POLICY FOR WORK IN CONFINED SPACES

We can classify the risks of working in confined spaces in three major categories: risks related to the atmosphere, physical hazards and biological hazards.

Potential Risks: Oxygen deficiency, oxygen enrichment or combustion, presence of toxic or flammable gas, dangerous rescue attempt (without having the knowledge or necessary equipment), biological contamination, organic material (wood, dust, dirt, etc.) microorganisms (viruses, bacteria, molds, etc.), drowning (sand, grain or liquid), burial, crushing, pinch points, falls from a height, electric shock, cuts, burns, frostbite, heat stroke, etc.

Depending on their location, design and content, confined spaces carry significant dangers to the health and safety of workers. If the existing safety measures are not sufficient enough to make a safe confined space area for workers, then NO ONE CAN ENTER the confined space until additional precautions are made to ensure safety.

EBC Definition of a Confined Space

NOTE: Please refer to your provincial regulations for any differences

Any space completely or partially confined.

1. Not designed for people, nor intended to be. However sometimes it can be occupied to perform work;
2. Persons can only access and exit it from one restricted pathway;
3. It can be hazardous to one's health, safety or the physical well-being for anyone who enters, due to one of the following factors:
   a) Location, design or construction of the space, except for the restricted pathway provided in line 2;
   b) The atmosphere or insufficiency of natural or mechanical ventilation in the space;
   c) The materials or substances in the space;
   d) Other related risks that may be there.

In order to be considered a confined space, the location must meet the first two criteria (1 and 2) of the definition and one of the four factors (a, b, c or d) in criterion 3.

EXAMPLES of what might be considered a Confined Spaces:

A tank, silo, container, basin, hopper, room, vault, septic tank, manure pit, sewer pipe, manhole, fireplace, access well, a car or truck tank, cold storage, boat dock, autoclave (hermetically sealable container), sewer manhole, boiler, furnace, incinerator, ventilation duct, dust collector, reactor, etc.

Objective

This policy establishes the rules that must be applied to prevent risks related to work in confined spaces on construction sites.

Scope

This policy applies to involved parties under the authority of, and conducting any associated work for, the benefit of EBC or its subsidiaries.

At all times, this policy and procedure should be diligently applied with professionalism and respect for others. In case of doubt or conflict in its application, managers have the responsibility to contact EBC Human Resources management for guidance in its implementation.

Distribution

This policy must be provided to all persons, working both on and off project sites, during their orientation session.

LEGEND

The behavior or activity required by the organization.

Important non-compliance for the organization

Planning

In consultation with the contractor, the employer must develop a work method and a 'Confined Spaces Entry Form' to be completed just before entering a confined space. These documents must be available on the work site at all times.

What must be included in a work method:

- Gas concentration readings;
- Ventilation mode before and during the work, if required;
- Type of respiratory protection;
- Method for insulating ducts and lockout;
- Means of controlling flammable or combustible materials;
- Type of explosion protection and control of ignition sources;
- Measures for protection against falls;
- Lighting conditions;
- Management of heat/cold stress;
- Measures for hearing protection;
- Measures for biological agents;
- Management of joint activity in the work zone;
- Appointment of a person responsible for operations in the confined spaces;
- Confined Spaces Entry Form.

The Confined Spaces Entry Form must include these points:

- Confined space identification;
- Names of workers authorized to enter;
- Access type (number, shape, dimensions, location);
- Lockout of equipment, sealing ducts (energy used);
- Internal atmosphere (solid, liquid, gaseous, toxic, flammable);
- Work to be done (hot work, sandblasting, etc.);
- Other hazards evaluated in the confined space (falls, visibility, mold, etc.);
- Personal protective equipment required;

- Employer / Head Contractor general or specific rescue procedure;
- Means of communication.

- A rescue procedure that allows for help to come quickly to any worker performing work in a confined space. It must be developed and tested.

- The specific dangers in the confined spaces and their preventive measures must be communicated and explained to all workers before entering the confined space. It must be communicated by a competent person who is able to adequately inform workers of the correct methods of performing a job safely.

Organization

- The employer must provide the following for work in confined spaces:
  - Assign a supervisor for confined spaces who is dedicated exclusively to this work;
  - The emergency retrieval equipment in case of an emergency;
  - Equipment for ventilation and gas detection;
  - Any other equipment expected for the process / method.

Control

- It is prohibited for anyone who is not assigned work in, or is part of a rescue team in, a confined space to enter it. Only the workers who have been trained and have the knowledge required to perform work in confined spaces are qualified to enter. It is also prohibited for any person to enter the confined space if the supervisor is not there or if the form / permit has not yet been completed.
- The employer must ensure that the gas concentration readings are taken periodically or regularly (regular readings are mandatory when hot work is carried out), as expected

If the rules of the main contractor, safety code or any regulation are different than those described above, the strictest shall apply.

Roles and Responsibilities

For the employee, worker, subcontractor, etc.:

Everyone has the obligation to respect and enforce this policy and procedure.

The Manager

The manager ensures compliance of this policy for the staff under their responsibility and ensures that the policy is known by involved parties. In case of conflict, they shall communicate with the human resources department.

Human Resources Management

Human Resources management is responsible for ensuring the updates and distribution of the current policy. They must also oversee administration and determine disciplinary measures deemed appropriate for enforcement.

Disciplinary Measures

The person who does not respect the policy mentioned above will receive:

1. A verbal warning stating the correction(s) to be made, documented in the form of a correction or reprimand notice.
2. In the case of a repeated offence, a written warning is again written in the form of a correction or reprimand notice and is given to the person and to their superior.
3. Subsequently, if there is a recurrence, a write-up along with stricter disciplinary action resulting in an expulsion from the workplace for 1-2 workdays will be given.
4. In case of any further recurrence, a third written warning will be provided that can result in dismissal or expulsion from the project or a definite period of time.
5. Special Case:
   When a person breaches a description for an **Important organization non-compliance**

   In this specific case, the task performed must be stopped IMMEDIATELY, the first notice will correspond directly to step number 3 of disciplinary measures and the person will be expelled for a duration of 2 work days.

   In case of any further recurrence, step 4 will apply regardless of the number of prior warnings given.

Reference Documents

- Confined space entry permit
- Library of working methods

Associated Training

Working safely in confined spaces