understood and followed by all involved parties.
- Prior to each entry into a space where the potential for a hazardous atmosphere exists, the internal atmosphere shall be tested. Testing shall be performed using calibrated, direct-read instruments (sampling instrument(s) is/are kept with the Environmental department for the following conditions and in the following order: *NOTE: If initial entry into the space is necessary to conduct the sampling required, the entry must be accomplished utilizing the "Permit Required Confined Space (PRCS) Entry Procedure".
 - oxygen content;
 - flammable gases and vapors; and
 - potential toxic air contaminants.
- The determinations and data required above are made available to each employee who enters the confined space;
- There may be no Hazardous Atmosphere in the confined space whenever any employee is inside;
- Any personal protective equipment deemed necessary shall be available and utilized by entrant(s).
- When appropriate, continuous forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the confined space and shall continue until all employees have left the confined space;
- If a Hazardous Atmosphere is detected during entry:
 - each employee shall leave the confined space immediately;
 - the confined space shall be evaluated to determine how the Hazardous Atmosphere developed; and



- measures shall be taken to eliminate the Hazardous Atmosphere before any subsequent entry takes place;
- A declassification permit verifying that the confined space is safe for entry and that all required measures have been taken will be completed prior to each entry and shall be available to each employee required to enter the confined space. The Safety Officer or designated individual shall be notified prior to entry to review the declassification permit.
- Training shall be provided as outlined in Section V- Training of this program.
- All documentation shall be maintained as outlined in the section "Recordkeeping/Documentation" of this program.

Permit Required Confined Space (PRCS) Entry Procedure {this section may be modified to reflect contractors only if the Department has elected to not perform PRCS entries in house}

NOTE: A confined space classified in this program as a permit-required confined space may be reclassified as a non-permit required space if the provisions outlined above under the classification section entitled "Confined Space Hazard Identification and Evaluation- Non-Permit Spaces" are able to be achieved and sustained.

Pre-Entry

The following procedures shall be performed to verify that acceptable entry conditions exist before a Confined Space Entry Permit will be completed and entry into a PRCS will be permitted:

- A safety meeting will be conducted with employees involved in the entry to review:
 - + the elements of the permit
 - + job specific information regarding the nature of the work to be performed,
 - + the potential hazards associated (including atmospheric conditions),
 - + the correct use of required personal protective equipment and monitoring equipment, and
 - + emergency procedures shall be reviewed;
- A sign shall posted at the entrance to a permit-required confined space containing the following language:

DANGER PERMIT-REQUIRED CONFINED SPACE



The School District of Philadelphia AUTHORIZED ENTRANTS ONLY

- All individuals who are to enter the confined space shall be currently qualified for confined space entry and respiratory protection (NOTE: Employees who are not currently qualified shall not be permitted to conduct confined space entry activities);
- All pipe and lines shall be cleaned out and locked-out prior to entry.
- All electrical and mechanical equipment shall be disconnected and/or de-energized and locked/tagged out; power supplies to pumps are to be shut-off and the controls locked in the "OFF" position by means of padlocks; the Entry Supervisor will retain positive control of all padlock keys; each electrical panel is to be tagged/labeled to indicate the reason why the panels are locked out.
- Air monitoring will be conducted prior to and continuously throughout the entry; the atmosphere shall be checked in an area that would represent the breathing zones of the employees while performing work inside confined space; measurements shall be taken and recorded for the following:
 - oxygen content (Note: no entry shall be made if the oxygen concentration is less than 19.5% without approved supplied air respirators; no entry shall be made if the oxygen content is greater than 23.5% by volume);
 - flammability level (Note: no entry shall be made if the level is greater than 10% of the LEL); and
 - other air contaminants (Note: no entry shall be made if the level(s) is above IDLH; air contaminants above PELs but below IDLH will require use of respiratory protection for entry).
- The Safety Officer shall be notified before entry into Hazardous Atmospheres to review confined space procedures;
- The entrance to the confined space shall be maintained free of obstructions, debris and/or other conditions that prevent ready entry into and exit from the confined space;
- Confined spaces with both side and top openings shall be entered from side openings when practical;
- At least one attendant shall be stationed at the entrance to the confined space. (Note: The Attendant(s) shall have some means to summon medical or other emergency assistance without leaving the confined space entrance);
- A minimum of one additional employee, who may have other assigned duties, must be immediately available within sight or call of the attendant to help in case of an emergency. This

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The School District of Philadelphia additional employee must also be trained as an authorized attendant.

- Communication shall be maintained between the Attendant and Authorized Entrants in the confined space; radio or retrieval line signals must be used when Authorized Entrants are out of sight of the Attendant; affected employees shall be trained in the use of the communication system which shall be tested before each use;
- When entering confined spaces which previously contained flammable or combustible materials, the following ADDITIONAL requirements shall apply:
 - no hot work or ignition sources shall be allowed in or adjacent to the confined space; (**If hot work must be performed, contact Safety Officer for further guidelines)
 - all electrical equipment, including lighting, shall be explosion proof and safe for use in Class I, Department I atmospheres;
 - all monitoring equipment shall be intrinsically safe for use in Class I, Department I atmospheres;
 - ground fault circuit interrupters shall be used as appropriate; and
 - non-sparking tools shall be used;
- The availability of a rescue team shall be verified as able to respond within a five minute response time or must be stationed on site;
- Isolation of a confined space shall be performed to prevent the release of hazardous substances or energy into the space and prevent unauthorized entry;
 - spaces containing flammable, toxic, corrosive, irritating or engulfing liquids or solids must be emptied, flushed or otherwise purged from the space whenever possible;
 - pipes or hoses conveying flammable, toxic, incapacitating or engulfing substances must be disconnected, blanked, or double blocked and bled;
 - mechanical or electrical equipment that could force substances into a confined space or injure workers in the space if energized must be disconnected or de-energized and locked/tagged out;
 - appropriate warning signs and barriers shall be posted at the entrances to confined spaces to protect employees. Signs and barriers shall be removed only after the operation is completed and the confined space is secured.
- If ventilation is required during confined space work in order to minimize concentrations of air contaminants and to maintain the oxygen content at safe levels in the confined space; the following ADDITIONAL considerations shall be made:



- confined spaces shall be ventilated prior to entry and during occupancy;
- whenever a ventilation system is employed, the system shall be evaluated before and during each workshift to ensure that it is functioning properly and that Acceptable Atmospheres are maintained;
- the physical properties of the contaminants within the confined space and the configuration of the confined space shall be considered in determining the ventilation technique to be employed;
- only explosion proof air movers shall be used to ventilate confined spaces;
- whenever possible, air movers shall be used with ducting to increase the efficiency of the ventilation system in the confined space and to prevent recirculation of contaminated air due to ventilation "short circuiting;" and
- when ventilating confined spaces previously containing flammable or combustible products, ventilation equipment shall be bonded or grounded to prevent the build-up and release of static electricity.
- Monitoring for oxygen content, flammable gases or vapors and potential toxic contaminants shall be performed continuously and documented periodically on the entry permit to ensure that changes in atmospheric conditions are identified and workers are adequately protected. Air monitoring instruments that shall be used include combustible gas indicators, oxygen indicators, colorimetric gas detector tubes, organic vapor analyzers, and other direct reading air contaminant measuring devices.
- When preparing to enter a permit-required confined space, the following air testing requirements shall apply:
 - a person with adequate knowledge and training shall perform appropriate confined space testing instruments shall be calibrated and maintained according to manufacturer requirements;
 - initial air testing of the confined space shall be made from outside of the confined space. Initial testing of the confined space shall be completed with mechanical ventilation equipment off so that "worst case" conditions can be assessed;
 - all air testing results shall be recorded on the entry permit; and
 - if the configuration of the confined space prevents initial testing from outside, entry shall not be made until authorization is obtained from the Safety Officer.
- In addition to atmospheric testing, positive steps shall be taken to ensure that employees are protected from physical hazards in the



permit-required confined space, which include, but are not limited to, the following:

- discharge of steam, high-pressure air, water or oil into the confined space, or failure of confined space structural support members;
- falling objects;
- Openings and elevated work areas from which persons may fall;
- Hoses, pipes, tools, or equipment posing trip and fall hazards;
- Wet or oily surfaces posing slip hazards;
- Inadequate lighting;
- Insufficient or faulty personal protective equipment;
- Insufficient or faulty equipment or tools;
- Noise in excess of permissible levels;
- Temperature extremes that could cause heat or cold stress; and
- Electrical shock due to faulty wiring or improper grounding procedures (GFCI protected circuits must be used when electrical equipment is used in a potentially wet environment or outside)
- Selection and use of personal protective and safety equipment shall be determined by the Safety Officer; selection of such equipment is based on the following conditions:
 - Specific work activities of personnel inside the confined space;
 - Type of chemical residues inside the confined space;
 - Actual or potential for development of dangerous air contamination and/or oxygen deficiency; and
 - Potential physical hazards associated with the confined space;
- The personal protective and safety equipment that may be required include:
 - eye and face protection safety glasses, chemical goggles, face shields or full face respirators;
 - Head protection hard-hats;
 - Body protection chemical resistant coveralls, suits, and aprons;
 - Foot protection steel-toe boots and boot covers;
 - Respiratory protection air-purifying respirators, supplied airline respirators, escape packs, and self-contained breathing apparatus;
 - hearing protection ear plugs and ear muffs;
 - Retrieval devices Class II chest harness and Class III full-body harness, wristlets, retrieval line, hoisting device (man-rated top entry extraction winch or hoist);
 - fall protection chest harness, full-body harness and lanyard;



- Warning devices barricades, signs, caution tape and cones; and
- Other equipment first aid kit, eye wash, emergency shower, fire extinguisher, lighting equipment, and ladders.

5. Rescue Operations

All SDP rescues requiring entry into the space will be performed by a qualified outside service. Authorized employees will contact emergency services to perform all such rescue tasks. Procedures shall be developed and implemented for summoning rescue and emergency services, for rescuing entrants from permit spaces, for providing emergency services to rescue employees, and for preventing unauthorized personnel from attempting a rescue. {NOTE: internal entry rescue is <u>not</u> permitted unless there is no feasible manner of ensuring a 5 minute response time AND has a fully trained and certified emergency response team. If this is the case, the Department's emergency response team procedure should be referenced here}

V. TRAINING

A. Initial

Internal initial training is dependent upon the type(s) of confined space entries permitted by the SDP in the program (see guidance/program-Department Entry Status) and shall be performed prior to permitting or authorizing the employee to enter a confined space. As the department has elected to {enter entry option from guidance/program-"Department entry status" section above}, the following training applies to our employees:

- Confined space awareness training is required for SDP employees who
 are not permitted to enter any confined space, including those employees
 in agencies where confined space entry is permitted, but they are not
 authorized to enter. Initial training is required and shall include the
 following elements:
 - a. The hazards associated with confined spaces
 - b. The identification and classification of existing confined spaces
 - c. Clarification of no entry policy
 - d. The characteristics of NPRCS and PRCS and their labeling requirements.
- 2. Confined space training is required for employees who are not authorized to enter any PRCS, but may enter non-permit required

The School District of Philadelphia confined spaces (NPRCS) or spaces declassified to NPRCS. Initial training shall include the following elements:

- a. Clarification of Department NO ENTRY policy regarding PRCS
- b. The hazards associated with confined spaces
- c. The characteristics of NPRCS and PRCS
- e. The identification and classification of confined spaces
- f. Labeling requirements
- g. Methods for declassifying PRCS to NPRCS
- h. Responsibilities and duties of personnel
- i. Air monitoring/testing equipment use
- j. PPE selection, use and requirements
- k. Ventilation
- 1. Review of confined space written program
- m. General contractor requirements
- n. The OSHA confined space standard

B. Refresher

Internal refresher training is dependent upon the type(s) of confined space entries permitted by the Department in the program (see guidance/program-Department Entry Status) and shall be performed as outlined above. The following refresher training applies to our employees:

- 1. Refresher training required where identified as appropriate following the annual review of program, after occurrence of non-compliance with any of the listed training elements, or annually, whichever comes first.
- 2. Refresher training must be conducted as applicable based on annual review of program, contractor permits and NPRCS declassification forms or annually, whichever comes first.
- Refresher training is required on an annual basis and shall be comprehensive. Refresher training must include simulated practice nonentry rescue.

VI. Recordkeeping

The following records will be maintained for each entry:

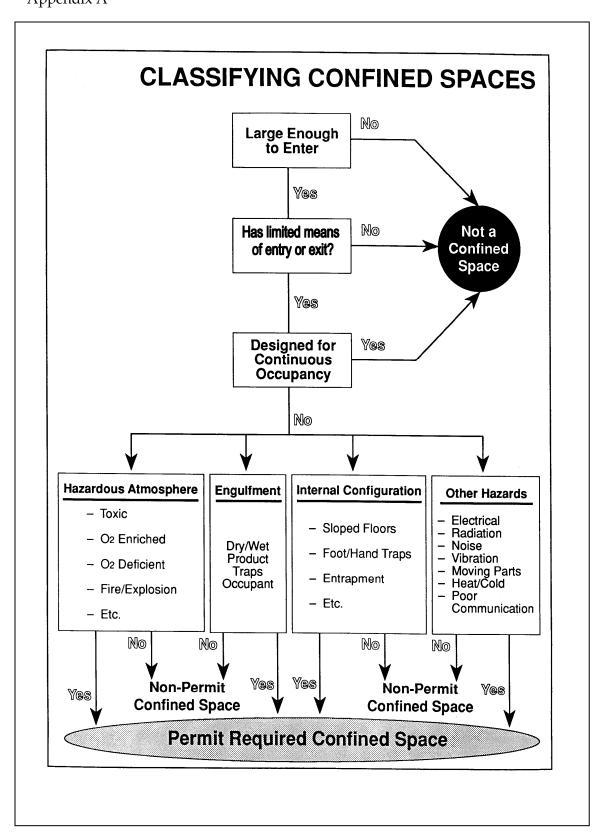
- 1. The type of confined space to be entered
- 2. Known hazards of the space
- 3. Site map showing exact location of the space
- 4. Number of entrants
- 5. Nature of work being performed
- 6. Start and finish dates and times for entries

The following records will be maintained:



- 1. Site evaluation and classification for each confined space present within a Department. (See Appendix C form)
- 2. Confined Space entry permits
- 3. Employee training records and certifications
- 4. Rescue equipment, rescue and PPE inspection (monthly and prior to each use) and maintenance (per mfr. recommendations) shall be retained for a minimum of three years
- 5. Documentation of any agreement(s) made with outside rescue services to act as rescue team for confined space entries







Sulfur Dioxide

The School District of Philadelphia

Appendix B: Sample Permit Required Confined Space Entry Permit

PERMIT VALID FOR 8 HOURS ONLY. ALL COPIES OF PERMIT WILL REMAIN AT JOB SITE UNTIL JOB IS COMPLETED. Date and Time Issued: ______ Date and Time Expires: _____ Job site/Space I.D.: _____ Equipment to be worked on: _____ Work to be performed: __ SUPERVISOR(S) in charge of entry COMMUNICATION PROCEDURES____ RESCUE PROCEDURES (PHONE NUMBERS AT BOTTOM) * BOLD DENOTES MINIMUM REQUIREMENTS TO BE COMPLETED AND REVIEWED PRIOR TO ENTRY* REQUIREMENTS COMPLETION DATE Lock Out/De-energize Line(s) Broken-Capped-Blanked Purge-Flush and Vent Ventilation Secure Area (Post and Flag) Breathing Apparatus Resuscitator - Inhalator Standby Safety Personnel Full Body Harness w/"D" ring Emergency Escape Retrieval Equip Lifelines Fire Extinguishers Lighting (Explosive Proof) Protective Clothing Respirator(s) (Air Purifying) Burning and Welding Permit Note: Items that do not apply enter N/A in the blank. **RECORD CONTINUOUS MONITORING RESULTS EVERY 30 MINUTES CONTINUOUS MONITORING** Permissible Readings Taken_____ TEST(S) TO BE TAKEN Entry Level

+ 2 PPM * 5PPM ___ __ __ __ __ __ __



The School District of Philadelphia *35PPM ____ ___ ___ ___ ___ Ammonia * Short-term exposure limit: Employee can work in the area up to 15 + 8 hr. Time Weighted Avg.: Employee can work in area 8 hrs (longer with appropriate respiratory protection). REMARKS: GAS TESTER NAME INSTRUMENT(S) MODEL SERIAL &/OR USED &/OR TYPE UNIT # ATTENDANT IS REQUIRED FOR ALL CONFINED SPACE WORK CONFINED CONFINED SPACE ATTENDANT(S) SPACE ENTRANT(S) SIGNATURES REQUIRED BY ENTRY SUPERVISOR ENTRY AUTHORIZATION All actions and or conditions for safe entry have been performed. (signature) ENTRY CANCELLATION Entry has been completed, all entrants have exited permit space and

space has been properly closed to prevent unauthorized entry.

(signature)



Appendix C:

List of Identified Confined Spaces [Enter Facility Name Here]

Confined Space Area	Permit Required	Non- Permit Required	Location

Appendix D:

CONFINED SPACE IDENTIFICATION AND HAZARD EVALUATION FORM ID#

SECTION 1 - Confined Space Location						
Confined Space Identification Number:						
Date:						
Area:						
Bldg:						
Room:						
Physical Characteristics and configuration of space :						
		•				
Section 2 - Confined Spa	ce Ass	essme	ent (Ch	eck YES or NO)		
1. Assess if the space meets all of the following criteria to	be con	sidered	as a c	onfined space.		
					YES	NO
a. Large enough and so configured that an employee can bodily enter and perform assigned work:						
b. Limited or restricted means for entry or exit;						
c. Not designed for continuous occupancy.						
2. Is the area a confined space?						
Assess if the confined space has one or more of the foll space	lowing	charact	eristics	to be considered a permit require	ed confir	ned
a. Contains or potential to contain a hazardous atmosphere (If YES, specify in Section 3)						
b. Contains a material that has the potential for engulfing an entrant (If YES, specify in Section 3)						
c. Has an internal configuration such that an entrant could become trapped or asphyxiated (If YES, specify in Section 3)						
d. Contains any other recognized serious safety or health hazard (If YES, specify in Section 3)						
4. Is the space a permit required confined space? (If NO, complete Section 4)						
Section 3 - Hazard Evaluation Checklist - Check	YES, N	O or N	/A for e	existing .potential hazards in th	is spac	е
HAZARD	YES	NO	N/A			
1. [O2] below 19.5 or above 23.5%						
2. Combustible atmosphere						
3. Toxic gases/vapors						
4. Dust, fumes, mist						
5. Inert/O2 displacing gases/vapors						
6. Unfavorable ventilation						
7. Process (specify)						

8. Radiation (Specify)									
HAZARD	YES	NO	N/A	COMMENT	S				
9. Nearby machinery operation									
10. Temperature extremes									
11. Engulfment/entrapment									
12. Tripping/Falls									
13. Electricla									
14. Special rescue considerations									
15. Space tied to other areas by									
16. Biological									
17. Other (Specify)	YES	NO	N/A	COMMENTS					
SECTION 4 - Recommended Equi	pment								
	(Check)				(Check)				
Calibrated direct reading		10. Portabl	10. Portable ventilation system						
2. Safety harnesses and lifelines		11. Non-Sp							
3. Mechanincal retieval/hoisting		12. Ladder							
4. Communication equipment		13. Secure							
5. SCBA or Type C air line		14. Resuci							
6. Special rescue considerations		15. Fire Ex							
7. Personal protective equipment		16.							
8. Electrical equipments/Lighting/		17.							
9. Traffic barriers/entrance covers		18.							
SECTION 5 - EMERGENCY CONT	ACT INFO	RMATION							
SECTION 6 - NOTES/COMMENTS									
*This form is for identification and evaluation puposes only.									
It does not replace a Confined Space Permit authorized by the department Safety Officer.									