



CONSTRUCTION ENVIRONMENTAL HEALTH & SAFETY EXHIBIT

CONFINED SPACES IN CONSTRUCTION

I. Definitions

- A. Confined Space: As defined by 29CFR Part 1926.1202, is any space that meets all three of the following criteria:
 - 1. It is large enough and so configured that an Employee can bodily enter and perform assigned work;
 - 2. It has limited or restricted means for entry or exit; and
 - 3. It is not designed for continuous Employee occupancy.
- B. Permit-Required Confined Space (PRCS): As defined by 29CFR Part 1926.1202, is any space that meets any one of the following criteria:
 - 1. It contains or has a potential to contain a hazardous atmosphere;
 - 2. It contains a material that has the potential for engulfing an entrant;
 - 3. It 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. It contains any other recognized serious safety or health hazard.
- C. Entry: The action by which any part of a worker passes through an opening into a permit-required confined space. Entry includes ensuring work activities in that space and is considered to have occurred as soon as worker's body breaks the plane of an opening into the space, whether or not such action is intentional, or any work activities are performed in the space.
- D. Host employer: The employer that owns or manages the property where the construction work is taking place.

II. General Requirements

- A. All confined spaces, whether new installations or existing, shall initially be considered permit-required, as defined by the OSHA Standard. Confined spaces may be reclassified only after a documented review by the competent person responsible for the entry indicates that no additional hazards as outlined in the PRCS definition are present and that no additional hazards will be introduced to the space because of the work to be performed. All permit-required confined space entries shall be conducted in compliance with 29CFR Part 1926.1204 through 1926.1210.

III. Notifications

- A. Entry into existing confined spaces owned and/or operated by Harvard University requires notification to Harvard University Project Manager (HUPM) or his designee and the Harvard University Operations Center. It is expected that coordination between the HUPM and Contractor will take place prior to entry. This coordination must include a review of the hazards associated with the space, the contents of the space, the location of critical systems located in the confined space, as well as a review of the operations to take place inside the confined space by the Contractor performing the work.
- B. Any potential impacts to existing (i.e. Harvard-owned/operated) systems shall be cause for the HUPM and/or the Contractor to notify the appropriate Harvard support group (e.g. Engineering & Utilities; Operations Center, etc.).
- C. The Designated Contractor Safety Manager or Project Superintendent shall be notified prior to any confined space entry.

NOTE: Harvard University is considered a "Host Employer" on all Harvard University owned and managed properties. As such, the HUPM and the Harvard University Environmental



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Health & Safety (HUEHS) Department must be kept apprised of the activities associated with the confined space to include the duration and any unanticipated hazards. In addition, a meeting should be held between the controlling contractor, the entry contractor, and the HUPM prior to and after all entries as described below.

IV. Entry Requirements

- A. The employer's Competent Person shall ensure that all Employees involved in the confined space entry possess the knowledge and skill required to perform the duties for which they are assigned. In addition, a hazard analysis shall be completed prior to the entry. At a minimum, the hazard analysis and Confined Space Permit shall be used to conduct a pre-entry training and briefing for all crew members entering, attending, and or supervising the confined space entry.
- B. Energy sources that pose potential risk to entrants shall be eliminated, locked and tagged out in compliance with the HUEHS Construction Standard Exhibit: Control of Hazardous Energy (LO/TO). A description of the potential energy sources and the methods used to eliminate the potential release of hazardous energy shall be listed in the hazard analysis. Potential energy sources include but are not limited to electrical, pneumatic, hydraulic, steam, water, and gas systems.
- C. For permit-required space entries, provisions for the rescue of entrants shall be made prior to entry. Non-entry rescue is the preferred means for retrieval (i.e. tripod/winch, etc.). Where non-entry rescue is not possible (due to the space configuration, opening size, number of entrants, etc.), provisions for rescue must be coordinated prior to entry. These provisions may include coordination with the local Fire Department. Where the local Fire Department is not available for rescue, the Contractor is responsible for providing entry-rescue provision. Where Contractors provide their own rescue services, these services shall comply with the criteria listed in 29CFR Part 1926.1211, Rescue and Emergency Services as reviewed by HUEHS.

V. New Space Identification

The Contractor shall identify any new confined spaces created as part of the construction project. The Contractor shall provide a list to the HUPM, HUEHS, and the Building owner manager of the new confined space, the hazards within, and the location and specific space details. This information will be entered into the University Confined Space Database and signed appropriately.

VI. Reference

1926.1200, Confined Spaces in Construction