



# CONFINED SPACE ENTRY PROGRAM

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### PURPOSE

The purpose of this safety policy is to provide information and guidance for the protection of Tate Engineering Systems Inc. employees who work around or enter confined spaces.

### SCOPE AND APPLICABILITY

A confined space/area by design has limited openings for entry and exit; has unfavorable natural ventilation, can contain or produce dangerous air contaminants, and is not intended for continuous employee occupancy. Therefore, confined spaces can have, or create, hazards for employees who perform work activities in them. Confined spaces may be permitted or non-permitted confined spaces. Confined spaces are located at client facilities serviced and inspected by Tate employees, each having its own set of hazards associated with them.

This safety policy provides guidelines for the protection of Tate employees that must work in or around confined spaces. It includes training components and discussion on what defines a confined space. This safety policy lists practices to identify confined spaces and notes the hazards of confined spaces. Additionally, it lists methods to evaluate confined spaces and the requirements for permit-required confined space entry. This document also provides recordkeeping requirements.

This safety policy details the areas of responsibility for Tate managers, supervisors, employees, entrants, attendants, entry supervisors, qualified persons and Safety Management. It also applies to Tate employees who do not enter, but may be exposed to work around confined spaces.

This document applies to any operation that requires Tate employees to enter or work inside any existing tank, tower, sewer, manhole, sump, vault, vat, processing vessel, pit, tunnel, or similar confined spaces. This safety policy applies, but is not limited, to the following Tate employees and operations:

- Employees that enter trenches
- Employees that enter service areas below the weather deck of a vessel, excluding the engineering room below a deck



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- Any work in pipes or culverts
- Employees that conduct inspections of sewage and water treatment facilities located at municipal and company sites
- Employees that must access manholes, whether they enter them or not
- Work in catch basin areas
- Employees that enter sewer lift stations for inspection or maintenance service
- Entry into grease pits at maintenance or equipment shops
- Employees that enter caissons/drilled shafts
- Access to certain animal/marine life holding cells, tanks and maintenance access areas
- During storage tank inspections

Tate Engineering Systems' Confined Space Entry Program is in two parts: **entry requiring a permit and entry not requiring a permit**. In each case, an Entry Supervisor (*Competent Person*) must be designated for the project. This individual is responsible for implementing the Confined Space Entry Program. Persons designated as Entry Supervisors must meet the following requirements:

- Must have successfully completed an OSHA approved 30-hour course for either Construction or General Industry, or an equivalent qualification such as EM 385 or OSHA 510/500.
- Completed the training outlined in the "Employee Training" portion of this program.

### DEFINITIONS

A confined space or vessel is defined as a space that:

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 means of entry.);and
3. Is not designed for continuous employee occupancy.

A "permit-required confined space" (permit space) means a confined space that has one or more of the following characteristics and can only be entered if written permit is completed, verified, and issued:

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 (example: hoppers, silos): or
4. Contains any other recognized serious safety or health hazard.



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Oxygen deficiency is an atmosphere containing oxygen at a concentration of less than 19.5 percent by volume.

Oxygen danger occurs in atmosphere containing less than 19.5% or more than 23.5% by volume oxygen.

Dangerous air contamination is an atmosphere presenting a threat of causing death, injury, acute illness or disablement due to the presence of flammable and/or explosive, toxic or otherwise injurious or incapacitating substances.

### ADDITIONAL REQUIREMENTS

In addition to the requirements found within the Confined Space Program, all employees must strictly adhere to all requirements of the Tate Engineering Systems Safety Manual. Most notably, the following sections have specific requirements that pertain to confined space entry:

- Lockout Tagout
- Welding Operations
- Personal Protective Equipment
- Compressed Gas Safety
- Gas Monitor Testing
- Respirator Program
- Accident Response

Choose this model when the Work Hazard Analysis indicates that the workspace meets the criteria for a confined space or vessel, but **does not** meet the criteria for a permit-required confined space.

### INTRODUCTION

When Tate Engineering Systems has determined that entry into an area classified by OSHA as a Confined Space, as defined above, is necessary to perform required mechanical construction or service work then entry will be done without a permit. The purpose of this program is to protect our workers, who will enter the space, from confined space hazards.

This confined space program applies to all company employees who are required to enter into a Confined Space. Before starting work on this project, all company employees who will work at this job site will be:

- informed about the presence and location of the Confined Spaces(s);
- informed about any specific hazards that may require re-classifying the space as a Permit-required Confined Space; and
- instructed not to enter the space for any reason until the appropriate training has been completed and entry has been authorized following the completion of the pre-entry checklist.



## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WITHOUT A PERMIT**

### **IDENTIFYING CONFINED SPACES**

Tate Engineering Systems' workers perform mechanical construction and service work in many different and varied customer facilities. Listing all Confined Spaces would be impossible. Therefore, it is absolutely essential that the Service Manager complete a Work Hazard Analysis for the project and investigate all potential Confined Spaces. Adherence to this program is absolutely mandatory prior to allowing workers to enter any space that may meet the criteria of a Confined Space.

### **POTENTIAL HAZARDS**

The types of potential hazards that may exist at jobsites are as varied as our customers, the types of facilities and the types of equipment we work on. Again, it is absolutely essential that the Service Manager for the project investigate all potential Hazards and adhere to this program prior to allowing workers to enter any space that may meet the criteria of a Confined Space. Some possible hazards that may exist include, but are not limited to:

- Explosive and/or flammable gases and vapors;
- Oxygen deficient atmosphere;
- Materials that may engulf workers;
- Other serious hazards.

### **ENTRY**

- All confined spaces are treated as Permit-required Confined Spaces until pre-entry procedures determine that the atmosphere inside is safe for entry. A Confined Space Pre Entry Checklist must be completed and returned to the Service Manager once the project is completed. Copies of completed Checklist should be kept with other account information by the Service Manager.
- The Service Manager will verify entrants and attendant have all operating equipment and have been trained on rescue procedures.
- A written copy of operating and rescue procedures will be available at the job site for the duration of the job.
- The Confined Space Pre-entry Checklist will be completed by the Entry Supervisor who is designated for the project.
- The checklist and Confined Space Certification will be kept at the job site for the duration of the job.
- If there is an interruption in the work, the space will be reevaluated and a new Checklist and Confined Space Certification will be completed before re-entry occurs.



## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WITHOUT A PERMIT**

### **PRE-ENTRY PRECAUTIONS**

- Notify affected departments of service interruption.
- Lock-out/tag-out all sources of energy (e.g. steam, electric, mechanical) posing a risk to workers.
- All pumps, pipes or lines that may cause contaminants to flow into the space will be:
  - disconnected;
  - shut down and locked out according to established lockout/tagout procedures; or
  - effectively isolated by other means.
- Clean and/or purge any chemical storage vessel.
- Wear appropriate personal protective and respiratory protection.
- Have lights and or ladder available.
- If coordination is needed with contractors, see Contractor Checklist.
- Have appropriate MSDS's (Material Safety Data Sheet).
- Determine how often air monitoring will be conducted.

### **SURVEILLANCE**

The area surrounding the confined space will be surveyed to avoid hazards such as drifting vapors from fuel tanks, piping, process equipment, etc. Atmosphere within the confined space must be monitored periodically to assure that conditions are stable and that continued presence within the confined space is safe. The survey includes verifying that the vehicle/pedestrian traffic barriers are in place and others are

staying out of entry area. Barricades must be in place to prevent vehicle and/or pedestrian traffic to ensure the safety of the entrants, attendant, and the public in general.

### **TESTING**

- The atmosphere inside the confined space has been tested to determine whether dangerous air contamination and/or oxygen-deficiency exist.
- Only equipment approved for the purpose by the manufacturer will be used for atmospheric testing
- Testing will be performed by the Entry Supervisor who is designated for the project.
- The Entry Supervisor who is designated for the project must have received gas detector training for the type of testing equipment being used within one year prior to the date of entry.
- The minimum test parameters must be established from reliable sources prior to testing.
- A written record of pre-entry test results will be kept at the job site for the duration of the job.



## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WITHOUT A PERMIT**

- Before entry into the confined space is authorized, the Entry Supervisor will certify in writing, based on the results of the pre-entry testing, that the space is safe for entry as a non-permit-required confined space.
- Affected workers will be permitted to access and review the testing results at any time.
- When there are two adjoining or connecting confined spaces, the most hazardous conditions will govern how work is to be performed.

### **ENTRY PROCEDURES**

Entry into the non-permit-required confined space will be allowed when:

- there are no atmospheric hazards present;
- pre-entry tests show there is no dangerous air contamination and/or oxygen-deficiency within the confined space; and
- there is no reason to believe that any hazardous conditions are likely to develop.
- continuous testing of the atmosphere within the confined space in the immediate vicinity of the workers within the space will be performed.
- all workers inside the confined space will exit the space immediately if any of the gas monitor alarm set points are reached.
  - the workers will not return to the area until the Supervisor who completed the original gas monitoring has used the monitor to determine that it is safe to enter.

### **RESCUE**

Arrangements for rescue services will not be made unless conditions change requiring the use of a permit. At least one of the non-entrants must be trained in first-aid/CPR and must be aware of how to summon rescue and emergency services.



## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WHERE A PERMIT IS REQUIRED**

Choose this model when the space meets the criteria for a “permit-required confined space”. Entry into a permit-required confined space may not be made until the Corporate Safety Director has reviewed and approved operating and rescue plans.

### **INTRODUCTION**

When Tate Engineering Systems has determined that entry into an area classified by OSHA as a Permit-required Confined Space is necessary to perform the required mechanical construction or service work, then entry will **NOT** be done without a permit. The purpose of this program is to protect our workers, who will enter the space, from confined space hazards.

This confined space program applies to all company employees who are required to enter into a Permit-required Confined Space. Before starting work, all company employees who will work at the job site will be:

- informed about the presence and location of the Permit-required confined Space(s);
- informed about the specific hazards which led to the classification of space as a Permit-required; and
- instructed not to enter the space for any reason until the appropriate training has been completed and the entry permit has been approved.

### **IDENTIFYING PERMIT-REQUIRED CONFINED SPACES**

Tate Engineering Systems’ workers perform mechanical construction and service work in many different and varied customer facilities. Listing all Confined Spaces would be impossible. Therefore, it is absolutely essential that the Service Manager complete a Work Hazard Analysis for the project and investigate all potential Confined Spaces. Adherence to this program absolutely mandatory prior to allowing workers to enter any space that may meet the criteria of a Confined Space.

### **POTENTIAL HAZARDS**

The types of potential hazards that may exist at jobsites are as varied as our customers, the types of facilities and the types of equipment we work on. Again, it is absolutely essential that the Service Manager for the project investigate all potential Hazards and adhere to this program prior to allowing workers to enter any space that may meet the criteria of a Confined Space. Some possible hazards that may exist include, but are not limited to:

- Explosive and/or flammable gases and vapors;
- Oxygen deficient atmosphere;
- Materials that may engulf workers;
- Other serious hazards.



## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WHERE A PERMIT IS REQUIRED**

### **ENTRY PROCEDURE**

- A written copy of operating and rescue procedures will be available at the job site for the duration of the job.
- The Permit will be completed before it is submitted for approval.
- The Permit will verify completion of:
  - control of atmospheric and engulfment hazards;
  - surveillance of surrounding areas for the purpose of hazard avoidance;
  - testing of the atmosphere;
  - space ventilation;
  - entry procedures; and
  - rescue.
- Entrants must review the permit before entry and be satisfied with the air monitoring data including meter calibration.
- Entrants must review the permit before entry and be satisfied with rescue procedures.
- Entrants must be made aware that they can at any time exit to request a re-evaluation of the space.
- The Permit will be kept at the job site for the duration of the job and canceled at upon completion.
- If there is an unplanned interruption in the work, the permit will be canceled, the space will be reevaluated, and a new Permit will be completed.

### **PRE-ENTRY PRECAUTIONS**

- Under no circumstances may an entry be performed where there is an Immediately Dangerous to Life and Health (IDLH) condition. If the atmospheric conditions in the space cannot be controlled, then no entry may be performed.
- Notify affected departments of service interruption.
- Lock-out/tag-out all sources of energy (e.g. steam, electric, mechanical) posing a risk to workers.
- All pumps, pipes or lines that may cause contaminants to flow into the space will be:
  - disconnected;
  - shut down and locked out according to established lockout/tagout procedures; or
  - effectively isolated by other means.
- Clean and/or purge any chemical storage vessel.
- Wear appropriate personal protective and respiratory protection.





## **CONFINED SPACE ENTRY PROGRAM FOR ENTRY WHERE A PERMIT IS REQUIRED**

- Have lights and or ladder available.
- Coordinate with owner and other contractors.
- Have appropriate MSDS's (Material Safety Data Sheet).
- Determine how often air monitoring will be conducted.
- Determine start and end times for authorized entry.
- Assign roles and responsibilities in compliance with 1910.146 for entrant(s), attendant, and entry supervisor for each permit-required confined space entry.
- Each entry requires its own attendant. An attendant is only allowed to monitor one entry at a time.
- Set up non-entry rescue equipment (tri-pod, harness) as necessary.
- Identify rescue service.
- Determine communication method between entrant/attendant.
- Conduct pre-entry briefing: review hazards, procedures and precautions.
- Sign and post the Permit/Certification at the site.

### **SURVEILLANCE**

The area surrounding the confined space will be surveyed to avoid hazards such as drifting vapors from fuel tanks, piping, process equipment, etc. Atmosphere within the confined space must be monitored continuously to assure that conditions are stable and that continued presence within the confined space is safe. The survey includes verifying that the vehicle/pedestrian traffic barriers are in place and others are staying out of entry area. Barricades must be in place to prevent vehicle and/or pedestrian traffic to ensure the safety of the entrants, attendant, and the public in general.

### **TESTING**

- The atmosphere inside the confined space was tested to determine whether dangerous air contamination and/or dangerous oxygen concentrations exist.
- Only equipment approved for the purpose by the manufacturer will be used for atmospheric testing
- Testing will be performed by the Entry Supervisor who is designated for the project.
- The Entry Supervisor who is designated for the project must have received gas detector training for the type of testing equipment being used within one year prior to the date of entry.
- The minimum test parameters must be established from reliable sources prior to testing.
- A written record of pre-entry test results will be kept at the job site for the duration of the job.



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- Affected workers will be permitted to access and review the testing results at any time.
- When there are adjoining or connecting confined spaces, the most hazardous conditions will govern how the work is to be performed.

### **SPACE VENTILATION**

- Mechanical ventilation systems will be set at 100% outside air.
- Additional ventilation sources, where applicable, such as manholes, doorways, etc., will be opened to increase air circulation.
- Portable blowers will be used to augment natural circulation if needed.
- Testing will be repeated after a suitable ventilation period.

### **ENTRY PROCEDURES**

- All entrants must have the proper training before entry begins.
- All entrants entering the space must have appropriate PPE.
- At least one attendant will be stationed outside to perform attendant duties.
- The attendant will have appropriate PPE available for immediate use.
- All entrants entering vertically accessed space will use a safety harness attached to a lifeline that is secured outside the opening.
- Continuous communications will be maintained between the workers within the space and the attendant.
- If there is any questionable action or non-movement by a worker inside, a verbal check will be made. If there is no response, the entrant will be removed immediately.
- The attendant will attempt to remove a disabled entrant from outside the space after summoning for rescue team.
- The attendant may enter the space only: in an emergency; after being relieved by a backup attendant; is properly trained in rescue operations; and is equipped with proper PPE.
- Where the use of a hoisting device, safety harness and/or wristlets may endanger a worker, their use will be discontinued.
- Only Class 1, Division 1 rated lighting and electrical equipment will be used inside confined spaces where explosive or flammable substances are present.
- Continuous gas monitoring will be performed throughout confined space entry operations.



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### **RESCUE**

- Prior to entry, a rescue plan must be developed and approved by the Branch Service Manager
- The Branch Service Manager with the assistance of the Safety Manager shall decide whether the use of third party rescue personnel is appropriate
- Local authorities (i.e. fire, EMS, police) shall be notified of the entry at time of entry, whether or not they are the primary rescue responders
- In addition to the primary responders, local authorities will be summoned during emergency situations
- Where mechanical hazards to an injured person are present, workers at the site will implement emergency procedures and de-energise/LOTO mechanical hazards.



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### SPECIFIC DUTIES DURING ENTRY INTO PRCS

AUTHORIZED ENTRANTS must perform the following:

- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Properly use equipment as required;
- Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space;
- Alert the attendant whenever:
  - The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or
  - The entrant detects a prohibited condition;
- Exit from the permit space as quickly as possible whenever:
  - An order to evacuate is given by the attendant or the entry supervisor,
  - The entrant recognizes any warning sign or symptom of exposure to a dangerous situation,
  - The entrant detects a prohibited condition, or
  - An evacuation alarm is activated.

ATTENDANT has an important job and must perform in accordance to the following:

- Know the hazard(s) that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Is aware of possible behavioral effects of hazard exposure in authorized entrants;
- Continuously maintains an accurate count of authorized entrants in the permit space documented by each entrant name and is legible to others;
- Remains outside the permit space during entry operations until relieved by another attendant;
- Communicates with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space;
- Monitors activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions;
  - If the attendant detects a prohibited condition;



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- If the attendant detects the behavioral effects of hazard exposure in an authorized entrant;
- If the attendant detects a situation outside the space that could endanger the authorized entrants; or
- If the attendant cannot effectively and safely perform all the duties required by this program.
- Verbally summons on-site rescue personnel and telephones other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards;
- Takes the following actions when unauthorized persons approach or enter a permit space while entry is underway:
  - Warn the unauthorized persons that they must stay away from the permit space;
  - Advise the unauthorized persons that they must exit immediately if they have entered the permit space; and
  - Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space;
- Performs non-entry rescues as specified by the employer's rescue procedure; and
- Performs no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.
- An attendant is only authorized to be responsible for one confined space. At no time will a single attendant be allowed to watch two or more spaces at the same time.

### ENTRY SUPERVISOR must perform the following duties:

- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Verifies, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin;
- Terminates the entry and cancels the permit;
- Verifies that rescue services are available and that the means for summoning them are operable;
- Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations; and
- Determines, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.



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### POST-ENTRY PROCEDURES

Once the work has been completed, the customer contact must be notified and have an opportunity to view the work from outside the space before the permit space is closed.

Close off the permit space in accordance with the following sequence:

1. Entrant exits with all tools, equipment, excess materials, and debris, leaving the space in a ready to use state.
2. Attendant has Entrant sign the permit with the time that s/he made the space ready for use.
3. Entrant physically closes the permit space and secures the door to make it ready for use.
4. Attendant dismisses the on-site rescue personnel.
5. Entrant removes all lockout/tagouts to make the system ready to operate.
6. Attendant has Entrant sign the permit with the time that s/he made the system ready to operate.
7. Attendant forwards the permit to the Entry Supervisor to cancel.
8. If the permit was issued by the customer, it is returned to the customer. If the permit was a Tate issued permit, it is maintained for a period of at least one year.

**Any incident that requires that the rescue plan be implemented must be reported to the Safety Manager as soon as practical.**



## **CONFINED SPACE ENTRY PROGRAM**

### **EMPLOYEE TRAINING**

Tate Engineering Systems will provide training so that employees acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned while working in or near confined spaces.

#### **GENERAL TRAINING**

Training will be provided to all employees whose work is regulated by the confined space program. All employees will successfully complete training covering:

- control of atmospheric and engulfment hazards;
- surveillance of surrounding areas for the purpose of hazard avoidance;
- testing of the atmosphere;
- space ventilation;
- entry procedures; and
- rescue.

Training will be completed:

- before work is assigned;
- before there is a change in assigned duties;
- whenever there is a change in operations that presents a new hazard;
- whenever there are deviations from established entry procedures; and
- whenever inadequacies in a worker's knowledge on the subject become evident.

The training will establish employees' proficiency in their duties and introduce new or revised procedures, as necessary, to comply with the confined space rules.

#### **SPECIFIC TRAINING**

Based on the duties of each category of Confined Space Worker, specific training program elements have been established for:

- Entrants
  - Tate Engineering Systems Confined Space Program
  - OSHA's Confined Space Entry Requirements
  - Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.



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- Properly use tools, equipment, and materials as required for entry.
- Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space.
- Alert the attendant whenever:
  - There is any warning sign or symptom of exposure to a dangerous situation.
  - There is a prohibited condition.
- Exit from the permit space as quickly as possible whenever:
  - An order to evacuate is given by the attendant or the entry supervisor.
  - Any warning sign or symptom of exposure to a dangerous situation exists.
  - There is a prohibited condition.
  - An evacuation alarm is activated.
- Attendants
  - Tate Engineering Systems Confined Space Program
  - OSHA's Confined Space Entry Requirements
  - The potential hazardous conditions associated with the entry
  - The proper tracking of authorized entrants in and out of the space.
  - The prohibition of unauthorized personnel from entering the space.
  - The prohibition of performing other activities outside of these designated duties.
  - The proper use of PPE
  - The proper use of atmospheric testing devices
  - Remains outside the space unless relieved by another attendant.
  - Monitoring of hazardous conditions and takes appropriate action
  - Summoning emergency responders
  - Properly communicates with emergency responders
  - Non-Entry rescue procedures
- Entry supervisors
  - Tate Engineering Systems Confined Space Program
  - OSHA's Confined Space Entry Requirements
  - Confined space evaluation
  - Completion of pre-entry items to verify entry is permissible.
  - The termination of entry and cancelation of permit.





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- The potential hazardous conditions associated with the entry
- The proper use of PPE.
- The proper use of atmospheric testing devices
- Monitoring of hazardous conditions
- The prohibition and removal of unauthorized personnel from area.
- Summoning emergency responders
- Properly communicating with emergency responders
- Non-Entry rescue procedures

### **TRAINEE CERTIFICATION**

Tate Engineering Systems will certify that the training required has been accomplished and that the employee is proficient in his or her authorized duties. The certification will contain each employee's name, the signatures or initials of the trainers, and the dates of training.

### **REFRESHER TRAINING**

Refresher training will be provided as needed to maintain employee proficiency in entry procedures and safety.

### **ANNUAL REVIEW OF CANCELED PERMITS AND PROGRAM**

In the event of an incident or a near-miss, the permit and entry must be reviewed as soon as practical and no later than 10 days after the permit was canceled. All other permits issued by Tate Engineering Systems must be reviewed within a 12 month period to strengthen the confined space program.