

Portland Community College Health & Safety Manual

Dept: Environmental Health and Safety

Topic: Chapter 5 — Confined Space Entry & Tunnel Safety Plan

Board Policy: Revised Date: **B507** February 2025

Authority	PCC Board Policy—B507
	Portland Community College is committed to providing a safe and healthy work and educational environment for our employees, students and visitors.

Summary	This Plan incorporates OR-OSHA requirements to protect the health of employees and reduce accidental injuries associated with entering, working in, and exiting from the College's permit-required confined spaces. Additionally, this Plan includes the requirements for safe entry into and work within the utility tunnels located below grade at the Sylvania campus.
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I. PURPOSE

Portland Community College's Confined Space Entry & Tunnel Safety Plan (the Plan) is designed to provide employees with procedures that comply with the Oregon OSHA Confined Space Standard and protect them from hazards associated with confined spaces. The Plan also includes procedures that must be followed by all personnel entering into and working within the utility tunnel system located at the Sylvania campus. This Plan applies to any PCC employee or contractor that must enter into an area identified as, or meeting the definition of, a confined space or the tunnel system.

II. AUTHORITY

PCC Board Policy B507 OR OSHA Div 2/J; 437-002-0146 Confined Spaces

III. RESPONSIBILITY

A. Department Managers:

- Identify employees to be trained and authorized to serve on permit-required confined space entry teams and work within confined spaces;
- Designate members of permit-required confined space entry teams for each entry.
- Evaluate spaces prior to entry and determine space classifications utilizing *Appendix C: Confined Space Indices*;
- Complete Form 1: Confined Space Classification upon discovery or creation of a new confined space or changes are noted in a previously classified space; send copies of each to EH&S;
- Coordinate with local emergency response providers for rescues requiring entry into a permit-required confined space; complete Form 3: Permit-Required Confined Space Rescue Plan for planned entries into such spaces;
- Retain completed, cancelled and expired copies of *Form 2: Confined Space Entry Permit* forms on file for three years; send copies of each to EH&S.

B. Authorized Employees on Confined Space Entry Teams:

- Receive training on confined space hazards, entry procedures, equipment, and nonentry rescue;
- Understanding the procedures and controls outlined in this Plan;
- Fulfilling the duties associated with the role(s) they assume on a permit-required confined space entry team, i.e., Attendant, Entrant, Entry Supervisor as outlined in Section IV. C. Permit-Required Confined Space Entry Team Duties and Appendix D: Entry Team Duties.
- Notifying Public Safety prior to, and upon completion of, a permit-required confined space entry;

C. Project Managers

- Ensuring that Ch 18 Form 1: Contractor Notification Project Hazard Assessment has been reviewed and completed;
- Informing contractors of this Plan and any procedures related to potential entries by contractor personnel into any College permit-required confined spaces; ensuring contractors understand their responsibilities regarding this Plan including notifying Public Safety prior to any permit-required confined space entries;

- Reviewing Appendix C: Confined Space Indices and informing the Contractor of any hazards the College has identified, historical precautions that College employees have taken to enter impacted spaces, and the experiences that College employees have had with such spaces;
- Ensuring Contractors complete *Form 2: Confined Space Entry Permit* for each permit-required confined space entry;
- Coordinating any entry operation with Contractors if PCC employees will also be entering the permit-required confined space;
- Confirming that Contractors are trained in confined space entry requirements per OR-OSHA and ensuring that the Contractor issues their own confined space entry permit;
- Holding a debriefing with Contractors regarding any problems or new hazards encountered in the permit-required confined space entry and documenting this information on Form 2: Confined Space Entry Permit;
- Supplying a copy of the completed *Form 2: Confined Space Entry Permit* to EH&S after completing work in a permit-required confined space.

D. Environmental Health & Safety

- Managing this Plan, including the maintenance of the Appendix C: Confined Space Indices of confined spaces at each campus/center and communicating updates to all affected departments;
- Providing assistance as needed to affected College departments (e.g., Facilities Management Services, Information Technology, Planning & Capital Construction) in evaluating compliance with this Plan;
- Providing training as needed to employees who are identified as authorized entrants, attendants and/or entry supervisors related to permit-required confined space entries:
- Ensuring required maintenance and inspections are done on PCC's permit-required confined space entry equipment, including air monitors, blowers, tripods, and winches;
- Review completed Form 1 and Form 2 documents and update Appendix C as needed;
- Performing periodic reviews of this Plan to ensure that affected departments have properly issued permits, made contractor notifications, and are following the procedure laid out in this Plan.

E. Facilities Management Services

- Providing and maintaining maps of confined space locations at PCC that graphically depict the locations of confined spaces indicated in *Appendix C: Confined Space Indices:*
- Providing and maintaining a detailed map of the Sylvania campus tunnel system, including emergency evacuation routes and exits.

F. Department of Public Safety

- Receiving calls from entry team members prior to, and upon completion of, a
 permit-required confined space entry, or any time an evacuation from a permitrequired confined space is called;
- Responding to a location and providing initial care to impacted team members outside of a space whenever there is a medical emergency;

• Directing entry rescue services/providers to the site of any permit-required confined space where an entry rescue is needed.

IV.PROCEDURES

Procedures to be followed for entry into a confined space are dependent upon the evaluation and classification of the space and the hazards identified and/or anticipated to be present in the space.

A. Identification and Hazards of Confined Spaces

It is imperative that each space an employee will be working in is properly assessed and classified for hazards. PCC's spaces can be classified as either a confined space, a permit-required confined space, or as not a confined space. The steps for evaluating and classifying spaces are listed below as well as in *Appendix B: Space Determination Flowchart*. EH&S is available to assist with such evaluations.

- 1. Determine if the space meets the definitions of a confined space. A confined space is any space that meets <u>all</u> of the following conditions:
 - It is large enough and so configured that a person can fully enter the space and perform work; and,
 - It has limited or restricted means for entry and/or exit; and,
 - It is not designed for continuous human occupancy
- 2. Determine if the confined space meets the definition of a permit-required confined space. A permit-required confined space is a confined space that has one or more of the following characteristics:
 - It contains or has the potential to contain a hazardous atmosphere; and/or,
 - It contains a material that has the potential of engulfing an entrant; and/or,
 - It has an internal configuration such that the entrant could be trapped and/or asphyxiated by inwardly converging walls, or by a floor which slopes downward to a smaller cross-section; and/or,
 - It contains any other recognized serious safety or health hazard

The primary hazard encountered in a permit-required confined space is a hazardous atmosphere. This means an atmosphere which exposes employees to a risk of death, incapacitation, injury or acute illness from one or more of the following causes:

- A flammable gas, vapor or mist in excess of 10 percent of its lower flammable limit;
- An airborne combustible dust at a concentration that obscures vision at a distance of five feet or less;
- An atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- An atmospheric concentration of any substance for which a permissible exposure limit (PEL) exists and could result in employee exposure in excess of its permissible limits;
- Any atmospheric condition recognized as immediately dangerous to life or health.

Examples of other recognized serious safety or health hazard include, but are not limited to, loose rungs on fixed ladders in manholes, slippery surfaces due to liquids in tanks, sloping floors, electrical hazards, noise exposure due to sound reflected off of walls within the space, or hazards associated with the specific work being performed in or near the confined space.

Using Appendix B: Space Determination Flowchart, the evaluator needs to consider if a confined space is a permit-required confined space based on both the hazards inherent to the space as well as hazards introduced to the space. The introduction of chemicals or equipment into such spaces could result in their reclassification and make them subject to the entry requirements of a permit-required confined space depending on the hazards presented by such chemicals or equipment.

Some work tasks occurring in a confined space may require reviews and/or permits associated with other chapters of the *Health & Safety Manual (H&SM)*. Such additional reviews/permits include:

- The written authorization to perform operations that are a source of sparks, flame or excessive heat (e.g., welding, cutting, burning, etc.) These operations may require adherence to H&SM Chapter 16 - Hot Work Plan and the use of Ch 16 Form 1 – Hot Work Permit. For more information, refer to H&SM Chapter 16 -Hot Work Plan.
- The requirement to isolate sources of hazardous energy to prevent the release of such energy and/or material into the confined space. These requirements can be found in H&SM Chapter 10 - Control of Hazardous Energy (Lockout/Tagout).
- 3. Spaces that do not meet the definition of a confined space are not covered by this Plan. Entry into such spaces requires no special controls under this plan. However, EH&S recommends that work in such spaces involving the use of chemicals or equipment should be evaluated using H&SM Ch 1 Form 1: Hazard Assessment.

B. Space Classification and Documentation

PCC maintains an inventory of known confined spaces and permit-required confined spaces at each PCC location.

1. Space Classification Indices:

Inventories of confined spaces and permit-required confined spaces can be found in *Appendix C: Confined Space Indices*. Department managers must use these resources to review spaces and classifications prior to employees entering a confined space.

Departments who work in confined spaces should not rely fully on the information contained in *Appendix C: Confined Space Indices* to identify whether a location qualifies as a confined space or a permit-required confined space as conditions and hazards can change due to modifications, work performed, etc. Any location that is listed as a confined space should be reviewed in the context of the work to be performed to determine if additional hazards could be present that would change the space's classification.

Special note regarding the Sylvania campus' Utility Tunnel System – The overwhelming majority of this system is not identified as a confined space; However, within the Utility Tunnel System, there are confined spaces which can be identified in *Appendix C: Confined Space Indices* for Sylvania.

2. New and Updated Classifications:

If employees will be working in a space that is not listed in *Appendix C: Confined Space Indices*, yet appears to meet the definition of a confined space or a permit-

required confined space, department managers and/or Project Managers must evaluate the space by completing *Form 1: Confined Space Classification*.

Additionally, if at any time an employee experiences conditions different from those indicated in the locations index, department managers and/or Project Managers must complete *Form 1* to determine if reclassification of the space is needed.

Department managers and/or Project Managers must attach the completed *Form 1* to the AiM work order associated with the work performed in the space as well as provide a copy to EH&S so that the corresponding *Appendix C* can be updated.

3. Physical Markings:

All openings to permit-required confined spaces shall be covered to prevent accidental entry and signs/labels/placards shall be prominently posted/affixed that contain wording such as what is shown in the example below:

DANGER PERMIT-REQUIRED CONFINED SPACE DO NOT ENTER

All uncovered openings to permit-required confined spaces must be barricaded and signs will be posted to discourage unauthorized persons from entering.

C. Permit-Required Confined Space Entry Team Duties

Permit-required confined space entries must be conducted by confined space entry teams consisting of employees designated by their management to fulfill the following duties:

- 1. All Members of the Entry Team must know the hazards that may be faced during a permit-required confined space entry, including information on the types of hazards, as well as signs, symptoms, and consequences of exposure to those hazards. They all must wear the appropriate PPE for their role. And they must all effectively communicate with each other throughout the entry process and call for an evacuation as needed. All entry team members have the ability to call for an evacuation.
- 2. Entrants are responsible for safely entering and exiting permit-required confined spaces and conducting work tasks safely. This includes proper use of equipment and hazard controls listed on *Form 2: Confined Space Entry Permit*.
- 3. Attendants are responsible for remaining outside the permit-required confined space at all times without sources of distraction unless relieved by another designated Attendant. Attendants must also monitor inside and outside of the permit-required confined space for any hazards that could impact the work. Attendants must summon rescue and emergency services when necessary as well as perform nonentry rescues if needed.
- 4. Entry Supervisors are responsible for completing *Form 2: Confined Space Entry Permit* including identifying hazards and controls, informing other team members of those hazards and controls, and ensuring procedures and equipment are in place before allowing entry. Entry Supervisors must review the rescue plan developed by the department manager.

For additional detail and a complete list of each entry team member's duties please review *Appendix D: Entry Team Duties*.

D. Permit-Required Confined Space Entry Procedures

Entry into spaces that are classified as confined spaces but are not classified as permitrequired confined spaces are subject to procedures and hazard controls established by the department manager.

1. Entry Documentation Review

Department managers must review *Appendix C* along with any previously completed copies of *Form 2: Confined Space Entry Permits* to determine what historical conditions were documented for the space. Previously completed permits can be found by searching the AiM work order system for the space to be entered and reviewing attached "Related Documents". All historic conditions must be communicated to the entry team members.

2. Confined Space Entry Equipment

All safety equipment to be used in a permit-required confined space will be inspected, maintained and/or calibrated on a regular basis. Additionally, maintenance manuals will be kept for all specialized equipment used for permit-required confined space entry. These manuals will identify the operational safety requirements and required inspection frequency of each piece of equipment.

The safety equipment includes, but is not limited to:

- Atmospheric meter (used to test and monitor);
- Powered ventilation system;
- Non-entry rescue equipment includes tripod and winch;
- Barriers;
- Communication system;
- Portable ladders:
- PPE identified on *Form 2: Confined Space Entry Permit*, e.g., hard hats, gloves, safety shoes/boots, and safety glasses.

EH&S maintains the atmospheric monitoring device, the powered ventilator, and the non-entry rescue equipment for PCC. Inspection and calibration information for this equipment can be found in *Appendix E: Multi-gas Detector Use & Calibration* and *Appendix F: Tripod Inspection*. Individual departments are responsible for the maintenance of other equipment used by their personnel including, but not limited to, communications equipment, ladders, barriers and PPE.

3. Pre-Entry Procedures

The following procedures must be completed before any permit-required confined space entry:

- Each Entry Team member knows their duties.
- The Entry Supervisor shall assess the possible hazards of the space and work
 processes to determine if acceptable entry conditions are present prior to entry
 into the space, and must complete Form 2: Confined Space Entry Permit prior to
 allowing entry for any permit-required confined space.
- The Entry Team obtains all necessary tools and equipment needed for safe entry and work around the space. This equipment may include atmospheric monitoring

- equipment, ventilation equipment, barricades, and non-entry rescue tripod & winch. Barricades must be highly visible, at least 42 inches tall, and able to withstand 200 pounds of force.
- The Entry Supervisor must contact Public Safety on the non-emergency line (971-722-4902) notifying them of an active permit-required confined space entry.
- All team members shall review *Form 2: Confined Space Entry Permit* before work begins to acknowledge the identified hazards and controls.
- The Attendant shall operate the atmospheric monitoring device and test the permit-required confined space prior to entry, noting the time of the reading. The Attendant shall document such readings on Form 2: Confined Space Entry Permit.
- All hazard controls identified by the Entry Supervisor shall be implemented before any work commences within the permit-required confined space. Hazard controls may include, but are not limited to:
 - Proper ventilation
 - Adequate lighting
 - Rescue procedures are documented
 - An effective means of communication is utilized
 - Using all required personal protective equipment (PPE)
 - Equipment with hazardous energy sources is locked/tagged out
 - o Continuous atmospheric monitoring of the space occurs at various heights
- All persons on the Entry Team must review and sign the completed Form 2:
 Confined Space Entry Permit
- The completed *Form 2: Confined Space Entry Permit* must be conspicuously posted at the entrance to the permit-required confined space.
- 5. Procedures During a Permit-Required Confined Space Entry
 - After initial atmospheric monitoring is completed and documented, the atmospheric monitoring device shall stay with the Attendant outside of the permitrequired confined space so that they can perform continuous air monitoring of the space, documenting the readings and times.
 - Entry into a permit-required confined space shall be limited to the least number of employees required to complete a job.
 - Entries into permit-required confined spaces with a vertical depth of 5 feet or more require that the single entrant wear a fall protection harness and be connected to the non-entry rescue tripod.
 - If an alarm is activated, the monitor malfunctions, ventilation or lighting discontinue or any other emergency condition is detected, all entrants will evacuate the permit-required confined space until the problem is resolved.
 - After the problem has been resolved, the atmosphere in the permit-required confined space will be retested at various heights within the space before any reentry is made.
- 6. Post Entry Procedures
 - After completion of work or end of the work shift, the Entry Supervisor checks with the Attendant and verifies that all Entrants working in the permit-required confined space have exited.
 - The permit-required confined space will be closed and secured as it was before the entry began.

- The completed Form 2: Confined Space Entry Permit will be signed by the Entry Supervisor and a copy delivered to the EH&S office along with the atmospheric monitor.
- The department manager will attach the completed or cancelled entry permit as a "Related Document" to the AiM work order associated with the work conducted in the space.

E. Evacuations and Emergencies

In specific situations, Entrants may be required to evacuate the permit-required confined space. These include but are not limited to:

- Malfunctions of the air blower providing ventilation to the space;
- Any alarm sounds, including the air monitoring device;
- A new unforeseen hazard is introduced into the permit-required confined space or adjacent areas outside the space;
- The Attendant must leave for any reason
- A member of the Entry Team orders an evacuation for any other reason, including if the Attendant is not present.

In the event of any evacuation, the Attendant will:

- Ask all Entrants capable of self-exit to do so;
- Determine if any Entrants are physically incapable of exiting;
- Call the Public Safety Emergency line to alert them of conditions in the space;
- Contacting the rescue service provider, if needed;
- Follow additional procedures outlined in Section IV. F. and H. of this program.

Additionally, if an Entrant is observed showing signs or symptoms of exposure to a hazardous atmosphere, or is having a medical emergency, all Entrants are required to evacuate the space. In situations where there is a medical emergency, Public Safety will respond to the location and provide initial care to impacted team members outside of the space.

Entry Supervisors must respond onsite to any evacuation to reassess hazards and implement controls prior to allowing re-entry into the space.

In the event that an Entrant cannot exit the space on their own (self-rescue), a rescue must be initiated.

F. Rescue

Prior to any employee entering a permit-required confined space, the department manager must develop a plan for rescuing any employee that cannot evacuate a permit-required confined space on their own. Department managers must complete *Form 3:* Permit Required Confined Space Rescue Plan, completing each applicable section based on the rescue type needed.

In section 1 of the Rescue Plan, department managers should provide information about:

- How rescue and emergency medical services will be provided;
- How an injured employee will be transported to a medical facility; and
- The process for ensuring safety data sheets (SDS) or other written materials are provided to a medical facility for any hazardous substance to which an injured employee has been exposed.

The only type of rescue that a trained PCC employee may perform is a non-entry rescue using a tripod/winch to rescue a single employee from a permit-required confined space when there is at least 5 feet of vertical distance from the employee to the surface. The employee must be connected to the winch via a body or chest harness they are wearing. When access to an employee is horizontal, the use of wristlets or ankle straps should be used to retrieve the entrant.

Department managers should complete Section 2.A. of *Form 3* to document how non-entry rescues will be performed and any required equipment to perform such rescues.

Entry rescue must be planned by the department manager whenever the use of the tripod/winch assembly is infeasible due to long horizontal distances between the entrant's work location and the access point, or situations in which more than one entrant accesses a permit-required confined space, or there is entry into a complex permit-required confined space. In such cases the department manager must coordinate rescue services with a 3rd party provider and document the name and contact information for such a provider in Section 2.B. of Form 3. A valid rescue plan is one in which the department manager can answer "yes" to all of the requirements shown on Form 3.

The completed Form 3 should be provided to the Entry Supervisor and reviewed by all members of the Entry Team.

In the event of an evacuation where an entrant is not able to leave the space on their own, the established rescue plan must be initiated.

- For non-entry rescues, the Attendant should begin retrieving the Entrant out of the space using the tripod/winch assembly and contact Public Safety at 971-722-4444.
- For entry rescues:
 - The Attendant must contact Public Safety at 971-722-4444 and the rescue provider designated on Form 3: Rescue Plan.
 - The Entry Team will stand by the permit-required confined space access to ensure that only designated rescue team members enter the space.
 Under no conditions will Entry Team members or Public Safety personnel enter the space.

The completed *Form 3* will be attached to the corresponding *Form 2* and a copy delivered to the EH&S office after entry is completed.

Department Managers can learn more about the requirements for an effective rescue plan by reviewing the contents of *Appendix G: Rescue Plans*.

Procedures for responding to emergencies in those parts of the Sylvania Utility Tunnel System that are not classified as permit-required confined spaces are provided in *Appendix H: Utility Tunnel Safety.*

G. Contractors

PCC project managers must ensure contractors and vendors follow applicable OR-OSHA regulations and all procedures outlined in this Plan as well as their own confined space program.

The PCC project manager will serve as the Entry Supervisor and complete sections of H&SM – Ch 5: Confined Space Entry & Tunnel Safety Page 10 of 12 the Form 2: Confined Space Entry Permit allowing the contractors to proceed. This includes reviewing Appendix C: Confined Space Indices as well as historical documents in AiM, and performing pre-entry briefings with Contractors regarding hazards the College has identified and controls implemented in a space to be entered. Contractors will provide and complete their own confined space permits in accordance with their confined space program. Additionally, contractors will provide and use their own atmospheric monitoring devices, ventilation systems and rescue equipment.

Once entries are completed, Contractors must debrief the PCC project manager regarding their experiences in the permit-required confined space.

Contractors must inform the PCC project manager of any evacuations and/or emergencies. Contractors are responsible for developing their own rescue plans and coordinating them with the PCC project manager.

If a Contractor is going to enter any part of the PCC Utility Tunnel System, the Contractor will follow all procedures outlined in the supplemental Utility Tunnel Safety Program attached in *Appendix H: Utility Tunnel Safety*.

In situations where both Contractor and PCC employees enter the same permit-required confined space at the same time (joint entry), both the contractor's as well as PCC's entry permit will be completed and posted (dual-permitting). The entry will be coordinated by the PCC Entry Supervisor.

H. Tunnel Safety

Entry into, and work performed in areas of the Utility Tunnel System at the Sylvania campus that are not designated permit-required confined spaces will be done in accordance with the procedures established in *Appendix H: Utility Tunnel Safety* and the entry documented on *Form 4: Utility Tunnel Safety Work Plan*.

V. TRAINING

All employees who enter confined spaces or the Sylvania Utility Tunnels will be trained in the procedures, requirements and equipment outlined in this Plan. EH&S has developed training on the use of these procedures as well as the required training elements outlined in the OR OSHA Confined Space Standard.

Initial confined space training is provided to all authorized employees serving on permitrequired confined space entry teams regardless of their duties. This training will include:

- Classification criteria of confined spaces;
- Roles and responsibilities pertaining to this Plan;
- PCC's permit-required confined space entry procedures and associated forms;
- Emergency conditions, evacuations, and rescue requirements;
- Hands-on demonstration of atmospheric testing and monitoring devices and examples of PCC's non-entry rescue equipment.

Department managers must provide employees training on department specific procedures and equipment used for permit-required confined spaces entries. This training must cover:

- Procedures for use of department specific permit-required confined space entry equipment;
- Hazard controls identified by the department manager when completing Form 1 for specific confined spaces;

- Rescue plans specific to the department or spaces the employees will be entering.
- Working knowledge of first aid and cardiopulmonary resuscitation (CPR).

Additional training requirements should be included when the employer has reason to believe that an employee lacks the skill or understanding needed for safe work in confined spaces. Refresher training must be provided when:

- There is a change in the confined space program and/or equipment used for entry;
- An employee's duties change to include work in permit-required confined spaces;
- An employee demonstrates a lack of knowledge retention;
- There is a change in a space, such as a hazard for which there was no prior training, or a space previously classified as a confined space becomes a permit-required confined space.

All training will be documented.

VI.RECORDKEEPING

- **A. Training Records** Training records for EH&S provided content will be maintained in PCC's online learning management system, which can be found at MyCareer@PCC.
- **B. Form 1: Confined Space Classification** All completed *Form 1* documents must be attached as a "Related Document" to the AiM work order associated with the work conducted in the space. A copy of each form must be provided to EH&S for review. All documentation will be maintained for at least 3 years.
- C. Form 2: Confined Space Entry Permit All completed, cancelled, or expired Form 2 documents must be attached as a "Related Document" to the AiM work order associated with the work conducted in the space. A copy of each form must be provided to EH&S for review. All documentation will be maintained for 3 years.
- **D. Form 3: Permit-Required Confined Space Rescue Plan** All *Form 3* documents must be attached as a "Related Document" to the AiM work order associated with the work conducted in the permit-required confined space. A copy of each form must be provided to EH&S for review. All documentation will be maintained for 3 years.
- **E. Calibration Records** EH&S will maintain a copy of the calibration records for PCC's multi-gas meters used in accordance with this Plan.
- **F. Equipment Inspection Records** EH&S will maintain a copy of the inspection records for the Rescue Tripod, winch, and Air Blower systems used to support confined space entry operations.