

Subject: Safety Programs and Requirements: Confined Space

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The Site Safety Representative will ensure all potential confined spaces at each telescope or laboratory are evaluated in accordance with the OSHA regulation, 29 CFR 1010.146. A Confined Space Program will be implemented for all areas where there is a need to perform any activity within a Confined Space as defined by the OSHA standard. The confined Space Program will be reviewed annually and as regulations require.

Confined spaces may have limited openings for entry and exit, unfavorable natural ventilation and not designed for continuous worker occupancy. General examples include: pits, septic tanks, storage tanks, telescope cells, vessels, vaults, and furnaces. Specific examples in Steward Observatory include the pit under the test tower in the Mirror Lab and the interior of the mirror cell on the LBT.

Steward Observatory will inform employees of the existence and danger posed by the permit-required confined space (PRCS), by posting PRCS danger signs, conducting awareness training, or by other means. Areas listed on the Steward Observatory Confined Space inventory are required to be posted with a sign that reads, "DANGER – PERMIT REQUIRED CONFINED SPACE – DO NOT ENTER".

All Confined Space authorized personnel are expected to take an active role in maintaining a safe Confined Space Program. Each individual entering or attending a Confined Space shall be trained regarding the hazards associated with Confined Space entry. Training shall be provided prior to performing assigned duties that require a Confined Space entry, or prior to a change in duties. Untrained employees will be prevented from entering the PRCS.

Those spaces meeting the criteria of a Confined Space and having a known potential to contain hazardous atmospheres will be designated as a PRCS. Untrained personnel are **not** permitted entry into areas meeting OSHA criteria for confined spaces until pre-entry procedures demonstrate special training is not required. Procedures for entry without the need of a written permit or attendant into certain confined spaces are detailed in the Confined Space Program.

In the event of a need for Confined Space rescue, only appropriately trained and authorized personnel may enter a confined space for rescue purposes. Training for rescue and emergency services must be in accordance with 1910.146(k). This section requires annual rescue simulation exercises, CPR, and first-aid certification.

For more information on the official University of Arizona documentation on this subject, please go to: http://dev-ua-risk-management.pantheon.arizona.edu/sites/default/files/confined space hsi 2014 0.pdf