



The Confined Space Permit

Besides becoming a record of what was done, organizations use a Confined Space Permit as a prompt to help people remember what to do or as a generic procedure. However, according to the “Checklist Manifesto” by Dr. Atul Gawande, most organizations do not have sufficient procedures and training to make a checklist an effective memory jogger. In addition, without sufficient written documentation and training, many permits are improperly completed.

Most Regulated Confined Spaces must have a completed permit containing specific information at the entry point. But what about regulated areas that are not confined spaces or non regulated confined spaces? Do they require permits? To best answer these questions, it is important to understand what a permit does and should contain. A permit is a multi purpose document, but at the end of the day, it will become a record that should enable a reader to reconstruct what went on, in, or around the space during the task. In other words, the Permit is proof of your due diligence efforts. To achieve this, the permit should contain sections to record:

- (a) space and work details - mentioning the specific space as well as the type and when the work was performed will enable the reader to ensure they are looking at the right document.
- (b) last minute hazard review - listing the hazards found, including any discrepancies in hazards that were found on the original assessment verses on that particular day's entry. This allows the reader to gain understanding as to why some decisions were made.
- (c) hazard control deployment - noting what controls were implemented. This information in conjunction with the last minute hazard review, tells the reader how hazards were mitigated or controlled during the job.
- (d) verification/authorization - detailing those who participated in the preparation and entry into the space. The reviewer is then able to contact those involved for further information.
- (e) deviations and notations - to capture what occurred during the work. This information could be the entries and exits of the workers, gas monitor results, weather, hazard changes, etc.. These details provide further data to the reader as to why a specific course of action was taken.

With all this in mind, your permit should be set up in a way to ensure the data you need is captured during the project. Another consideration when designing the form is that most tradespersons hate paperwork. The “Checklist Manifesto” provides a revealing look at checklist design and implementation. Everyone thinks it is so easy, but it is not. Words that have different meanings and statements can have different degrees of completeness. Complex forms may be difficult to complete and simple jobs may render most check boxes “not applicable or N/A”. Too many, “N/A's” may lull some people into a false sense of security and then the only thing you check is whether or not the pen you are using is working.

When designing your form, we suggest having at least two distinct forms. We will call the first form a log

and the second form a permit. The log would record space details as well as deviations and notations. You could use this log on jobs in confined spaces with limited access or egress or with spaces that have non atmospheric hazards that could produce non Critical injuries. A log could be as simple as a notebook or a template that has blanks for specific information. Blanks can cause problems if the recorder has poor grammar and spelling skills. However, having a laminated list of key words with the Attendant can reduce the mistakes. Other actions to reduce the writer's block is wanting specific information in the log. For instance your procedures could list generic entry choices (eg. weather - high humidity, sunny, rainy, or windy or personnel entries, etc.). Keep the log fairly simple in design. For the other two types of spaces (see flow chart in the Introduction Sheet), you would use the log in conjunction with a permit. The permit would contain a last minute hazard review as well as hazard control deployment notes. The Permit's design should use a combination of pick lists, check boxes and blanks. Completion of the form should follow the steps in the project and mirror the sequence in supporting documents. The form should also be efficient to complete. In addition, it should limit duplication of information found in any other form.

No matter the design of your permit, it is important to have detailed written procedures on how to complete these forms and what data is to be included. As the "Checklist Manifesto" points out, lack of procedures and training on how to fill out the form is the main reason these things fail us when we need them most.

Finally, these forms must be reviewed and marked for completion at the end of the job. Your audit should ensure:

- (a) all blanks are filled in properly
- (b) slight deviations in penmanship showing the form was completed at different times
- (c) data is accurate (eg. names and signatures match, hazard listing is accurate and all personnel are recorded out of the space)
- (d) times are not always rounded to the nearest number
- (e) descriptions of the issues that arise are complete, understandable and what was done about it (eg. plan deviations, etc.) is also complete and understandable.
- (f) improvements needed for next time

This monitoring does two things. First, it signals to all the documentation is important to complete properly. Secondly, you will identify missing information quickly and have a chance to obtain the information before it is lost.

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CONFINED SPACE PERMIT

(Valid for up to 1 shift)

PERMIT WILL REMAIN AT ENTRY POINT UNTIL JOB IS COMPLETED

LOCATION and DESCRIPTION

of Confined Space _____

Date _____

PURPOSE of Entry _____

Shift _____

PROJECT SUPERVISOR _____

Phone _____

HAZARDS (Review the confined space, delete any hazard not potentially or actually present for the project.)			
Pre-Entry Readings	Acceleration/Sudden Movement	Flammable/Explosives	Poisons & Toxics
% of Oxygen _____	Biological materials	Gravity	Pressure
% of LEL's _____	Blocked Pathways	Lack of Oxygen	Reactive Material
Other: (Toxic, Temp. etc.) _____	Choices	Lack of Planning	Sensitizers
_____	Clutter	Light Extremes	Sharps
_____	Combustible Loading	Moving Equipment/Parts	States of Mind
_____	Corrosives	Noise	Structural Failure
_____	Electrical Current	Oxidizers	Synergy
_____	Energy Waves	Particulate Matter	Temperature Extremes
_____	Engulfment/Entrapment	People's Position	Vehicle Traffic
Tester _____		Unit ID Info _____	Time of test _____

HAZARD MANAGEMENT REQUIREMENTS (Put a ✓ in the box for task completed or N/A in the box if the task is not necessary)			
Lockout Switches & Valves		Entrant to Attendant Communications	
Blanking/Blocking of Pipes		Personal Protective Equipment	
Depressurization of Pipes		Chemical Protective Clothing	
Vehicle Barricades		Entrant Respiratory Protection	
Pedestrian Barricades		Retrieval System w/ Rescuer PPE	
Ventilation		First Aid & Packaging Equipment	
Purging		Chocking of Mechanical/Moving Parts	
Special Work Precautions		Lighting	
Welding /High Temperature /Other:		Refreshing/Clean up/Decontamination System	
RESCUE	Attendant _____	Retrieval System Set Up _____	
ASSIGNMENTS	Air System Monitor _____	Retrieval Personnel _____	
Dispatcher _____	Contact Method _____		

CERTIFICATION

I certify that I have personally examined the confined space and am satisfied that all the particular requirements listed in the procedures have been met AND THAT THE SPACE IS FREE FROM HAZARDS AND WILL REMAIN FREE FROM HAZARDS, making it safe to enter. (DELETE THE CAPITALIZE STATEMENT BEFORE SIGNING IF STATEMENT IS NOT TRUE.)

 (Signature of Evaluator)

 (Print Name)

 (Date)

ENTRANT PERMIT REVIEW ACKNOWLEDGMENT

The Confined Space Permit for this job have been reviewed with me and I will undertake to follow the stipulated procedures for this job.

Entrant Name	Signature	Entrant Name	Signature

