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1.0 OBJECTIVES

Establish the requirements and performance standards needed to protect employees and contractors from hazards associated with confined space entry and work, whether permit- or non-permit required.

2.0 SCOPE

This policy applies to all employees, visitors, vendors and contractors who work on Finch Paper LLC property.

3.0 DEFINITIONS

- 3.1 ACCEPTABLE ENTRY CONDITIONS:** The conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit required confined space entry can safely enter into and work within the space.
- 3.2 ATTENDANT:** An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant duties assigned in the employer's permit space program.
- 3.3 AUTHORIZED ENTRANT:** An employee who is authorized by the employer to enter a permit required space.
- 3.4 BLANKING OR BLINDING:** The absolute closure of a pipe, line, or duct by the fastening of a solid plate that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate. Blanks that are put in place as part of a confined space entry must be tagged with **"IN PLACE FOR LOCKOUT # _____ – DO NOT REMOVE"**.
- 3.5 CONFINED SPACE:** A confined space is a space/area that meets each of the following criteria: Is large enough and so configured that an employee can enter and perform work; has limited or restricted entry or exit; and, is not designed for continuous employee occupancy.
- 3.6 DOUBLE-BLOCK & BLEED:** The closure of a line, duct, or pipe by closing and locking two (2) in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two (2) closed valves.
- 3.7 EMERGENCY:** Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit required confined space that could endanger entrants.

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- 3.8** ENGULFMENT: The surrounding and effective capture of a person by a liquid or finely divided (i.e. flow-able) solid substance that can cause death by filling or plugging the respiratory system, or, that can exert enough force on the body to cause death by strangulation, constriction, or crushing.
- 3.9** ENTRY: The action by which a person passes through an opening into a Permit Required Confined Space. Entry is considered to have occurred at the point any part of an employee's body breaks the plane of an opening into the space.
- 3.10** ENTRAPMENT: The configuration of the inside of a space that traps or smothers an entrant such as inwardly converging walls, or a floor which slopes down and tapers to a smaller cross section.
- 3.11** ENTRY PERMIT: The written or printed document that is provided by the employer to allow and/or control entry into a permit space and that contains the information specified by the standard.
- 3.12** ENTRY SUPERVISOR: The person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by the standard.
- 3.13** HAZARDOUS ATMOSPHERE: Hazardous Atmosphere is an atmosphere with one or more of the following:
- 3.13.1 Flammable gas, vapor, or mist in excess of 10% of its Lower Flammable Limit (LFL);
 - 3.13.2 Airborne Combustible dust in excess of its Lower Flammable Limit (LFL);
 - 3.13.3 Atmospheric oxygen concentration below 19.5% or above 23.5%;
 - 3.13.4 Atmospheric concentration of any substance in excess of its Permissible Exposure Level (PEL);
 - 3.13.5 Any other atmospheric condition that is Immediately Dangerous to Life or Health (IDLH)
- 3.14** HAZARDOUS MATERIALS - Caustic solutions, acid solutions, flammable liquids, hot (>140° F.) materials, or any other process materials that may pose potential health hazards require a permit. Examples of such materials include but are not limited to: sulfuric acid, liquor, chlorine, chlorine dioxide, stock/pulp lines, sulfur dioxide, ammonia, propane, natural gas, methanol, hydrogen peroxide, hydrogen sulfide, and specialty chemicals.

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- 3.15** HOT WORK PERMIT: The employer's written authorization to perform operations (i.e., riveting, welding, cutting, grinding, burning, and heating) capable of producing a source of ignition.
- 3.16** IDLH (Immediately Dangerous to Life and Health): Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.
- 3.17** INERTING: The displacement of the atmosphere within a permit space by a noncombustible gas (i.e., nitrogen) to such an extent that the resulting atmosphere is noncombustible.
- 3.18** ISOLATION: The process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes or ducts; a double block and bleed system; lock-out/tag-out of all sources of energy; blocking or disconnecting all mechanical linkages, or other acceptable means of releasing stored energy (e.g. hydraulic).
- 3.19** LEL/LFL (Lower Explosive Limits or Lower Flammable Limits) the lowest percentages or concentration of a flammable gas or vapor in air that will explode or ignite. In confined space entry atmospheric testing, test instruments are set at 10% of the LEL.
- 3.20** LINE BREAKING: The intentional opening of a pipe, line, or duct that is or has been carrying process or hazardous materials.
- 3.21** NON-PERMIT CONFINED SPACE: A confined space that does not require a formal entry permit because it does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm; there is no reasonable expectation of hazardous conditions developing.
- 3.22** OXYGEN DEFICIENT ATMOSPHERE: An atmosphere containing less than 19.5% oxygen by volume.
- 3.23** OXYGEN ENRICHED ATMOSPHERE: An atmosphere containing more than 23.5% oxygen by volume.
- 3.24** PPM (Parts Per Million): Measure of parts of a product in a given volume (Comparison - 1% = 10,000 ppm)
- 3.25** PERMIT REQUIRED CONFINED SPACE (PRCS): Is a Confined Space that meets one or more of the following criteria:

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- 3.25.1 Contains or has the potential to contain, a hazardous atmosphere,
- 3.25.2 Contains a material that has the potential to engulf an entrant;
- 3.25.3 Has a hazardous internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
- 3.25.4 Contains any other recognized serious safety or health hazard.
- 3.25.5 In general, a permit required confined space is any area that has hazard(s) present that makes it dangerous to enter without taking special precautions.

3.26 PERMIT SYSTEM: The employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry.

3.27 PROCESS MATERIALS - Process materials include, but are not limited to, corrosive liquids, slurries and gases, liquids and gases including steam, water and condensate, hydraulic lines (that cannot be zero energy verified), toxic liquids and gases, combustible, flammable or explosive liquids and gases, abandoned stock lines, and hot slurries including pulp and paper stock.

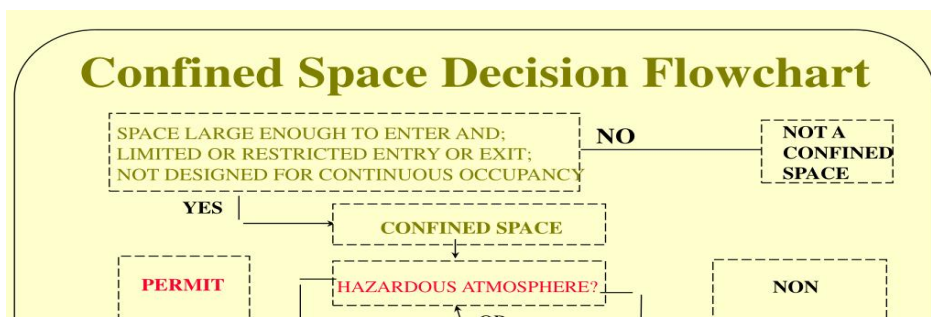
3.28 PROHIBITED CONDITION: Any condition in a permit space that is not allowed by the permit during the period when entry is authorized.

3.29 RESCUE SERVICE: Personnel designated to rescue employees from permit spaces. (Glens Falls Fire Department)

3.30 RETRIEVAL SYSTEM: The equipment (including a retrieval line, chest or full body harness, wristlets, if appropriate, and a lifting device) used for non-entry rescue of persons from permit spaces. The retrieval line must be attached to a mechanical device or a fixed point outside the permit space.

4.0 IDENTIFYING A PERMIT-REQUIRED CONFINED SPACE

4.1 Refer to the below flow chart which represents the decision process associated with identifying confined spaces and/or permit-required confined spaces.



space through training. Also, a sign the existence of the confined space.

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- 4.3** All confined spaces are numbered and listed in the inventory (**Appendix A**) to ensure proper lockout and entry permit cross reference. Spaces are referenced to mill equipment.

5.0 NON-PERMIT REQUIRED CONFINED SPACES

- 5.1** A permit-required confined space may be reclassified into a non-permit confined space when it does not contain, or with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.
- 5.2** To re-classify a permit-required confined space into a non-permit confined space the following conditions must be met:
- 5.2.1** If the PRCS poses no actual or potential atmospheric hazards (verified through air monitoring and inspection), and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit space for as long as the non-atmospheric hazards are eliminated.
- 5.2.1.a** Examples of Non-permit confined spaces are equipment closets, crawl spaces, machinery cabinets, ventilated tunnels, drop ceilings, open pits.
- 5.2.2** The basis for determining that all hazards in a PRCS have been eliminated must be documented and certified with the date, location of the space, signature of person(s) making the determination. This documentation shall be made available to each employee entering the space or to that employee's authorized representative. See Permit Required Confined Space Reclassification Form – **Appendix H**.

6.0 PERMIT REQUIRED CONFINED SPACE ENTRY PROCEDURE

- 6.1** The most common hazardous conditions associated with Confined Space Entry are oxygen deficiency, combustible gases, and toxic gases. This procedure addresses each of these concerns, and attempts to familiarize the worker with other hazards.
- 6.2** To ensure a safe work environment during Permit Required Confined Space entries, the following procedures are to be followed:
- 6.2.1 PREPARATION OF THE CONFINED SPACE**
- 6.2.1.a** The Finch Paper LLC Lockout/Tagout/Tryout policy must be followed as applicable.
- 6.2.1.b** The permit required confined space must be flushed where applicable, using the best practical method, without performing an actual entry (without any part of the body breaking the plane of the permit space).

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- 6.2.1.c The atmosphere in the permit required confined space will be tested by a trained person for oxygen deficiency, oxygen enrichment, combustible gases, and toxic gases or vapors, to determine suitability for entry. These tests are to be performed prior to initiating entry and should be performed at various heights and depths of the confined space to ensure the entire space is safe. Acceptable air tests must be achieved. Employees shall have an opportunity to observe this testing. The readings will be recorded on the Confined Space Permit and on the Air Quality Record.
- 6.2.1.d A confined space entry permit must be completed prior to entry into a confined space. Each involved person must verify all sections of the confined space entry permit have been completed. This includes testing the atmosphere for oxygen deficiency, oxygen enrichment, combustible gases, and toxic gases or vapors. (See **Appendix B** for a sample of the Confined Space Entry Permit). The confined space entry permit must remain displayed at the entrance to the confined space the entire time the permit is open. It will be signed by the Entry Supervisor and the Attendant who is assigned to the job. The time and date the permit expires must be noted on the permit in the appropriate place.
- 6.2.1.e All lines connected to the confined space, including sewer connections, will be checked as a source of hazard.
- 6.2.1.f Before entering a confined space served by a pipeline carrying liquid, corrosive liquid, steam, or other gases under pressure or at temperatures or volumes which could cause personal injury, the valves serving the confined space must be tightly secured and locked out with an appropriate device so as to assure no liquid, steam, gas, or product can leak into the confined space. In the case of piping that opens into the confined space, the pipe(s) must be isolated by such means as blanking, misaligning, removing a section of the line, or double block and bleeding, for example. Appropriate tags shall be used to communicate the purpose of the isolation.
- 6.2.1.g The product normally found in the permit required space should be removed where possible before the entry is made.
- 6.2.1.h Openings within a confined space into which entrants could fall must be protected (i.e., gratings or guard rails). See Floor/Wall Opening Policy for additional information.

7.0 PERSONAL PROTECTIVE EQUIPMENT (PPE)

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- 7.1** A valuable source of information regarding the use of personal protective equipment while working with or handling chemicals is the Safety Data Sheet that accompanies each chemical and raw material received in the plant. These sheets are readily available through Team Leaders or on Finch2.
- 7.2** The Entry Supervisor(s) will determine the level and type of personal protective equipment that will be worn for each specific permitted space and work being performed through review of the specific task and the Confined Space Inventory sheet (**Appendix A**). All Personal Protective Equipment will be inspected by the wearer prior to use.
- 7.2.1** Examples of PPE that may be required to enter / work in a confined space:
- 7.2.1.a** Eye and Face Protection – approved goggles and/or face shields
- 7.2.1.b** Protective Clothing – rain gear, boots, gloves, etc
- 7.2.2** Respiratory Protection – must be approved for user and task. Employee must be trained and fit tested. If a confined space must be entered that has excessive amounts of gases or an oxygen deficiency that cannot be corrected, a Self-Contained Breathing Apparatus (SCBA) must be worn.
- 7.2.3** Non-entry Rescue Equipment - To facilitate non-entry rescue, a full body harness with "D" Rings for attaching a lifeline shall be worn by each entrant at all times while in the confined space. (In the event that the entrance/exit opening is less than 18 inches (45 cm) in diameter, a wrist type harness may be used). Life lines must be attached to a mechanical device or secured to a point outside the permit space. The only exception to wearing non-entry rescue equipment will be if the rescue equipment will increase the risk during entry, or if it would not contribute to the rescue efforts.
- 7.2.4** NOTE: Protective clothing and respiratory equipment are not to be used as a substitute for cleaning and ventilating.

8.0 STANDARD ENTRY PROCEDURES

- 8.1** Two (2) or more trained employees are to be assigned to any task involving permit required confined space entry. One (1) of the employees will be designated as the "Attendant". In the event of an emergency, the first duty of the Attendant must be to seek emergency response assistance, which includes calling the emergency 611 telephone number to report the incident. At no time shall the Attendant enter the confined space or leave the confined space unattended.

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- 8.2 An Entry Supervisor may also serve as an Attendant or as an Authorized Entrant as long as that person is trained in each position that he or she fills.
- 8.3 Each employee entering a confined space shall be properly attired in protective clothing and equipment as required.
- 8.4 Each employee entering a confined space will comply with Finch Paper LLC's lockout/tagout/tryout policy.
- 8.5 The security guard must be notified prior to a confined space entry so they can ensure the Glens Falls Fire Department is on standby in case of an emergency. Should Glens Falls Fire Department become unavailable, the confined space(s) will be evacuated until they become available again. See Section 13 for additional information.
- 8.6 All employees entering the confined space will review the completed Confined Space Entry Permit to ensure that it is current and completed in its entirety.
- 8.7 All entrants must wear retrieval equipment specified by the permit and as outlined in the Confined Space Inventory (**Appendix A**). Exceptions to this segment may be warranted if such use would increase the risk to authorized entrants or the system would not contribute to the rescue. (Any exceptions to this procedure must be approved by the Department Manager or the Safety Department). If the lifeline is required, it shall be overseen by the Attendant.
- 8.8 Communication shall be maintained between the Attendant and the Entrant – communication type shall be documented on the Confined Space permit.
- 8.9 Attendant records each entrant into and out of the confined space on the Entrant Accountability List – **Appendix G**.

9.0 TOOLS

- 9.1 All tools must be in good condition.
- 9.2 Where explosive or combustible atmospheres may be encountered, only non-sparking tools shall be used.
- 9.3 If cutting, welding, or hot work is to be done, a hot work permit must be secured prior to the commencement of the "hot" work. Adequate ventilation must be provided to ensure the confined space monitor is not alarming.
- 9.4 All lights and electric power tools used for confined space entry will be reduced voltage (6 or 12 volts) type, or will be equipped with GFI's (Ground Fault Interrupters).

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9.5 Rescue tools and equipment are readily available through the rescue team – Glen Falls Fire Department. GFFD is made aware of confined space entry and has all applicable rescue equipment ready and available in the event of an incident.

9.6 Ladders used should be securely tied off and must not be removed while anyone is inside of the confined space. Only one (1) person is to be on the ladder at a time.

10.0 MONITORING AIR QUALITY

10.1 Persons testing the atmosphere in confined spaces must be familiar with the space being evaluated (and its associated chemicals) and be trained in the use of the gas analyzers.

10.2 Air quality tests must begin with oxygen content, combustibility, and then toxic substances. Air quality tests must be performed as follows:

10.2.1 Initial atmospheric checks – pre-entry. Use Confined Space Permit (**Appendix A**)

10.2.2 Periodic testing – every two hours (**See Section 18 for additional detail on testing requirements**) and, for prolonged jobs, (jobs lasting more than one shift) more if feasibly possible. Use Confined Space Air Quality Record (**Appendix D**)

10.3 Toxic substances must include any potential or suspect chemical that may be present in that confined space.

10.4 If potential hazards cannot be isolated, continuous monitoring is required. If potential hazards can be isolated, periodic monitoring is required.

10.5 NOTE: Any employee who enters the confined space, or that employee's representative, shall have an opportunity to observe the air quality testing.

10.6 Training Guidelines:

10.6.1 Training should include understanding the allowable concentration for oxygen, carbon monoxide, sulfur dioxide, chlorine, chlorine dioxide, hydrogen sulfide, ammonia, and/or lower explosion limits.

10.6.2 Those using instruments need to be familiar with the use of the instrument that will be used in their area.

10.7 Test Equipment:

10.7.1 Calibration and Bump Testing of the hand-held gas analyzers will be accomplished by that area's maintenance department or other trained employee.

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The gas analyzers will be bump tested daily and calibrated per the OEM recommendation. Gas analyzers used for vessel entry will bump tested pre-use. Complete documentation of calibrations and bump tests will be kept in each area. Gas analyzers have built in systems to require bump test and periodic calibration. Proof of these tests can be printed if required.

11.0 EMERGENCY NOTIFICATION PROCEDURE

- 11.1** In the event than an emergency develops in or near the Confined Space, it may be necessary to seek assistance from additional resources. Should this need arise, the following procedure shall be followed:
- 11.2** Extension 611 is to be used only in emergency situations:
- 11.2.1 When calling for an ambulance for an injured employee
 - 11.2.2 In case of an uncontrollable chemical leak
 - 11.2.3 In the event of a fire
 - 11.2.4 In the event a confined space rescue must be performed
- 11.3** Be prepared to provide the following information:
- 11.3.1 Nature of the emergency (fire, chemical, medical or rescue)
 - 11.3.2 Extent of the injury (injuries), if known
 - 11.3.3 Number of people involved, if known
 - 11.3.4 Location (department, area) where the emergency has occurred including Ambulance Pick-Up number nearest the emergency
 - 11.3.5 Your name, and the telephone number where you can be contacted if additional information is requested
 - 11.3.6 **Be sure you hang up the phone last!** This will assure that the guard has sufficient information to make the appropriate agency contact.

IN CASE OF EMERGENCY CALL 611

- 11.4** This number (611) will put you in contact with the guard station, which is open 24-hours. The guard will then make contact with the appropriate agency / department to initiate their response.

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- 11.5** If phones are out of order, use a two-way radio - Channel 13 to call security. If radios are not available, send a runner to the nearest security office.
- 11.6** The Glens Falls Fire Department is the authorized rescue team for Confined Space Entry emergencies. The safety department will ensure that the Glens Falls Fire Department maintains their training and equipment as required by this standard.

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12.0 EMERGENCY EVACUATION PROCEDURE

- 12.1** In the event the Entry Supervisor or the Trained Attendant recognizes a real or potential permit space hazard (in or around the permit space), an emergency evacuation of the space is to be ordered. Once ordered, all entrants are to exit the permit space as quickly and safely as possible.
- 12.2** Once clear of the hazard, each entrant is to report directly to the Attendant so that they may account for every entrant.
- 12.3** Re-entry can only be initiated after the Permit Required Confined Space Permitting process has been completed, and the space has been designated acceptable for entry. (Repeat the same procedure as was performed prior to the initial entry).
- 12.4** Re-permitting is required any time there is an indication or suspicion that a hazard may have been (or has been) introduced into the permit space.

13.0 PERMIT TERMINATION PROCEDURE

- 13.1** The Entry Supervisor shall be responsible for termination of the vessel entry permit when any of the following exist:
 - 13.1.1 A condition arises that is not allowed under the permit in or near the permit space.
 - 13.1.2 The original duration of the permit has expired.
 - 13.1.3 The entry operations covered by the permit have been completed and,
 - 13.1.4 All individuals who were performing work in the permit space have exited the space and are all accounted for.
 - 13.1.5 All equipment has been removed from the space.
 - 13.1.6 It has been confirmed that all work in the space has been completed.
- 13.2** The permit shall then be removed from the posting location outside the permit space and kept in the department in which the confined space was located and kept on file for one year.
- 13.3** As soon as the permit is removed, the openings to the space will be closed or otherwise barricaded to prevent unauthorized entry (e.g., red barrier tape and indicator who to contact with questions).

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- 13.4** If work in the space is not to be continuous, and the space will be left unattended for a period of time, the permit will be removed and the openings to the space will be closed or otherwise barricaded to prevent unauthorized entry (i.e., barrier tape for a horizontal entry).
- 13.5** Before work can commence in this space, the conditions of the permit must be reestablished, after which the permit may be reissued.
- 13.6** This may be the same document that was removed, providing the proper entries are made to make the permit valid.

14.0 TRAINING REQUIREMENTS

- 14.1** All employees who perform work regulated by this standard shall be provided training so as to acquire competence in the understanding, knowledge, and skills necessary to safely perform the duties assigned under this section.
- 14.2** Training is to be provided to each affected employee:
- 14.2.1 Before the employee is first assigned a duty associated with this procedure.
 - 14.2.2 Whenever there is a change in permit space operations that presents a hazard about which an employee has not been previously trained.
 - 14.2.3 Whenever there is reason to believe either that there are deviations from the permit space entry procedures established or that there are inadequacies in the employee's knowledge or use of these procedures.
 - 14.2.4 Training shall establish employee proficiency in the duties required by this procedure and shall introduce new or revised procedures.
- 14.3** The employer shall certify that the required training has been accomplished. Record of this training shall be maintained by the employer for the duration of the employee's employment.
- 14.4** Authorized Entrants, Authorized Attendants, and Entry Supervisors shall receive adequate training so that they may prove competence in all assigned duties as described previously in this document.

15.0 DUTIES AND RESPONSIBILITIES / ENTRY SUPERVISOR:

- 15.1** Complete Confined Space Permit (**Appendix B**) and document transfer **Appendix E** if permit is open more than one shift.

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- 15.2** Know the hazards that may be faced during entry of a permit space, including how exposure occurs, and the signs, symptoms, and consequences of exposure. See **Appendix C** for more details.
- 15.3** If confined space can be re-classified to Non-Permit Confined Space, work with Safety and other designees to reclassify. Use **Appendix H** to document reclassification.
- 15.4** Before the entry permit or transfer sheet can be signed, and prior to entry, verify that:
- 15.4.1 All tests specified by the permit have been conducted.
 - 15.4.2 All procedures and equipment specified by the permit are in place.
 - 15.4.3 All employees involved with the entry are fully informed of the conditions and hazards they might encounter while entering/working in the confined space.
 - 15.4.4 All employees are properly equipped with protective clothing and equipment.
 - 15.4.5 Be responsible for the overall safety of the confined space entry.
- 15.5** Terminate the entry and cancel the permit.
- 15.6** Verify that rescue services are available and that a procedure exists for summoning them are operable.
- 15.7** Communicate to all entrants and attendants if rescue services become unavailable and ensure everyone vacates the confined space immediately until such time as rescue services become available. See Section 13 for additional information.
- 15.8** Remove unauthorized individuals who enter or attempt to enter the permit space during entry operations.
- 15.9** Determine whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the permit space that entry operations remain consistent with the terms of the entry permit and that acceptable entry conditions are maintained.
- 15.10** The entry supervisor must be on Finch Paper LLC property and available to answer questions or concerns from the attendant or entrants.
- 15.11** NOTE: More than one Entry Supervisor may be signed onto the permit at one time. An example would be two separate contractor groups working in the same confined space. Each would have responsibility for their workers and the entire confined space.

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16.0 ATTENDANT:

- 16.1** Know the hazards that may be faced during entry of a permit space, including how exposure occurs, and the signs, symptoms, and consequences of exposure.
- 16.2** Sign the Confined Space Entry Permit (**Appendix B**) or Transfer Sheet (**Appendix F**).
- 16.3** Continuously maintain an accurate account of authorized entrants in the permit space and ensure that the means used to identify authorized entrants accurately identifies who is in the permit space.
- 16.4** Remain outside the permit space during entry operations until entry is terminated or relieved by another trained attendant.
- 16.5** Communicate with authorized entrants as necessary to monitor their status and to alert them of the need to evacuate the permit space.
- 16.6** Monitor activities inside and outside the space to determine if it is safe for authorized entrants to remain inside the space, and order them to evacuate immediately under any of the following conditions:
 - 16.6.1 If the attendant detects a prohibited condition (such as gas alarms, power outages, or other unsafe circumstances).
 - 16.6.2 If the attendant detects the behavioral effects of a hazard exposure in an authorized entrant.
 - 16.6.3 If the attendant detects a situation outside the space that could endanger the authorized entrants.
 - 16.6.4 If the attendant cannot effectively and safely perform all the duties required of an attendant.
 - 16.6.5 Rescue services become unavailable.
- 16.7** Summon rescue and other emergency services by calling 611 as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
- 16.8** If multiple spaces are to be monitored by a single attendant (**must be approved by Finch Safety**), an event or emergency in one confined space (under his/her observation) shall result in the same corrective actions in each confined space. That is, if an incident or emergency occurs that requires the evacuation of one of the confined

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spaces being attended by a single attendant, all confined spaces that he/she is responsible for shall be evacuated.

16.9 Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:

16.9.1 Warn the unauthorized person(s) that they must stay away from the permit space.

16.9.2 Advise the unauthorized person(s) that they must exit immediately if they have entered the permit space.

16.9.3 Inform the authorized entrants and the entry supervisor if unauthorized person(s) have entered the permit space.

16.10 Perform non-entry rescues if applicable.

16.11 Perform no duties that might interfere with the attendant's primary duty to monitor and protect authorized entrants.

16.12 If an incident or emergency occurs that requires evacuation of one of the confined spaces, the attendant will take the confined space permit(s) with him/her upon evacuation.

16.13 NOTE: There may be more than one attendant per confined space if contractors from two different companies are working at the same time. Each attendant still maintains full responsibility for their attendant duties.

17.0 AUTHORIZED ENTRANT:

17.1 Know the hazards he/she might face during entry of a permit space, including how exposures occur, and the signs, symptoms, and consequences of exposure.

17.2 Properly use personal protective equipment as required.

17.3 If necessary, provide personal lock as outlined in the "Finch Paper LLC Lockout Procedure".

17.4 Communicate with the attendant as needed so that the attendant can:

17.4.1 Monitor the status of the authorized entrant

17.4.2 Alert the authorized entrant of the need to evacuate the permit space

17.5 Alert the attendant whenever the authorized entrant recognizes:

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17.5.1 Any warning sign or symptom of exposure to a dangerous situation or unsafe condition.

17.6 Exit a permit space as quickly as possible whenever:

17.6.1 An order to evacuate is given by the attendant or the entry supervisor.

17.6.2 The authorized entrant recognizes any warning signs or symptoms of exposure to a dangerous situation or unsafe condition.

17.6.3 An evacuation alarm is activated.

18.0 CONTRACTOR REQUIREMENTS

18.1 In the event that contractors are required to perform work in Confined Spaces or Vessels, the following procedures must be followed:

18.2 The contractor(s) is/are to be informed that the workplace (in which they will be performing work) contains permit spaces and that entry is allowed only through compliance with the 29 CFR1910.146 and the Finch Paper LLC Permit Space program, as detailed in this document.

18.3 The contractor(s) is/are to be apprised of the elements, including the hazards identified and of our experience(s) with work performed within the space, and the reason(s) that Finch have classified this space as a "permit required space".

18.4 The contractor(s) is/are to be made aware of any precautions or procedures that have been implemented for the protection of employees in or near permit spaces where the contractor's personnel will be working, including specific lockout procedures.

18.5 Entry operations are to be coordinated with the contractor(s) when both Finch employees and contractor personnel or multiple contractors will be working in or near permit required spaces.

18.6 Provide air monitoring for confined space entry in addition to Finch initial and periodic air monitoring when conditions require. Use **Appendix D** for documentation.

18.7 In addition to complying with these permit space requirements, each contractor who is retained to perform permit space entry operations shall:

18.7.1 Provide Finch Paper with names and dates of contractor employees trained in this procedure who will be coming on site per Contractor/Vendor Safety Training Program.

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18.7.2 Obtain any available information regarding permit space hazards and entry operations from the host employer.

18.7.3 Coordinate entry operations with our personnel who will be working in or near the permit space(s).

18.8 In all cases, the contractor and employer share the responsibility to effectively communicate with each other, and to make every attempt to minimize the risk of injury.

18.9 When multiple contractors are entering a confined space at the same time, the following are approved methods of ensuring the overall safety of the operation:

18.10 Finch will initiate the confined space permit and each contractor will work off the Finch permit. Air monitoring will be performed by Finch every two hours. Use **Appendix D** for documentation.

18.10.1 Finch will initiate the confined space permit and each contractor will have their own employees monitor the space (continuously) and document air monitoring every hour on Appendix D. Contractor will use the Finch permit (**Appendix B**) and program to document air quality monitoring (**Appendix D**) entrant entry and exit (**Appendix G**), attendant transition (**Appendix F**) and entry supervisor transition (**Appendix E**).

18.10.1.a Contractors may be asked to provide air sampling bump tests and calibrations.

18.10.1.b Finch will be required to monitor space every two hours.

18.10.2 If more than one contractor is entering the confined space at the same time, one attendant may be designated for all entry as long as Finch and all parties agree.

18.10.2.a Contractor company providing attendant and air sampling will be required to show proof of training and calibration records.

19.0 PLAN REVIEW AND UPDATE

19.1 Reviewing the permit space program: The confined space program will be reviewed and updated when:

19.1.1 Changing conditions cause the current plan to lose its maximum protection.

19.1.2 A review of confined space permits indicates revision is necessary.

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- 19.1.3 Using the canceled permits retained within 1 year after each entry and revise the program as necessary, to ensure that employees participating in entry operations are protected from permit space hazards.

NOTE: Employers may perform a single annual review covering all entries performed during a 12-month period. If no entry is performed during a 12-month period, no review is necessary.

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APPENDIX A
Finch Paper LLC Confined Space Inventory

Space & Location			Hazards														Personal Protective Equipment							
Center	Eq Number	Space Name	Number of Entry Points	Atmospheric										Physical						All equipment required to enter the space				
				Oxygen (deficient/Enriched)	Explosive (Gas/Vapors)	Explosive (dust)	Carbon Monoxide	Hydrogen Sulfide	Sulfur Dioxide (SO2)	Chlorine Dioxide (ClO2)	Ammonia (NH3)	Methanol	Mechanical	Electrical	Process Lines (In/out)	Configuration (entrapment)	Engulfment (Solid/Liquid)	Temperature Extrem (Hot/Cold)	Fall Hazard (people/ equipment/materials)	Restricted Entry/Exit	Chemical PPE	Respiratory PPE	Other PPE	Describe other PPE required (air purifying respirator, SCBA, welding prot., gloves, chemical prot., etc.)
	01290	Chip Chute Steaming Vessel	1					x		x		x		x	x	x								
	00321	Impregnation Vessel	2					x		x		x		x	x	x								
	00124	Digester	2					x		x		x		x	x	x	x							
	00137	Blow Tank	2					x		x		x		x	x	x								
	00110	No. 1 Seal Tank	1					x						x	x	x								
	00111	No. 2 Seal Tank	1					x						x	x	x								
	01311	No. 1 MC Chute	1							x				x	x	x								
	01312	No. 2 MC Chute	1							x				x	x	x								
	00240	R8 absorption Tower	1	x						x				x	x	x			x	x	x		air purifying respirator/chem. pro	
	00248	Chlorate Unloading Tank	1											x	x	x			x	x	x		air purifying respirator/chem. pro	
	00079	Thickener Vat	2					x						x	x	x								
	01206	Seal Boxes	4					x	x					x	x	x								
	00075	#1 Brown Stock Washer Vat	2					x						x	x	x								
	00177	D100 Washer Vat	2							x				x	x	x								
	00175	No1 Caustic Washer Vat	2											x	x	x								
	00173	No2 Caustic Washer Vat	2											x	x	x								
	00171	Bleached Stock Washer Vat	2							x				x	x	x								
	01330	Bleach Plant Scrubber	3							x				x	x	x								
	00612	Pulp Mill Main Sewer	2	x			x	x	x	x	x			x	x	x								

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APPENDIX B
Finch Paper LLC Confined Space Entry Permit
(see separate document for one page permit)

**FINCH PAPER LLC
CONFINED SPACE ENTRY PERMIT**
Call Security before entering a Confined Space to establish a Rescue Plan
(518) 793 2541 x5380 Cell (518) 361-1827
DIAL 611 FOR EMERGENCIES / RADIO CHANNEL 13

Confined Space:				Confined Space Equipment Number:			
Site Location and Description:							
Purpose of Entry / Work to be performed:							
Permit Issue Date:				Permit Issue Time:			
Person in Charge of Work:				Entry Supervisor:			
Company Name Working in Confined Space (if other than Finch):							
The following items are complete – circle when applicable . Initial when complete and verified.							
Preparations and Equipment	N/A	Yes	Initials	Preparations and Equipment	N/A	Yes	Initials
Contents removed/purged/flushed				G.F.C.I. Equipment			
Lockout/Tagout				Non-sparking Tools			
Lines (s) Broken-Capped-Blanked				Fire Extinguisher			
Purge-Flush and Vent				Full-body Harness / Fall Protection			
Continuous ventilation in use				Lifeline			
Secure Area (Posted)				Tripod/Rescue Equipment Available			
Hot Work Permit				Safety Glasses / Goggles / Face Shield			
Respiratory Protection / SCBA				Hard Hat			
Air Monitor				Flashlight			
Slip, Trip & Fall Hazards Eliminated				Ear Muffs / Plugs			
Explosion-proof Lighting				Chemical Protective Suit			
Physical barriers or barricades installed				Communication Equipment & Procedure (to be used by attendant / entrant to maintain contact)			
Sharp edges removed or guarded							
Access/opening obstructions eliminated							
					N/A	Yes	Initials
Call Security (x611) to enter contact information on active confined space entry permit							
Security has confirmed that HAZMAT team (GFFD) is available for emergency rescue (NOTE: Confined space MUST be evacuated immediately if GFFD becomes unavailable for emergency rescue.							
Pre-entry meeting must be held with ALL personnel to review their specific roles and responsibilities under this Confined Space Entry Permit.							
Permit for entry into the confined space has been terminated by the Vessel Entry Supervisor and Security has been notified to end HAZMAT team (GFFD) availability							
Atmosphere Monitoring		Pre-Entry Test			Equipment Used / Last Calibration Date		
	Acceptable Range	Time	Reading	Initials			
Percent of Oxygen (O ₂)	19.5% to 23.5%						
Flammability (LEL)	< 10%						
Carbon Monoxide (CO)	< 35 ppm						
Hydrogen Sulfide (H ₂ S)	< 10 ppm						
Ammonia (NH ₃)	< 25 ppm						
Chlorine (CL ₂)	< 0.5ppm						

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Heat (F/C)					
Chlorine Dioxide	<0.1 ppm				
IF A NON-HAZARDOUS ATMOSPHERE THROUGHOUT THE COURSE OF THE ENTRY CAN BE MAINTAINED THEN PERIODIC MONITORING IS ACCEPTABLE (EVERY TWO (2) HOURS). IF A NON-HAZARDOUS ATMOSPHERE CANNOT BE MAINTAINED, CONTINUOUS MONITORING IS REQUIRED.					
Permit Entry Authorization I certify that all existing hazards have been eliminated and all above conditions have been satisfied.					
Print Name and Title					

Company Name, Supervisor Name and Signature of Supervisor(s) Responsible for Confined Space Entry Requirements

Name: _____
 Date: _____
 Time: _____

Name: _____
 Date: _____
 Time: _____

Name: _____
 Date: _____
 Time: _____

COPY OF PERMIT MUST REMAIN AT JOB LOCATION UNTIL WORK IS COMPLETED.
 CLOSED CONFINED SPACE ENTRY FORMS MUST BE RETURNED TO THE DEPARTMENT IN WHICH WORK WAS PERFORMED AND KEPT FOR ONE YEAR
 CONFINED SPACE PERMIT CLOSED: DATE: _____TIME: _____
 DIAL 611 FOR EMERGENCIES / RADIO CHANNEL 13

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APPENDIX C

Exposure and Symptoms Information for Finch Specific Hazards

The normal oxygen content of air is approximately 21%. Depletion of oxygen content in air, either by combustion or displacement with inert gas, is a potential hazard to personnel throughout industry.

OXYGEN CONTENT (% by VOLUME)	EFFECTS AND SYMPTOMS (At Atmospheric Pressure)
15 - 19%	Decreased ability to work strenuously. May impair coordination and may induce early symptoms in persons with coronary, pulmonary, or circulatory problems.
12 - 14%	Respiration increases in exertion, pulse up; impaired coordination, perception and judgment.
10 - 12%	Respiration further increases in rate and depth, poor judgment, blue lips.
8 - 10%	Mental failure, fainting, unconsciousness, ashen face, blue lips, nausea, and vomiting.
6 - 8%	8 minutes, 100% fatal; 6 minutes, 50% fatal; 4 - 5 minutes, recovery with treatment.
4 - 6%	Coma in 40 seconds, convulsions, respiration ceases, death.

NOTE: EXPOSURE TO ATMOSPHERES CONTAINING 12% OR LESS OXYGEN WILL BRING ABOUT UNCONSCIOUSNESS WITHOUT WARNING AND SO QUICKLY THAT THE INDIVIDUAL CANNOT HELP OR PROTECT HIMSELF/HERSELF.

3.0 SIGNS AND SYMPTOMS OF "OVER EXPOSURE"

3.1 AMMONIA: Eye, nose & throat irritation, difficulty breathing, bronchial spasms, pain in chest.

3.1.1 1st Aid: Skin - Flush immediately with water (15 minutes)

3.1.2 Eyes - Irrigate with water for 15 minutes

3.1.3 Inhaled - Remove to fresh air, provide oxygen, and seek medical attention.

3.2 CARBON MONOXIDE: Dizziness, headache, nausea, weakness, and confusion. Can cause cardiovascular disorders, frostbite, and dermatitis.

3.2.1 1st Aid: Removal to fresh air, provide oxygen, seek medical attention.

3.3 CHLORINE AND CHLORINE DIOXIDE: Burning of the eyes, mouth, nose, coughing, choking, vomiting, substernal pain, headaches, and dizziness; can lead to pulmonary edema and pneumonia.

3.3.1 1st Aid: Eyes - Flush immediately with lots of water

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3.3.2 Skin - Wash promptly with soap and water

3.3.3 Inhaled - Remove to fresh air, provide oxygen as necessary, and seek medical attention.

3.4 SULFUR DIOXIDE: Irritation to the eyes, nose and throat, choking, coughing, bronchial constriction, skin burns.

3.4.1 1st Aid: Remove to fresh air, provide oxygen, and seek medical attention.

3.5 HYDROGEN SULFIDE: Difficulty breathing, convulsions, irritation to eyes and respiratory system. Dizziness, headaches, and fatigue.

3.5.1 1st Aid: Eyes - Flush with lots of water

3.5.2 Skin - Flush with lots of water

3.5.3 Inhaled -Artificial respiration, provide oxygen, seek medical attention immediately.

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FORMS AND SYMPTOMS OF HEAT STRESS

FORM OF STRESS	SYMPTOMS	FIRST AID MEASURES
Heat Cramps	Sweaty skin Painful muscle spasms Normal body temperature	Give fluids Gently massage cramped muscles
Heat Exhaustion	Clammy or pale skin Weakness and fatigue Profuse sweating Nausea, vomiting Disorientation Headache Normal or slightly elevated body temperature	Remove victim from heat Loosen clothing Sponge skin with cool water Fan victim, but stop if victim shivers or develops goose bumps Give fluids. Give victim a drink solution of one pint water and one teaspoon salt every 30 minutes until victim recovers Obtain medical help if victim does not improve
Heat Stroke	Unconsciousness or mental confusion Dizziness Staggered walk Appears to be agitated Hot, dry skin Extremely high body temperature could reach or exceed 105°F	Get emergency medical aid immediately Remove victim from heat Remove clothing, place victim in a cool bath or apply cool compresses Do not give any fluids Do not leave victim alone Do not allow victim to become so cold that victim shivers Do not give aspirin or other medication in an attempt to lower the fever

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APENDIX D
Finch Paper LLC Confined Space Air Quality Record

FINCH PAPER LLC CONFINED SPACE AIR QUALITY RECORD

Date, Time & Initials	Oxygen 19.5% - 23.5%	Flammability <10% LEL/LFL	Hydrogen Sulfide H ₂ S <10 ppm	Ammonia NH ₃ <25 ppm	Chlorine Cl ₂ <0.5 ppm	Sulfur Dioxide SO ₂ <2 ppm	Heat F/C	Chlorine Dioxide CL02 <0.1ppm

Retest frequency is a minimum of every two hours: _____

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Transfer of Entry Supervisor Responsibility Form

VESSEL NAME _____

VESSEL NO. _____

ASSUMING SUPERVISOR RESPONSIBILITY	
Name	
Company	
Date	
Time	

Signature: _____

TRANSFER OF SUPERVISOR RESPONSIBILITY	
Name	
Company	
Date	
Time	

Signature From: _____

Signature To: _____

TRANSFER OF SUPERVISOR RESPONSIBILITY	
Name	
Company	
Date	
Time	

Signature From: _____

Signature To: _____

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APPENDIX F
FINCH PAPER LLC VESSEL ENTRY ATTENDANT LIST

VESSEL NAME _____

VESSEL NO. _____

ASSUMING ATTENDANT RESPONSIBILITY	
Name	
Company	
Date	
Time	

Signature: _____

TRANSFER OF ATTENDANT RESPONSIBILITY	
Name	
Company	
Date	
Time	

Signature From: _____

Signature To: _____

TRANSFER OF ATTENDANT RESPONSIBILITY	
Name	
Company	
Date	
Time	

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Signature From: _____

Signature To: _____

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APPENDIX H

Permit-Required Confined Space Reclassification Form

A permit-required space may be reclassified as a non-permit-required confined space when (a) the space poses no actual or potential atmospheric hazards, and (b) all hazards within the space are eliminated without entry into the space. This reclassification is only valid as long as the space remains hazard free. If hazards arise within a non-permit-required confined space, employees in the space must exit immediately and the space must be re-evaluated.

Confined Space Identification & Location:			
Purpose of Entry:			
Authorized Duration of Permit:	Date:	To:	
	Time:	To:	

Pre-Entry Hazard Elimination Measures Taken

	Yes	No	NA
1. Contents of the space removed	☐	☐	☐
2. Exposed electrical de-energized and verified	☐	☐	☐
3. Lockout, tagout and tryout procedures implemented	☐	☐	☐
4. All slip hazards eliminated	☐	☐	☐
5. Space poses no actual or potential atmospheric hazards; or if there are potential atmospheric hazards, testing (oxygen, flammable vapors/gases and toxic concentrations) has been conducted and documented	☐	☐	☐
6. Passageway and access opening obstruction hazards eliminated	☐	☐	☐
7. Sharp edges removed or guarded	☐	☐	☐
8. Physical barriers or barricades installed	☐	☐	☐

Additional Hazard Elimination Measure Taken

Steps Necessary to Identify Hazards That Develop During Entry

Atmospheric Monitoring Results (If testing required for potential atmospheric hazards)

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Agent	Limit	Test Results	Test Time	Tester's Initials
Oxygen	19.5% - 23.5%			
Flammables	< 10% LEL/LFL			
H ₂ S	< 10 ppm			
CO	< 25 ppm			

I certify that all identified hazards have been eliminated, that the confined space is safe to enter, and hereby reclassify the confined space as a non-permit-required confined space.

(Print name)

(Print Title)

(Sign name)

Once the space is returned to normal service, the non-permit-required classification is cancelled. The reclassification form is to be submitted to the Safety Department once the entry has been terminated.

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Date	Revision	Change
09/18/06	Original	Addition of controlled format.
07/11/07	1	Name change from Finch, Pruyn & Co., Inc. to Finch Paper LLC.
02/05/09	2	Revised section 9.2 to include air quality monitoring more than once per shift on prolonged jobs. Air quality tests must be performed as follows: Initial atmospheric checks, Atmospheric check after isolation and ventilation, periodic atmospheric tests – once every two (2) hours for prolonged jobs (jobs lasting more than one shift). Added 19.1 Reviewing the permit space program.
02/19/10	3	Addition of Appendices A: Permit and Confined Space Entry forms. B: Air Quality Monitor Inventory, C: Permit Required Confined Space Training Program. Updated Permit Sheet, Addition of Roles & Responsibilities: Entry Supervisor, Attendant and Entrant to Entry Permit package.
8/30/10	4	Addition of Non Permit Required Confined Spaces at Finch Paper LLC
5/1/13	5	CHANGED in Section 6.0 of policy to read: 6.0 NON PERMIT REQUIRED CONFINED SPACES: 6.1 # 8 & #10 Boiler Furnaces in the Power Plant have been reestablished as Non Permit Required Confined Spaces as of August 31, 2010. Extensive research of the atmospheric test records shows no air quality issues. Lock Out procedures have been reviewed to ensure that all dangers relative to vessel entry have been removed. The remaining possible hazard is oxygen deficiency. All personnel entering either # 8 Boiler Furnace or #10 Boiler Furnace will be required to wear Oxygen Crickets for the duration of the entry. (The crickets sense low oxygen levels and will vibrate, display a flashing light and emit an audible alarm to indicate alarm status.) If there are insufficient crickets, a hand held oxygen sensor of the type used for vessel entry will be placed inside the furnace for the duration of the entry. If either the cricket or the hand held sensor goes into alarm state, the entrants will evacuate. Note: The above applies only to the furnace, including the lobby burner, the superheater, and the section behind the superheater. Ductwork and Air Heaters are not covered. The mud drum and steam drum are not covered; they are still permit-required.
5/1/2013	5	CHANGED Section 10.7 of policy to read: 10. Test Equipment: 10.7. Calibration and Bump Testing of the hand-held gas analyzers will be accomplished by that area's maintenance department and will follow the manufacturer's recommended time intervals. At a minimum, gas analyzers will be calibrated monthly and bump tested daily. Gas Analyzers used for vessel entry will be calibrated and bump

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Date	Revision	Change
		tested on the day of entry. Complete documentation of calibrations and bump tests will be kept in each area.”
7/25/13	6	Reformatted, added back missing section 6.0, reissued (IMO7/29/2013)
3/23/18	7	Review of Policy, Some spelling and punctuation corrections made.
5/15/24	8	Added info to entrant accountability sheet asking if employee is locked out before entering confined space Removed information re: #8 and #10 boiler being non-permit required confined spaces Added information that entrants must exit confined space immediately should rescue services become unavailable. Added that other trained employees can also calibrate and/or bump test hand-held gas analyzers, not just maintenance department Permits shall be kept on file in the department in which the confined space is located Changed record-keeping for training documentation from 30 years to duration of employment Removed info as to OSHA enacting the law re: permit required confined spaces Changed MSDS to SDS and added that they can be found on Finch2 Changed testing requirement from once every 12 hours to once every 2 hours Added info to provide security guard ambulance pickup door # in the event of an emergency Added CL02 to the permit and air quality record Various miscellaneous changes and spelling/punctuation corrections Changed security radio channel from channel 1 to channel 13
2/20/2025	9	Section 9.71 the calibrations shall be done per the OEM recommendations
07/29/25	10	XXX

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Approvals

Authored/Revised By:	Sandra LeBarron			
	Print Name	Signature	Date	
Author's Manager:	Dan Lowell			
	Print Name	Signature	Date	
Mill Manager:	Dan Lowell			
	Print Name	Signature	Date	
VP, Human Resources:				
(If Needed)	Print Name	Signature	Date	