



# CONFINED SPACE ENTRY

Limited-Entry Program for Water Tankers and Unexpected Spaces

## DEFAULT RULE - NO ENTRY

Pheifer Brothers does not routinely perform confined-space entry. Water tankers and other spaces are cleaned, inspected and serviced from outside whenever possible. No employee may enter unless management authorizes a site-specific entry under this program.

## PHEIFER BROTHERS CONSTRUCTION CO., INC.

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## LIMITED-ENTRY PROGRAM

This policy permits entry only after a competent-person evaluation and management authorization. If the company cannot provide trained roles, calibrated monitoring, isolation, retrieval and a verified rescue service, a qualified confined-space contractor must perform the work.

## Primary Regulatory References

- 29 CFR 1926 Subpart AA - Confined Spaces in Construction
- 1926.1203 - General requirements and coordination
- 1926.1204 through 1926.1210 - Permit program, permit and entry roles
- 1926.1211 - Rescue and emergency services

# 1. Purpose, Scope and Responsibilities

## Purpose and Scope

This policy applies when Pheifer Brothers employees could bodily enter a confined space during construction work. The company-owned water tanker is the primary known example. It also applies to unexpected tanks, vessels, vaults, pits, manholes, sewers, caissons, process spaces or similar areas encountered at a project.

## Company Approach

- Avoid entry through remote cameras, exterior wash systems, clean-out ports, long-handled tools or specialty contractors.
- Treat the tanker as a potential permit-required confined space until a competent person evaluates the actual configuration, contents, cleaning chemicals, isolation and atmosphere.
- No routine employee entry is authorized by this policy alone. Each entry requires written classification and the applicable permit/certification.
- No employee enters a sewer, unknown tank, process vessel or space with uncontrolled engulfment, configuration or atmospheric hazards without a specifically developed program and rescue capability.

## Responsibilities

- Management authorizes entry, designates a competent person/entry supervisor, supplies resources and approves the rescue service.
- The competent person identifies/classifies spaces, evaluates hazards and has authority to prevent or stop entry.
- The entry supervisor verifies the permit, conditions, personnel, equipment and rescue arrangements; cancels entry when complete or unsafe.
- Authorized entrants and attendants perform only their trained duties. Employees prevent unauthorized entry and report unknown spaces.

### ENTRY BEGINS AT THE OPENING

Entry occurs when any part of the body breaks the plane of an opening into the space. Reaching the head or arm through a tanker hatch can constitute entry.

## 2. Space Identification and Classification

### Confined Space

- Large enough and configured so an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit; and
- Is not designed for continuous employee occupancy.

### Permit-Required Confined Space

- Contains or could contain a hazardous atmosphere;
- Contains material that could engulf an entrant;
- Has inwardly converging walls or a sloped floor tapering to a smaller cross-section that could trap/asphyxiate; or
- Contains another recognized serious safety or health hazard, such as mechanical, electrical, chemical, heat, fall, slip or restricted-rescue hazard.

### Competent-Person Evaluation

- Before work, identify all confined spaces employees may enter and determine which are permit spaces, including testing as necessary.
- Document the water tanker configuration, openings, prior/current contents, coatings/residue, cleaning agents, pumps/valves/lines and access/rescue limitations.
- Reevaluate after changes in use, contents, chemicals, configuration, equipment or other indication the original evaluation is inadequate.

### Identification and Prevention

- Mark known permit spaces: DANGER - PERMIT-REQUIRED CONFINED SPACE - DO NOT ENTER, or equally effective language.
- Lock/secure hatches where practical and inform exposed employees and the controlling contractor of location and danger.
- If entry is not authorized, use effective measures beyond signs to prevent employee entry.

#### **DO NOT SELF-CLASSIFY**

An employee or foreman may not decide that a tank is safe because it held water, looks clean or has an open hatch.

## 3. Water Tanker Requirements

### Preferred No-Entry Methods

- Drain, flush and clean through exterior ports, spray balls, recirculation, vacuum recovery or long-handled equipment.
- Inspect with exterior lighting, mirrors, cameras or borescopes.
- Use a qualified tank-cleaning/confined-space contractor when interior access is necessary and company capability is insufficient.

### Water Tanker Hazards

- Oxygen deficiency or hazardous atmosphere from residue, corrosion, cleaning/disinfection chemicals, fuel/exhaust, welding/hot work or microbial activity.
- Unexpected inflow/engulfment from fill, discharge, recirculation or connected lines; pump/agitator/mechanical energy.
- Slippery curved surfaces, restricted hatch, awkward climbing, heat/cold, poor visibility and difficult rescue.
- Chemical burns or incompatible cleaning products. Never mix bleach/chlorine products with acids or ammonia.
- Vehicle movement, traffic, elevated hatch access, falls into the opening and objects entering the tank.

### Minimum Isolation Before Any Entry

- Park on firm level ground away from traffic/exhaust; set brake, chock wheels, remove/secure ignition key and barricade work area.
- Drain completely. Disconnect, blank/blind, block or use an equivalent positive isolation method for every line capable of introducing material or hazardous energy.
- Lockout/tagout pumps, valves, PTO, recirculation, agitation, electrical and other energy sources; verify zero energy.
- Open/guard access only after pressure or other conditions making cover removal unsafe are eliminated.
- Do not rely on a closed valve, vehicle switch or verbal instruction as sole isolation.

#### **TANKER ENTRY REQUIRES MANAGEMENT APPROVAL**

The foreman contacts management before planning entry. If a compliant rescue plan and trained team are not available, employees remain outside.

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## 4. Permit-Space Planning and Hazard Control

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### Before Permit Entry

- Identify purpose/scope, entrants, attendant, entry supervisor, competent person and rescue service.
- Identify actual/potential atmospheric, chemical, mechanical, engulfment, electrical, heat, fall, access and external hazards.
- Specify acceptable entry conditions and methods to isolate, purge, flush and ventilate.
- Provide calibrated monitoring, ventilation, communication, lighting, barriers, access/egress, PPE and rescue/retrieval equipment at no cost.
- Coordinate hot work, chemical cleaning, lockout/tagout, fall protection, respiratory protection and traffic control.

### Isolation and External Protection

- Eliminate or isolate physical hazards before entry whenever possible.
- Guard an open hatch immediately with railing, temporary cover or barrier protecting against falls and falling objects.
- Use vehicle/pedestrian barriers and prevent unauthorized operation or movement.
- Keep engine exhaust, generator exhaust and ventilation intake separated; use a clean air source.

### Acceptable Entry Conditions

- Defined on the permit from hazard assessment, SDSs and applicable exposure limits.
- Typical atmospheric limits include oxygen 19.5-23.5 percent and flammable atmosphere below 10 percent LFL; toxic limits are contaminant-specific and may need more protective thresholds.
- No uncontrolled engulfment, configuration or mechanical/electrical hazard; safe access and rescue maintained.
- Conditions remain acceptable for the entire entry, not only at permit signing.

### Prohibited Conditions

- Do not use pure oxygen for ventilation.
- Do not enter an unknown, oxygen-deficient or IDLH atmosphere under this limited tanker program.
- Do not perform entry rescue unless a separately trained/equipped rescue team is designated and prepared.

## 5. Atmospheric Testing and Ventilation

### Monitoring Equipment

- Use a calibrated direct-reading instrument appropriate for oxygen, combustible gases/vapors and identified toxic contaminants.
- Perform manufacturer-required calibration and pre-use bump/function checks; only trained employees operate instruments.
- A basic four-gas meter does not detect every cleaning chemical, vapor or coating hazard. Select sensors from the hazard assessment.

### Test in Required Order

- First oxygen; then combustible gases/vapors; then potential toxic gases/vapors.
- Sample remotely before entry and at top, middle, bottom and potential dead zones because atmospheres can stratify.
- Test before changing natural ventilation when required, then verify after ventilation and before authorization.
- Provide entrants/representatives the opportunity to observe testing and immediately provide results.

### Continuous Monitoring

- Continuously monitor atmospheric hazards during permit entry unless the narrow OSHA exception for unavailable equipment or demonstrably sufficient periodic monitoring applies.
- Position monitor in the entrant's breathing/work area and use alarms that provide time to exit.
- Continuously ventilate to the immediate occupied areas using clean air; continue until all entrants exit.
- If ventilation stops, alarm sounds or conditions deviate, entrants exit immediately and the space is reevaluated before reentry.

### Typical Alarm/Stop Conditions

| HAZARD                  | STOP / EXIT CONDITION                                                                    |
|-------------------------|------------------------------------------------------------------------------------------|
| Oxygen                  | Below 19.5% or above 23.5%.                                                              |
| Flammables              | At or above 10% LFL, or a lower permit/equipment threshold.                              |
| Toxic contaminant       | At/above the permit limit, OSHA limit or instrument alarm, whichever is more protective. |
| Unknown/monitor failure | Immediate exit; do not rely on odor or appearance.                                       |

## 6. Entry Permit and Entry Roles

### Entry Permit

- Identify space, purpose, date/duration, entrants, attendant, entry supervisor, hazards, isolation, acceptable conditions, test results/times/initials, rescue service/contact method, communications and equipment.
- Entry supervisor signs before entry and posts/makes permit available at the entry point.
- Cancel when work is complete or prohibited/unexpected condition occurs. Document problems and retain canceled permits at least one year for program review.

### Authorized Entrants

- Know hazards, signs/symptoms and consequences; properly use monitoring, PPE, retrieval and communication equipment.
- Communicate with attendant and alert immediately for warning signs, prohibited conditions or evacuation need.
- Exit immediately when ordered, when alarm/warning sign occurs, or when prohibited condition is detected.

### Attendant

- Remain outside for the entire entry; maintain accurate entrant count and communication; monitor inside/outside conditions.
- Order evacuation, summon rescue/emergency services and prevent unauthorized entry.
- Perform no duty that interferes with attendant responsibilities.
- Never enter to attempt rescue unless formally relieved and authorized, trained and equipped as a rescue entrant under a compliant rescue plan.

### Entry Supervisor

- Verify permit tests, controls, equipment, trained roles and rescue availability before signing.
- Confirm rescue service is available and means for summoning works.
- Remove unauthorized persons; terminate/cancel entry as required and transfer responsibility through a documented handoff if supervisors change.

#### THE ATTENDANT DOES NOT GO IN

Calling 911 and then entering the tanker is prohibited. The attendant stays outside, summons the planned rescue service and operates non-entry retrieval when trained to do so.

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## 7. Rescue and Emergency Response

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### Rescue Must Be Planned Before Entry

- Select a rescue service capable of reaching victims in time based on tanker hazards, restricted opening and potential asphyxiation.
- Evaluate the service's response capability, equipment and proficiency; provide access to the tanker or a representative space for practice.
- Confirm availability for the specific date/location and reliable summoning method. Calling 911 alone is not proof of timely confined-space rescue.
- Provide the service the identified hazards and access information.

### Non-Entry Retrieval

- Use retrieval systems unless they increase overall risk or would not contribute to rescue.
- Each entrant uses a chest/full-body harness with retrieval line attached at center back near shoulder level, above head or another point presenting a profile small enough for removal.
- For vertical permit spaces more than 5 feet deep, provide a mechanical retrieval device.
- Anchor/tripod/davit and winch must be rated/configured for personnel and allow retrieval through the actual hatch without obstruction.

### Entry Rescue

- Only a designated rescue team trained in personal protective/rescue equipment, entrant duties, CPR/first aid and simulated rescue at least every 12 months may conduct entry rescue.
- Respiratory hazards may require supplied-air/SCBA under the Respiratory Protection Program. No improvised rescue with an air-purifying respirator.
- An attendant is not automatically a rescue entrant.

### Emergency Actions

- Entrants exit on alarm, symptoms, communication loss, ventilation/monitor failure, outside hazard or attendant/supervisor order.
- Attendant calls the planned rescue/EMS resources, maintains control and performs trained non-entry retrieval when safe.
- Provide first aid/EMS after retrieval; preserve permit/monitor data and report the incident/near miss.

## 8. Alternate Procedures and Reclassification

### Alternate Atmospheric Procedures

- May be used only when all physical hazards are eliminated or isolated, the only hazard is an actual/potential atmosphere, and documented monitoring data show continuous forced-air ventilation alone is sufficient and entrants can exit safely if it fails.
- Initial data-gathering entry must use the full permit program when entry is needed to obtain supporting data.
- Guard opening; test in required order; eliminate hazardous atmosphere before entry; continuously ventilate; continuously monitor unless OSHA's limited exception applies; provide safe access.
- Create a written certification with date, location and signature before entry. Exit/reassess immediately if a hazard develops.

### Reclassification to Non-Permit

- Allowed only when no actual/potential atmospheric hazard exists and all other hazards are eliminated or isolated.
- Ventilation controls an atmospheric hazard; it does not eliminate or isolate it and therefore does not support reclassification.
- Eliminate/isolate hazards without entry when possible. Any entry needed to do so uses the full permit program.
- Competent person documents date, location, basis and signature and makes certification available to entrants.
- If any hazard arises, entrants exit and the space is reevaluated/reclassified.

### Company Restriction

- Alternate procedures or reclassification are not used merely because a tanker held potable water or entry is brief.
- Management and the competent person must approve documented use before entry.
- When supporting data or isolation is uncertain, use the full permit program or a qualified contractor.

**VENTILATED  
DOES NOT MEAN  
NON-PERMIT**

If ventilation is needed to control a potential hazardous atmosphere, use qualifying alternate procedures or the full permit program - not informal entry.

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## 9. Coordination, Training, Records and Stop Work

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### Multi-Employer Coordination

- Obtain permit-space locations, hazards and prior precautions from the host/controlling contractor before entry.
- Inform the controlling contractor of the entry program and hazards the work may create.
- Coordinate simultaneous entries and nearby work that could introduce exhaust, energy, material or other hazards.
- After entry, debrief the controlling contractor about the program and hazards encountered/created.

### Training

- Train employees before assigned permit duties, before changed duties/operations create new hazards, and whenever deficiencies appear.
- Training must establish understanding and skill for assigned entrant, attendant, entry-supervisor, monitor/ventilation, retrieval and rescue duties.
- Document employee name, trainer and training date. Toolbox talks do not replace required confined-space training.

### Records and Review

- Maintain space evaluations/inventory, classifications, permits/certifications, monitoring/calibration, LOTO, rescue-service evaluations, training and incident/corrective-action records.
- Review canceled permits within one year and revise the program for unauthorized entry, unexpected hazards, permit deviations, complaints or ineffective procedures.
- Review the program at least annually under company document-control practice and before any new type of entry.

### Stop-Work Triggers

- No management authorization, competent-person classification, permit/certification, trained role, calibrated monitor, isolation or rescue plan.
- Unexpected residue/chemical, atmospheric alarm, failed ventilation/communication/retrieval, unauthorized entry, changing outside work, illness/symptoms or condition outside permit limits.
- Any employee may stop entry. Only the entry supervisor may authorize restart after reevaluation/correction and a new or revalidated permit process.

## 10. Water Tanker Entry Checklist

This checklist supports planning; it is not an entry permit. If any item cannot be verified, do not enter.

| VERIFY            | MINIMUM EXPECTATION                                                                              |
|-------------------|--------------------------------------------------------------------------------------------------|
| Entry avoidance   | Exterior cleaning/inspection or qualified contractor considered first.                           |
| Authorization     | Management approval; competent person and entry supervisor designated.                           |
| Classification    | Tanker evaluated; permit/alternate/reclassification basis documented.                            |
| Vehicle isolation | Level ground, brake, wheel chocks, keys controlled, traffic barrier.                             |
| Process isolation | Drained; lines positively isolated; pump/PTO/valves/electric LOTO verified.                      |
| Hazards           | Prior contents, residues, chemicals, atmosphere, slip/heat/access evaluated.                     |
| Atmosphere        | Calibrated monitor; O <sub>2</sub> , LFL, toxics in order; stratified sampling; continuous plan. |
| Ventilation       | Clean source, directed to entrant, continuous; exhaust separated.                                |
| Entry team        | Trained entrants, dedicated attendant, entry supervisor; communication tested.                   |
| Rescue            | Evaluated/available rescue service; summons tested; retrieval rigged and unobstructed.           |
| Equipment         | Guard, access, lighting, PPE, harness/line, first aid and emergency controls.                    |
| Permit            | Complete, signed, posted and time-limited; stop conditions reviewed.                             |

### FINAL GO / NO-GO

The entry supervisor personally verifies acceptable conditions, rescue availability and completed isolation immediately before signing. Entry stops when the permit expires or any condition changes.

# 11. Test Your Knowledge

Circle the best answer. Review missed questions with your foreman before any confined-space work.

|                                                                                                                                                                                 |                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. What is the normal company approach to tanker interior work?</p> <p>A. Enter briefly</p> <p>B. Avoid entry and work from outside</p> <p>C. Send the smallest employee</p> | <p>2. When does entry begin?</p> <p>A. When any body part breaks the opening plane</p> <p>B. Only when both feet enter</p> <p>C. After five minutes</p> |
| <p>3. Who classifies a confined space?</p> <p>A. Any entrant</p> <p>B. The driver</p> <p>C. A competent person</p>                                                              | <p>4. What is the atmospheric testing order?</p> <p>A. Toxic, LFL, oxygen</p> <p>B. Oxygen, combustibles, toxics</p> <p>C. Any order</p>                |
| <p>5. What must the attendant do during entry?</p> <p>A. Remain outside and perform attendant duties</p> <p>B. Help inside</p> <p>C. Leave to get tools</p>                     | <p>6. Is calling 911 alone proof of an adequate rescue plan?</p> <p>A. Always</p> <p>B. Yes for water tanks</p> <p>C. No</p>                            |
| <p>7. When is non-entry retrieval required?</p> <p>A. Never</p> <p>B. Unless it increases risk or would not aid rescue</p> <p>C. Only after an incident</p>                     | <p>8. May ventilation alone reclassify a permit space as non-permit?</p> <p>A. No</p> <p>B. Yes</p> <p>C. Only in winter</p>                            |
| <p>9. What occurs when a monitor alarms?</p> <p>A. Silence it</p> <p>B. Finish the task</p> <p>C. Exit immediately and reevaluate</p>                                           | <p>10. Who authorizes permit entry to begin?</p> <p>A. Authorized entrant</p> <p>B. Entry supervisor</p> <p>C. Rescue service</p>                       |

EMPLOYEE: \_\_\_\_\_

DATE: \_\_\_\_\_

ANSWER KEY: 1-B | 2-A | 3-C | 4-B | 5-A | 6-C | 7-B | 8-A | 9-C | 10-B