

 NEW Organic Digestion	NEW Organic Digestion, LLC Safety Management System		DEN.SAFE.POL.140-003.ConfinedSpace	
			Initial Issue Date	06/01/2014
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Purpose:

NEW Organic Digestion, LLC is committed to creating a safe workplace for all personnel and a safe and effective permitted confined space entry program is an important component of our overall safety plan. NEW Organic Digestion, LLC goal is to provide all exposed personnel with a clear understanding of the safe work practices involved in this Permit Required Confined Space (PRCS) program and to ensure their involvement.

Scope

Entry into confined spaces for the purpose of performing inspections, maintenance, repairs, construction, and emergency work is a necessary part of performing operational tasks. This PRCS program describes some of the hazards associated with confined space entry and the necessary precautions to take prior to performing any work at facilities where employees and/or contract personnel must enter a permit-required confined space as part of their job duties. All entries must comply with OSHA 1910.146, as applicable.

The Safety Department reviews and updates the program as necessary. Under this program, all confined spaces are evaluated and classified as either a:

- Permit Required Confined Space (PRCS),
- PRCS Alternate Entry (Re-Classified),
- Non-Permit Required Confined Space (Re-Classified), or a
- Confined Space

Primarily, all confined space evaluations are performed and the survey requirement met through the use of existing records and knowledge of the space. For example, entry into any storage tank or cargo vessel that is used for the transportation or storage of fuel is a Permit Required Confined Space until it can be cleaned and declassified. All identified Permit Required Confined Spaces shall have signs posted where entry into the space is easily accessible. For those permit spaces where entry is not easily accessible, e.g. locked entry cover, where special tools are required to gain entry, etc., a sign may not be required as long as all exposed personnel are trained in the danger posed by the permit spaces. In most cases there will be a sign present.

RESPONSIBILITIES

The first step in working around or in confined spaces is to classify the space. The confined space type (Permit-Required, Alternate Procedure, Non-Permit required or other confined space) must be determined, to establish other procedures that apply or may apply.

Permit Required Confined Space Entry: Entry occurs whenever a part of a person's body breaks the plane of an opening into the confined space. No person may enter a Permit Required Confined Space until acceptable entry conditions have been met and a Work Authorization Permit has been issued prior to entry.

Confined Space: A space with the following characteristics:

- Large enough and so configured that an employee can bodily enter and perform assigned work.

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- Has limited or restricted means of entry or exit (for example: tanks, tank trailers, certain excavations, bell holes, pipeline pits, valve boxes, vaults, sumps, pipe interiors, and process tanks including digesters).
- Is not designed for continuous employee occupancy.

Permit Required Confined Space (PRCS): A space that meets the definition of a Confined Space, plus has one or more of the following characteristics:

- Contains or has the potential to contain a hazardous atmosphere,
- Contains a material that has the potential for engulfing an entrant,
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section, or
- Contains any other recognized serious safety or health hazards.

Note: In order for “serious and health hazard” to be recognized as being an impairment to escape, its severity potential for resulting in physical harm to an employee must be considered.

PRCS-Alternate Entry Confined Space (Re-classified):

A permit required confined space that has been re-classified as an alternate entry by demonstrating that the only hazard posed by the confined space is an actual or potential hazardous atmosphere, and such hazard can be controlled by continuous forced air ventilation that allows acceptable entry conditions. Continuous monitoring is required to verify that atmospheric hazards are not present. If entry is required to obtain initial monitoring data the entry must be conducted according to full PRCS procedures. All monitoring must be documented on the Work Authorization Permit.

Non-Permit Required Confined Space (Re-classified):

A permit required confined space that has been re-classified as a non-permit required confined space because the space no longer poses any actual or potential atmospheric hazards and all hazards within the space are eliminated without entry into the space; the permit space may be re-classified as a non-permit confined space as long as the non-atmospheric hazards remain eliminated.

Note: When a PRCS is re-classified to a non-permit required confined space the re-classification must be documented through a certification that contains the following:

- date re-classified,
- location of the space, and
- signature of the person who re-classified the space.

Confined Space: A space that meets the definition of a confined space as defined in this section and where there are no characteristics present in the confined space as listed:

- Contains or has the potential to contain a hazardous atmosphere,
- Contains a material that has the potential for engulfing an entrant,

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- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section; or
- Contains any other recognized serious safety or health hazards.

Hazardous Atmosphere: Hazardous atmospheres means an atmosphere that may expose personnel to the risk of death, incapacitation, impairment of ability to self-rescue (e.g., escape unaided from a permit space), injury, or acute illness from one or more of the following:

- Flammable gas, vapor or mist in excess of 10% of the Lower Flammable Limit (LFL) or Lower Explosive Limit (LEL).
- Airborne combustible dust at a concentration that meets or exceeds its LFL
- Oxygen deficiency or enrichment: Levels below 19.5% or above 23.5%.
- Atmospheric concentrations of airborne substances in excess of permissible exposure limits (as published in OSHA 29 CFR 1910, Subpart G or Subpart Z). Examples: Gases such as hydrogen sulfide, carbon monoxide, benzene; airborne particles from removal of paint; cleaning of tanks which previously contained leaded or other toxic products; certain welding fumes.
- In the absence of published PELs, other reference exposure data such as ACGIH or NIOSH will be referenced.

Any other atmospheric condition that is immediately dangerous to life and health (IDLH). A confined space's classification (as PRCS, PRCS Alternate Entry, or other) depends on the actual or potential hazards present, which may change over time. A PRCS may be re-classified as outlined below:

- Classification downgrade: A PRCS or PRCS Alternate Entry Confined Space may be downgraded to a non-permit Confined Space if testing and inspection during entry demonstrate that applicable hazards have been eliminated, for whatever time the serious hazards are removed or controlled. The use of personal protective equipment does not constitute control of such serious hazards. Control of atmospheric hazards by forced-air ventilation does not constitute elimination of the hazard. The basis for reclassification must be documented on the Work Authorization Permit.
- Classification upgrade: A PRCS Alternate Entry Confined Space or a non-permit Confined Space must be reclassified if acceptable entry conditions established on the Work Authorization Permit are not maintained.

A Work Authorization Permit shall to be used along with the NEW Organic Digestion, LLC Health & Safety Manual and/or other applicable procedures whenever entry into a Permit Required Confined Space is performed. The Work Authorization Permit may be used to identify the scope of work, including items such as:

- Safe work
- Lockout/Tagout
- Confined Space
- Hot Work
- Local Work Procedure

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Work Authorization Permits completed for Permit Required Confined Space entries must be retained for at least one year. All completed permits must be forwarded to the Safety Manager. The following review must be conducted, as applicable.

- Review entry operations when NEW Organic Digestion, LLC management has reason to believe that the measures taken under the PRCS program do not protect exposed personnel, and revise the program to address identified findings before subsequent entries are authorized.
- 12-month annual review of all actual PRCS entries.

Examples of circumstances requiring a review of entry operations (in addition to annual review) are as follows:

- any unauthorized entry of a permit space,
- the detection of a permit space hazard not covered by the permit or program,
- the detection of a condition prohibited by the permit - any injury or near-miss during entry
- a change in the use or configuration of a permit space, or
- employee complaints about the effectiveness of the program.

Prior to entering any PRCS, a Work Authorization Permit must be used. Entry into any PRCS without a permit is not allowed under any circumstances. Any entry into a PRCS without a Work Authorization Permit will subject all personnel involved in the unauthorized entry to disciplinary procedures up to and including termination.

Hazard assessment: Follow Work Authorization Permit procedures to assess potential hazards.

Hazardous liquids and gases: Prior to isolation, minimize presence of hazardous materials within the space. Empty, flush and/or purge as much as possible

Isolation: Protect personnel against the release of stored energy and material into the space. Types of energy include substances under pressure, mechanical, electrical, and stored energy.

Prevent unauthorized entry: Whenever the space is unattended, prevent unauthorized entry or accidental falls into confined spaces either by guarding openings or by placing effective barriers to prevent entry.

Venting: Minimize potential atmospheric hazards by opening and ventilating the space prior to entry. Use portable blowers to augment natural circulation if needed.

Atmospheric monitoring: Before any personnel enters any confined space, the internal atmosphere shall be tested with a calibrated, direct-reading instrument, for the following conditions in the order given:

- oxygen content - no entry allowed below 19.5% or above 23.5%, and
- flammable gas and vapor - no entry allowed above 10% of LEL (0% if *hot work* is to be performed).

Potential toxic air contaminants - no entry above the *Immediately Dangerous to Life or Health (IDLH)* level of any toxic contaminant

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Provide each authorized entrant or that person's authorized representative with the opportunity to observe any monitoring or testing of permit spaces.

Permit: Prior to any entry to the confined space:

- applicable sections of the Work Authorization Permit must be completed
- permit must be signed by NEW Organic Digestion, LLC and/or **Contractor Representatives** as applicable
- permit must be posted or immediately accessible at the entrance to the space
- permit duration must be specified. It cannot be longer than the time required to complete the task or job identified on the permit.
- re-evaluate the space if permit entrants or their authorized representative requests it

Permit cancellation: The NEW Organic Digestion, LLC Representative shall terminate entry and cancel the permit, completing the Permit Cancellation section, when:

- the entry operations covered by the permit have been completed, or
- a condition that is not allowed under the entry permit arises in or near the permit space.

Debriefing: Post-entry debriefing is encouraged, and in some cases required for all Permit-Required Confined Space entries. This debriefing should include as many entry participants, employee or Contractor, as possible. The debriefing should be documented on the last page of the Work Authorization Permit.

Security: Potential entry points must be covered and secured with danger signs or other equally effective means to inform exposed employees of the existence and location of the danger posed by the permit space.

Records: Send the completed permit to the Safety Manager for retention for annual PRCS entry review. Permit-Required Confined Space (PRCS) entries must be performed following all procedures required by this section and in accordance with the OSHA standard found at 29 CFR 1910.146.

Proper completion of the Work Authorization Permit will meet all of the following PRCS safe entry requirements:

- Specifying acceptable entry conditions
- Isolating the permit space
- Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards
- Providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards
- Verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry
- Authorized Entrants within the permit space by name, to enable the Attendant to determine quickly and accurately which Authorized Entrants are inside the permit space.
- Personnel, by name, currently serving as Attendants
- The individual, by name, currently serving as Entry Supervisor, along with the signature or initials of the Entry Supervisor who originally authorized entry. Unless otherwise specified on the permit, the NEW Organic Digestion, LLC Representative is the Entry Supervisor.

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- The hazards of the permit space to be entered
- Measures used to isolate the permit space and to eliminate or control permit space hazards before entry
- Results of initial and periodic atmospheric monitoring, accompanied by the tester's initials and the time at which the tests were performed
- Rescue and emergency services that can be summoned and the means (such as equipment to use and the numbers to call) for summoning these services. In some cases the rescue team will need to be onsite prior to performing the entry
- Equipment, such as personal protective equipment, testing, communications, alarm systems, and rescue equipment, to be provided
- Any other information or permits needed for the job

All equipment and PPE used in a PRCS entry must be maintained properly and in good working order. All exposed personnel shall be trained in the proper use of all required equipment and PPE. All equipment and PPE must meet or exceed the classification rating of the area where the work will be performed.

PRCS entries require personnel to be designated in the following active roles:

- Authorized Entrants
- Attendants
- Entry Supervisor
- Rescue Team

Authorized Entrant

Only personnel who have been properly trained are authorized to enter permit spaces. (authorized entrants) are assigned specific duties and responsibilities that they must perform when they work in the permit space. Their duties and responsibilities include:

- Know the hazards that may be faced during the entry.
- Properly use required equipment.
- Communicate with attendant.
- Alert the attendant whenever:
 - The entrant recognizes any warning signs or systems of exposure
 - The entrant detects a prohibited condition
- Exits from the permit required confined space as quickly as possible whenever:
 - An order to evacuate is given
 - The entrant recognized any warning sign or system of exposure
 - The entrant detects a prohibited condition
 - An evacuation alarm is activated

The elements covered in the training program for authorized entrants include:

- proper selection and use of PPE
- proper selection and use of safety and monitoring equipment

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- definition of permit required confined space
- completion of Work Authorization Permits
- duties of authorized entrants, attendants and entry supervisors
- communication methods
- job planning
- hazards associated with permit spaces
- role of rescue and non-entry personnel

ENTRY SUPERVISORS

Only personnel who have been properly trained may be act as designated permit space entry supervisors. They are assigned specific duties and responsibilities that they must perform when they work on permit space jobs. Their duties and responsibilities include:

- Know the hazards that may be faced during entry
- 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 if permit conditions are not met
- Verifies that rescue services are available and that the means for summoning them are available
- Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations
- Determines that entry procedures remain consistent with the terms of the entry permit and that acceptable entry conditions are maintained

The elements covered in the training program for PRCS Entry Supervisor are the same elements as listed for the authorized entrant responsibilities

Note: An entry Supervisor may also serve as an attendant or an authorized entrant if the entry Supervisor has been trained and properly equipped to perform the duties of each role.

Only personnel who have been properly trained may be act as designated permit space entry supervisors. They are assigned specific duties and responsibilities that they must perform when they work on permit space jobs. Their duties and responsibilities include:

- Know the hazards that may be faced during entry
- 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 if permit conditions are not met
- Verifies that rescue services are available and that the means for summoning them are available
- Removes unauthorized individuals who enter or who attempt to enter the permit space during entry

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operations

- Determines that entry procedures remain consistent with the terms of the entry permit and that acceptable entry conditions are maintained

The elements covered in the training program for PRCS Entry Supervisor are the same elements as listed for the authorized entrant responsibilities

Note: An entry Supervisor may also serve as an attendant or an authorized entrant if the entry Supervisor has been trained and properly equipped to perform the duties of each role.

RESCUE TEAM

Entry Rescue: PRCS entries require the development and implementation of procedures for:

- summoning rescue and emergency services,
- rescuing entrants from permit spaces,
- providing necessary emergency services to rescued personnel, and
- preventing unauthorized personnel from attempting a rescue.

Rescue service must be available for each PRCS entry. This service may be provided internally or externally. The rescue team must be close enough to respond promptly to reasonable, expected emergencies. Some particularly hazardous entries might require the rescue team to be on site. Each rescue team member must be provided with and trained to use the personal protective equipment and needed rescue equipment.

- Each member must receive training required of Authorized Entrants.
- Each member must be trained in basic first aid and CPR. At least one member must be currently certified.
- Each member must practice simulated PRCS rescues, at least once every 12-months using dummies or actual persons. Practices must be actual or representative of PRCS to closely simulate the types of permit spaces from which rescue is to be performed.

Non-Entry Rescue: Provide for non-entry retrieval and rescue unless this retrieval would increase risk to entrants or would not help in the rescue. The retrieval system includes a chest or full body harness with a retrieval line attached, or able to be attached remotely, at the center of the person's back near shoulder level or above the head. The other end of the line must be attached to a mechanical device or fixed point outside the space to help ensure a fast response. To retrieve victims from a vertical permit space deeper than 5 feet, use a mechanical lifting device.

Note: Wristlets may be used instead of a harness if using the harness is not possible or is hazardous, and if the use of wristlets is the safest and most effective alternative. Justification for this choice must be documented on the Work Authorization Permit.

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When the confined space meets the PRCS Alternate Entry definition, a simplified set of procedures may be used. A Work Authorization Permit is required to perform this type of confined space entry. Entry under this type of PRCS classification allows entry without the use of authorized entrants, attendants and rescue teams. All PRCS Alternate entries must fulfill all confined space general requirement conditions referenced in this section and must be in accordance with 29 CFR 1910.146, as applicable

RE-CLASSIFICATION

The entry supervisor must develop monitoring and inspection data to support the re-classification of any PRCS to a PRCS Alternate Entry classification. Prior to entry, data must be collected and documented on the Work Authorization Permit to demonstrate that there are no non-atmospheric hazards and that the ventilation will keep the air inside the permit space safe for entry. This should include initial data in the form of:

- Volume of the space to be entered; (equation for calculating cylindrical tank volume) $V = \pi \times r^2 \times h$

Example: Tank 20ft radius-30ft height

$$V = 3.1416 \times 20^2 \times 30$$

$$V = 3.1416 \times 20 \times 20 \times 30$$

$$V = 37699.2 \text{ cubic feet}$$

- Capacity and configuration of the ventilation equipment used;
- Identified atmospheric hazards and potential hazards; sampling results from routine testing of the space from the time ventilating has begun through final determination of acceptable entry conditions; and
- Atmospheric hazards created by work in the space

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Note: Wristlets may be used instead of a harness if using the harness is not possible or is hazardous, and if the use of wristlets is the safest and most effective alternative. Justification for this choice must be documented on the Work Authorization Permit.

When the confined space meets the PRCS Alternate Entry definition, a simplified set of procedures may be used. A Work Authorization Permit is required to perform this type of confined space entry. Entry under this type of PRCS classification allows entry without the use of authorized entrants, attendants and rescue teams. All PRCS Alternate entries must fulfill all confined space general requirement conditions referenced in this section and must be in accordance with 29 CFR 1910.146, as applicable.

CONTINUOUS FORCED-AIR VENTILATION

Entries into PRCS Alternate Entry confined spaces require continuous forced-air ventilation, which must be used as follows:

1. No one may enter the space until ventilation has eliminated the hazardous atmosphere; if entry is needed to verify this, it must be conducted according to full PRCS procedures.
2. Ventilation shall be so directed as to ventilate the immediate areas where personnel are or will be present within the space and shall continue until all personnel have left the space.
3. The ventilation air supply shall be from a clean source and may not increase the hazards posed by the space.
4. The equipment used for ventilation shall be grounded or bonded and classified for the type of area.

Note: The atmosphere must be periodically tested to ensure the continuous forced-air ventilation is preventing the accumulation of a hazardous atmosphere. In most cases continuous monitoring will be necessary.

ATMOSPHERIC MONITORING

Atmospheric testing of confined spaces is required to evaluate the hazards of the Confined Space and verify that acceptable entry conditions within the confined space exist. Prior to any entry, the atmosphere of a confined space must be analyzed using equipment of sufficient sensitivity and specificity to identify and evaluate any hazardous atmospheres that may exist or arise. At a minimum, the internal atmosphere will be tested, with a calibrated direct reading instrument, for the following in this order:

- Oxygen – O₂ (19.5% - 23.5%)
- Flammable Gas – LEL (< 10% LEL)
- Hydrogen Sulfide – H₂S (< 10 PPM)
- Carbon Monoxide – CO (<35 PPM) Light Hydrocarbon Vapors (<300)

Atmospheric concentrations listed are the PEL or TLV-TWA for that substance. Any PRCS with higher levels than those listed above will require additional approval from the appropriate manager prior to entry.

Whenever work needs to be performed within a permit space that exceeds the allowable limits listed above, the Safety Manager must first be contacted prior to making the entry. Entry under some circumstances may not be possible until all other options have been considered. Entries into permit spaces with IDLH atmospheres or other

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safety hazards that could affect the entrant's ability to self-escape should be avoided and as a rule, is not a common practice at NEW Organic Digestion, LLC. Any atmospheric testing that is performed, as a condition of entry of either a PRCS or a PRCS Alternate Entry, must be documented on a Work Authorization Permit prior to making entry into the space and while performing the work within the permit space.

Note: All atmospheric monitoring must be performed by using a calibrated direct reading instrument.

NON-PERMIT CONFINED SPACES (RE-CLASSIFIED)

- Entry into any non-permit confined space that was formerly identified, as a PRCS must be performed with great caution. All entrants must take the necessary precautions to ensure there are neither hazards nor any potential hazards present in the space that would subject them or any other personnel to a hazard.
-
- Like any confined space, the atmosphere within the space needs to be checked prior to entering the space. If a hazardous atmosphere is found during the initial check, the space will have to be re-classified to a PRCS Alternate Entry Space or a PRCS whichever fits the type of hazard encountered and type of entry that needs to be performed.

CONFINED SPACES

- Before entry into any confined space, the atmosphere must be checked with a direct reading instrument. The readings do not need to be documented nor does a Work Authorization Permit need to be filled out as long as the readings were within the acceptable limits for safe entry. If a hazardous atmosphere is encountered, exit the space and notify the Division Safety Manager immediately. The space may need to be re-classified and worked as a permit space.

ENTRY PROCEDURES FOR PREDETERMINED CONFINED SPACES

Special procedures below may be employed if the procedure for entry into certain types of confined space can be verified to be safe for use in the particular space to be entered.

Safe Entry into water service Valve Boxes/Vaults: Valve boxes more than five feet deep are considered a confined space. Entry into a valve box does not require a Work Authorization Permit unless the pre-hazard assessment (see below) shows that the space contains a hazard.

Communication: Entrant must inform another employee of entry prior to entering and after exiting from the valve box space.

Hazard assessment prior to descent:

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- Make an inspection from outside of the valve box for hazards posed by the space, such as visible product, vapor, snakes or insects, ladder defects, etc.
- Determine if hazardous atmosphere exists. Previous and documented IH monitoring might eliminate the need for testing for certain atmospheres such as one containing benzene
- Atmospheric Monitoring prior to and during entry must be provided.

Detection of hazards: If conditions in the space change from those identified in the hazard assessment, stop all work immediately and exit the space.

External Floating Roof Tanks: External floating roof tanks are considered to be confined spaces. Descent onto external floating roofs for certain activities does not require a Work Authorization Permit unless the pre-hazard hazard assessment (see below) shows that the space contains a hazard.

Examples of activities that may not require a permit are as follows:

- gauging activities
- seal inspection, or
- draining of rainwater.

Communication: Entrant must inform another employee of entry prior to descending onto the roof and after exiting from the roof.

Hazard assessment prior to descent:

- Make an inspection from the platform on top of the tank to determine the physical condition of the stairs and roof, and check for product on top of the floating roof, threatening weather conditions or for any other potentially serious hazard.
- Determine if hazardous atmosphere exists. Previous and documented IH monitoring might eliminate the need for testing for certain atmospheres, such as one containing benzene.
- Verify that the tank is not being operated, valves are closed, mixers turned off, equipment locked out and tank is in static condition during descent. Under no circumstances shall an entrant descend to the roof while a tank is being filled.

Atmospheric Monitoring during descent and work: A responsible person must conduct continuous monitoring of the area. A "Responsible Person" is anyone who would be required to go down onto external floating roofs and has been properly trained in atmospheric monitoring.

Detection of hazards: If conditions do not meet the criteria of the hazard assessment above or if conditions in the space change from those identified in the hazard assessment, stop all work immediately and exit the space. If such hazards cannot be eliminated or controlled, the entry must be conducted according to full PRCS entry procedures.

Note: Some tanks may be PRCS due to the hazards of the product in them; e.g. high concentration of H₂S. In these circumstances the tanks should be identified as PRCS and posted with the appropriate signage.

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Internal Floating Roof Tanks: Descent onto internal floating roofs or covered open-top floating roofs of storage tanks constitutes permit-required confined space entry (PRCS) and all associated safety requirements must be met prior to entry, during entry and after entry. A Work Authorization Permit must be used when making an entry onto the roof of an internal floating roof tank. Entry under PRCS Alternate Entry procedures is not permitted.

Truck Tanks: Descent into truck tanks constitutes a permit-required confined space entry (PRCS) and all associated safety requirements must be met prior to entry, during entry and after entry. As a rule, NEW Organic Digestion, LLC’s personnel should never have to enter a truck tank for any reason. If an entry into the tank could not be outsourced to a third party contractor, then the NEW Organic Digestion, LLC associate performing the entry would have to follow the procedures for entering a PRCS as previously described in this section. A Work Authorization Permit must be used when making an entry into a truck tank. Entry under PRCS Alternate Entry procedures is permitted as long as a hazard assessment has been performed and the tank has been cleaned prior to making the entry and it has been determined that it is safe to do so. Any entry into a tank for cleaning purposes to re-classify the space to an Alternate Entry Confined Space would need to be performed under the PRCS procedures.

Excavations: Excavations are handled on a case-by-case basis by applying the definitions of what constitutes a Permit Required Confined Space, PRCS Alternate Entry, Non-Permit and a Confined Space. Each excavation has its own unique identity and it can only be determined locally at the excavation site by a competent person trained in hazard recognition within confined spaces in regards to excavations. Work of this nature typically requires the use of a Work Authorization Permit.

WORKING WITH CONTRACTORS

When multiple employers are hired to work in PRCS or PRCS Alternate Entry confined spaces, both the NEW Organic Digestion, LLC and the employers shall, as applicable take the following actions:

NEW Organic Digestion, LLC’s Responsibilities:

- Inform the Contractor that the work place has permit spaces and that they must comply with a permit space program that meets the requirements of the OSHA Standard 29 CFR 1910.146.
- Apprise the Contractor of the elements that make the space a permit space, including notifying the Contractor of the elements and hazards and NEW Organic Digestion, LLC experiences with the space.
- Inform the Contractor of any precautions or procedures used to protect all personnel who work in or near the permit space where Contract personnel will be working.
- Coordinate entry operations with Contractor when NEW Organic Digestion, LLC and Contract personnel will be working in or near permit spaces.
- At the end of the entry operations, conduct a debriefing session with the Contractor to discuss the permit space program followed and hazards confronted or created during entry operations.

Multi-Employers Responsibilities:

- Obtain any available information about the permit-required space hazards and entry operations from NEW

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- Coordinate entry operations with NEW Organic Digestion, LLC when both NEW Organic Digestion, LLC and Contract personnel will be working in or near a permit-required space.
- Inform NEW Organic Digestion, LLC of the permit space program that will be followed.
- Notify NEW Organic Digestion, LLC of any hazards confronted or created in permit spaces. This should be done during entry or in a debriefing session.
- Documents the permit space entry either on a NEW Organic Digestion, LLC Work Authorization Permit or a comparable Permit that the Contractor typically uses to document permit entries.
- Perform all work at NEW Organic Digestion, LLC facilities in a safe, responsible and professional manner.

TRAINING

All NEW Organic Digestion, LLC personnel whose work involves entry into a permit required confined spaces receives training to acquire the understanding, knowledge, and skills necessary for the safe performance of their confined space duties prior to making and entries.

Training is provided to each affected employee:

- before the employee is first assigned confined space duties in this section
- before there is a change in assigned duties
- whenever there is a change in permit space operations that presents a hazard not previously covered in the employee's training, and
- whenever there is reason to believe that there are deviations from the permit space entry procedures or that there are gaps in the employee's knowledge or use of these procedures

Note: All personnel receive Confined Space Awareness. **Not all personnel** receive training in actual permit required confined space entry procedures.

The training provides all affected personnel proficiency in their duties required by 29 CFR 1910.146 and introduces new or revised procedures as necessary. Training is conducted via Computer Based Training (CBT), instructor led, video, and hands on experiences. A completed class roster that contains the employee's name, the signatures or initials of the trainers, and the dates of training must accompany instructor led training. CBT training results are recorded electronically under the specific name of the individual that took to course. In both cases, the training records are recorded and all of the supporting documents are kept on file.

Constant awareness of and respect of permit-required confined space entry hazards, and compliance with all safety rules are considered conditions of employment. Management reserves the right to issue disciplinary warnings to all personnel, up to and including termination, for failure to follow the guidelines of this permit entry program

OTHER REQUIREMENTS

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- Any insubordination in regards to this will be dealt with as per NEW Organic Digestion, LLC's Disciplinary Program.