Function of Beauty 5570 Snydertown Rd. Paxinos, PA 17824

CONFINED SPACE PROGRAM

1. Introduction

1.1. Function, Inc is committed to providing a workplace that is free from any recognized hazards.

1.2. As part of this commitment, the following written program has been developed to establish necessary requirements for all tasks involving entry into confined spaces.

1.3. This program is in accordance with 29 CFR 1910.146 Permit-Required Confined Spaces.

2. Scope

2.1. This program applies to any Function employees, or hired contractors who will be conducting work in confined spaces.

2.2. The scope of this program is to formally have a Confined Space Program for activity conducted in confined spaces at all Function Inc. locations.

2.3. In the event entry is needed the space will be attempted to be reclassified where the employee may now enter.

3. Definition of Confined Space

3.1. Confined Space

3.1.1. Confined space means a space that:

3.1.1.1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and

3.1.1.2. Has limited or restricted means for entry or exit; and

3.1.1.3. Is not designed for continuous employee occupancy.

3.2. Permit-Required Confined Space

3.2.1. Permit-required confined spaces (permit spaces) are confined spaces that meet all the characteristics in 3.1.1. and have one or more of the following characteristics:

3.2.1.1. Contains or has a potential to contain a hazardous atmosphere;

3.2.1.2. Contains a material that has the potential for engulfing an entrant;

3.2.1.3. Has an 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; or

3.2.1.4. Contains any other recognized serious safety or health hazard.

3.2.1.5. These spaces include tanks, plenums, sumps, pits, and manholes.

3.2.1.6. Function has conducted an evaluation to determine the presence of confined spaces and posted signs at the entrance of the spaces to alert employees to the potential hazards.

3.2.1.7. An inventory of identified confined spaces for facilities may be found in Appendix A.

4. Reclassification of Permit Required Confined Spaces

4.1. Spaces in which the hazards have been eliminated may be reclassified as non-permit confined spaces for the duration of a specific job.

4.2. Hazards may be eliminated by disconnecting, blinding, and locking out lines that lead to the space; locking out electrical hazards; removing materials in the space that create a hazard; or any other effective means.

4.2.1. Forced air ventilation to control atmospheric hazards is not considered elimination of the hazard.

4.3. The Environmental Health & Safety Department or designee will verify that all hazards and potential hazards have been eliminated and document the reclassification of the space.

4.3.1. Once a space has been re-classified only the "buddy system" is required for entry.

4.4. Re-classification of a space is only valid for the specific job being performed.

4.4.1. Additional tasks must be evaluated on a case-by-case basis and a new reclassification form completed by the EHS Department or designee.

4.5. Should any hazards arise in the space during an entry, all employees must exit the space immediately, the space will no longer be re-classified, and any re-entry must be performed under permit conditions unless the hazards can be eliminated.

5. Confined Space Training

5.1. Training will be conducted prior to an employee's assignment to work involving confined spaces and annually thereafter.

5.1.1. Changes in this program or the hazards associated with the confined spaces will be communicated to employees by way of additional training.

5.2. Awareness Training

5.2.1. Due to the potential for employees to encounter a confined space during the course of their work, awareness training in the

identification of confined spaces and potential hazards is provided to all employees and contractors as part of Function's Safety Program.

5.2.1.1. These individuals are not authorized to enter confined spaces unless they have had additional training in confined space entry as outlined below.

5.3. Confined Space Entry / Safety Attendant / Supervisor Training

5.3.1. All personnel performing work associated with confined spaces shall receive training in confined space entry prior to the commencement of any confined space work.

5.3.2. The content of the training will be determined based on the employee's responsibilities.

5.3.3. As a minimum, each affected employee will receive training on:

5.3.3.1. Hazards associated with confined spaces and their effects

5.3.3.2. Duties and responsibilities appropriate to their assigned role

5.3.3.3. Entry procedures

5.3.3.4. Use of equipment

5.3.3.5. Confined Space Permits

5.3.3.6. Communications procedures

5.3.3.7. Emergency procedures

5.3.3.8. Non-entry rescue procedures

5.3.3.9. Lockout/Tagout (LOTO) procedures

5.3.3.10. Space-specific training on hazards, entry procedures, and LOTO procedures as necessary for the performance of their duties

5.3.3.11. Other information related to specific hazards associated with specific confined spaces as necessary.

6. Program Responsibilities

6.1. Overall Program Responsibilities

6.1.1. The Director of EHS is responsible for the overall implementation of this program and any activities involving confined spaces.

6.2. Confined Space Evaluation

6.2.1. EHS Specialists are responsible for evaluating all locations to determine the presence of confined spaces and permit-required confined spaces.

6.2.2. It is also the responsibility of the EHS Specialist to determine if a permit space can be reclassified as a non-permit space or if alternate entry procedures, such as continuous ventilation, may be used, as per sections 2.3 & 4.3.

6.3. Communication of Hazards

6.3.1. The EHS Specialist is responsible for ensuring that warning signs are posted at the entrance of any identified confined spaces.

6.3.1.1. It is the responsibility of all employees to ensure that posted warning signs remain legible and in place at all times.

6.3.1.2. Deficiencies will be reported to the EHS Specialist for correction.

6.3.2. The EHS Specialist is responsible for ensuring that all employees have received, as a minimum, the confined space awareness training as well as reviewing each space-specific procedure to verify its effectiveness.

6.4. Equipment

6.4.1. Appropriate confined space entry and rescue equipment will be maintained by Function in accordance with manufacturer's directions and this program.

6.4.2. Each employee has the responsibility to fully inspect all equipment prior to each use for excessive wear and operability in accordance with this program and manufacturer's recommendations.

6.4.2.1. Deficient equipment will be immediately removed from service for maintenance or replacement as required.

6.4.3. No confined space entry will be performed without all necessary safety equipment being tested and in good working condition.

7. Duties

7.1. Authorized Entrants

7.1.1. Only those employees who have received confined space entry training will be designated as authorized entrants. Function Inc. maintains a list of employees who have completed this training.

7.1.2. Authorized entrants are required to:
- 7.1.2.1. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure;
- 7.1.2.2. Properly use equipment;
- 7.1.2.3. Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space;
- 7.1.2.4. Alert the attendant whenever:
  - 7.1.2.4.1. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation; or
  - 7.1.2.4.2. The entrant detects a prohibited condition; and
  - 7.1.2.4.3. Exit from the permit space as quickly as possible whenever:
    - 7.1.2.4.3.1. An order to evacuate is given by the attendant or the entry supervisor;
    - 7.1.2.4.3.2. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation;
    - 7.1.2.4.3.3. The entrant detects a prohibited condition; or
    - 7.1.2.4.3.4. An evacuation alarm is activated.

7.2. Safety Attendants
- 7.2.1. Only those employees who have received confined space entry training will be designated as attendants. Function Inc. maintains a list of employees who have completed this training.
- 7.2.2. Attendants are required to:
  - 7.2.2.1. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
  - 7.2.2.2. Be aware of possible behavioral effects of hazard exposure in authorized entrants;
  - 7.2.2.3. Continuously maintain an accurate count 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;

7.2.2.4. Remain outside the permit space during entry operations until relieved by another attendant;

7.2.2.5. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space;

7.2.2.6. Monitor activities outside the space to ensure it is safe. Maintain control of the area and ensure the area is properly barricaded to keep other employees out of the area.

7.2.2.7. Monitor activities inside the space to determine if it is safe for entrants to remain in the space and order the authorized entrants to evacuate the permit space immediately under any of the following conditions:

7.2.2.7.1. If the attendant detects a prohibited condition;

7.2.2.7.2. If the attendant detects the behavioral effects of hazard exposure in an authorized entrant;

7.2.2.7.3. If the attendant detects a situation outside the space that could endanger the authorized entrants; or

7.2.2.7.4. If the attendant cannot effectively and safely perform all the duties required.

7.2.2.8. Summon rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards;

7.2.2.9. Take the following action when unauthorized person's approach or enter a permit space while entry is underway:

7.2.2.9.1. Warn the unauthorized persons that they must stay away from the permit space;

7.2.2.9.2. Advise the unauthorized persons that they must exit immediately if they have entered the permit space; and

7.2.2.9.3. Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space.

7.2.2.10. Perform non-entry rescue; and

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

7.2.3. Under no circumstances will the attendant enter the space unless they:

7.2.3.1. Have been relieved by another attendant,

7.2.3.2. Have the necessary training & equipment, and

7.2.3.3. Have received training in the use of such equipment.

7.3. Entry Supervisors

7.3.1. Only those supervisors who have received confined space entry training will be designated as entry supervisors.

7.3.2. Entry supervisors are required to:

7.3.2.1. Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure;

7.3.2.2. Verify, by checking the actual space to be entered that the appropriate information has been included on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before signing the permit and allowing entry to begin;

7.3.2.3. Terminate the entry and cancel the permit as required;

7.3.2.4. Verify that a rescue team is available and that they have the required number of members available on the shift. Insure that they have been notified of the entry and that a means for summoning them is available;

7.3.2.5. Remove unauthorized individuals who enter or who attempt to enter the permit space during entry operations; and

7.3.2.6. Determine, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

7.3.2.7. Ensure that all open confined spaces have been properly barricaded to keep unnecessary personnel out of the area.

8. Prevention of Unauthorized Entry

8.1. Warning signs are posted at the entrance of all identified confined spaces to prevent unauthorized entry during normal operating conditions.

8.2. During an entry, it is the responsibility of the Safety Attendant to prevent unauthorized personnel from entering the confined space.

8.3. Signs, barricades, barrier tape, or any other effective means shall be utilized to prevent unauthorized entry.

9. Pre-entry Evaluation

9.1. Prior to any entry into a confined space, an evaluation will be made to determine hazards specific to the space to be entered.

9.2. Due to the fact that operations and processes may change, it is important that current conditions as well as historical data be used in evaluating a confined space.

9.2.1. A review of historical data may reveal previously unidentified hazards such as flooding potential or electrical linkages.

9.2.2. It may also indicate hazards associated with operations taking place elsewhere in the plant.

10. Isolating the Confined Space

10.1. Isolation will be performed to control internal and external hazards which may result from pipes, ducts, equipment, etc.

10.2. Any or all of the following means may be used to isolate the space.

10.2.1. Blanking or blinding of pipes or flanges;

10.2.2. Misaligning or removing sections of lines, pipes, or ducts;

10.2.3. Double block and bleed;

10.2.4. Lockout/Tagout of all sources of energy;

10.2.5. Blocking or disconnecting all mechanical linkages.

11. Preparing for Confined Space Entry

11.1. Once isolation of hazards has been completed, the following steps will be utilized to prepare the space for entry:

11.2. Atmospheric Testing

11.2.1. Atmospheric testing will be conducted to determine the presence of airborne hazards. As a minimum, testing will be conducted in the order given for:

11.2.1.1. Oxygen content ($19.5\% < O_2 > 23.5\%$)

11.2.1.2. Flammable Gasses and Vapors (>10% LEL / LFL)

11.2.1.3. Toxics

11.2.1.3.1. Hydrogen Sulfide (>10 ppm)
11.2.1.3.2. Carbon Monoxide (>10 ppm)
11.2.1.3.3. Other as applicable

11.2.2. Additional monitoring may be required based on the history and previous contents of the space to be entered.

11.2.3. Work activities may introduce atmospheric hazards into the confined space. For example, fumes from hot work and vapors or mists from painting.

11.2.4. Monitoring for substances specific to these and other activities will be conducted as necessary.

11.2.5. Testing Considerations

11.2.5.1. It is important to understand that some gasses or vapors are heavier than air and will settle to the bottom of a confined space.

11.2.5.2. Also, some gasses are lighter than air and will be found around the top of the confined space.

11.2.5.3. It is necessary to test all areas (top, middle, bottom) of a confined space with properly calibrated testing instruments to determine what gasses are present.

11.2.5.4. Contaminant levels can vary laterally through large confined spaces such as tunnels and testing shall be conducted accordingly.

11.2.5.5. Testing should be continuous during entry operations and recorded at least every 30 minutes.

11.2.6. Calibration

11.2.6.1. The EHS Department will ensure that test equipment is calibrated in accordance with the manufacturer's recommendations.

11.2.6.2. Field checks, also known as "bump" testing, will be conducted each time the equipment is used by the personnel entering the space.

11.2.6.2.1. Bump tests will be conducted in a clear air environment.

11.3. Ventilation

11.3.1. Mechanical ventilation should be used during confined space preparation and entry whenever atmospheric testing indicates potential oxygen deficiency or the presence of airborne hazards.

11.3.1.1. Mechanical ventilation may include a fan or blower alone or attached to a trunk hose, but must be sufficient to maintain a clear atmosphere in the space, but may also include any other device that is demonstrated to provide sustained and adequate ventilation during atmospheric monitoring and testing.

11.3.1.1.1. In preparing a confined space for entry, gasses that are heavier than air (H_2S, Cl_2) should be ventilated by pulling air from the bottom of the space. Gasses that are lighter than air gasses (methane) should be ventilated by pulling air from the top of the space.

11.3.2. During the course of confined space entry work, it is important that mechanical ventilation continues throughout the entire time individuals are in the confined space.

11.3.2.1. It is possible for a hazardous atmosphere to form again if the air flow is or becomes insufficient.

11.3.2.1.1. This is particularly true when work performed in the confined space may generate a hazardous atmosphere (welding, use of solvents, operation of internal combustion engines).

11.3.3. Ventilation should be directed to ventilate all areas where an employee is or will be present.

11.3.4. For individuals working near the bottom of a confined space, mechanical ventilation should normally pump air from a fresh air source <u>into</u> the bottom of the space, pushing air <u>out</u> at the top of the space.

11.3.5. It is essential when setting up the confined space ventilation that:

11.3.5.1. The source of “fresh air” coming into the confined space is demonstrated to be clean and remains clean at all times.

11.3.5.2. The mechanical ventilator does not block a critical exit.

11.3.5.3. **<u>Pure oxygen shall not be used to ventilate the space</u>.**

11.3.5.4. Air exhausted from the space does not create a hazard for employees working in other areas.

11.3.6. Airline respirators with escape packs or self-contained breathing apparatus (SCBAs) will be used whenever the potential for an atmosphere that is immediately dangerous to life and health (IDLH) exists regardless of the use of mechanical ventilation.

12. **Other Personal Protective Equipment**

12.1.1. Safety harnesses with lifelines attached **must** be worn by each individual who enters a permitted confined space.

12.1.1.1. Lifelines shall attach either at the center of the entrant's back near shoulder level or above the entrant's head.

12.1.1.2. In the event the continued wearing of the lifelines while inside the confined space creates a safety hazard, Functions EHS Department must be contacted **before** entry into the confined space.

12.1.1.3. For space's which must be entered through a top opening, a hoisting device or other effective means shall be provided for lifting employees out of the space.

12.1.1.4. Safety Belts do not meet the requirements for this section.

12.1.2. Respiratory protection and other personal protective equipment will be designated in each space-specific procedure.

12.1.3. Downgrading of any personal protective equipment may only be done with the approval of Functions EHS department.

12.1.4. A designated Safety Attendant must be stationed at the entrance to a permitted confined space.

12.1.4.1. It is the responsibility of the Safety Attendant to be present at the entry of the confined space and in contact with the entrant at all times during the entry.

12.1.4.2. The Safety Attendant is responsible for calling for assistance in the event of an emergency.

12.1.4.3. If the space contains an IDLH (immediately dangerous to life and health) atmosphere, a standby person equipped with sufficient rescue equipment must be present at all times during the entry.

12.1.4.4. If the entrant will be out of the line-of-sight of the Safety Attendant, an effective means of communication, typically a radio, between the entrant and the Safety Attendant must be established.

12.1.4.5. All affected personnel shall be trained in the use of the communication system and the system shall be tested before each use to confirm its effective operation.

12.1.5. Other personal protective equipment necessary to perform work inside the confined space will be utilized.

13. Confined Space Entry Permit

13.1. The purpose of the Confined Space Entry Permit is to ensure that the confined space has been prepared for safe entry, and to document this effort.

13.2. Entry permits are valid for the duration specified on the permit.

13.3. The preparation phase of the confined space entry is not complete until:

13.3.1. There is assurance that the confined space is empty and devoid of hazardous materials to the extent possible.

13.3.2. Lockout/tagout procedures have been completed and checked.

13.3.3. Atmospheric testing has been completed and the confined space is properly ventilated.

13.3.4. All necessary personal protective equipment is available.

13.3.5. Safety harnesses and lifelines are available.

13.3.6. A safety attendant has been established at the entrance of each confined space and any additional communications equipment is operational.

13.3.7. All other safety precautions necessary to support the type of work to be performed while inside the confined space have been anticipated and safety contingencies have been satisfied prior to entry (i.e. hot work permits).

13.3.8. The Entry Supervisor shall be responsible for issuing the permit once the above conditions have been met.

13.3.9. Once the permit has been issued any questions or concerns will be reviewed with the entrant(s) and the attendant.

13.3.10. The permit will then be posted at the entrance to the confined space.

13.3.11. At the completion of all work, completed Confined Space Permit is then returned to the supervisor and forwarded to the EHS department immediately following the expiration of the permit.

13.4. Whenever responsibility for a permit space entry changes, the relieving entry supervisor will review the existing permit and assume responsibility for

maintaining the integrity of all safety precautions in the confined space by issuing a new permit.

13.5. Responsibility for an entry will not be transferred.

13.5.1. Any changes in the conditions of the existing permit that are required, including personnel changes, will immediately expire the active permit.

13.5.1.1. A new permit process must be completed that designates the changes necessary to the scope of work, hazards, personnel, PPE, Etc.

13.6. The following circumstance will render a Confined Space Entry Permit invalid:

13.6.1. Work is interrupted for an appreciable duration (no greater than 15 minutes).

13.6.2. The time specified on the Permit is reached.

13.6.3. Any type of incident or issue occurs in the Permit area.

13.6.4. Unauthorized use of flame, spark, or other source of ignition within the confined space occurs.

13.6.5. Any other circumstances whereby there is a reason to believe that the safety of the entry is threatened.

13.6.6. The work is completed.

13.6.7. The absence, removal, or failure of the safety attendant, communication system, lifelines, or other personal protective equipment.

13.6.8. Removal or failure of the ventilation system.

13.6.9. Conditions have changed significantly from Permit requirements.

13.6.10. An employee becomes injured or ill while working within the confined space.

13.6.11. A power failure occurs and lighting or ventilation equipment are inoperative.

13.6.12. Severe weather conditions such as high winds, lightning, or rain are imminent and can affect the confined space, or the confined space temperature and humidity may cause heat or cold stress.

13.6.12.1. This will include permits issued to indoor spaces.

13.6.13. The rescue team is activated for any reason.

13.6.14. The rescue team is called to another entry to respond to an emergency.

13.7. Under any of these circumstances, work shall be halted and all personnel shall leave the permitted confined space.

13.7.1. Work shall not resume until a new permit is issued.

14. Entering the Confined Space

14.1. Only after the confined space has been properly isolated, prepared for safe entry, and a Permit issued and posted will the confined space be ready for entry.

14.1.1. Step-by-step procedures for entry into the various types of spaces are contained in Appendices B & C.

14.2. No employee will enter any confined space before reviewing the space-specific entry procedure and the Confined Space Entry Permit to ensure it is valid. No employee will enter any confined space without an attendant being present.

14.3. Tanks, vessels, or other confined spaces with side and top openings shall be entered from side openings when practical.

15. Standby / Rescue

15.1.1. The entry supervisor shall verify the availability of a rescue team prior to any activities associated with a confined space.

15.1.2. The entry supervisor will communicate the location of the space, the nature of the work, the number of entrants, the approximate time and duration of the entry, and any known hazards to the rescue team.

15.1.2.1. This may be accomplished by providing a copy of the entry permit to the rescue team.

15.1.3. The entry supervisor will also ensure that the means of summoning the rescue team is operable and that the attendant is knowledgeable in implementing them.

15.1.4. Non-entry rescue will be attempted whenever possible.

15.1.5. 13.1 Rescue Team

15.1.5.1. Should a Permit required Confined Space be performed onsite local rescue agencies shall be notified and should be confirmed to have an adequate team available at the time of the Permit Required Confined Space Work.4

16. Alternative Procedures

16.1. When the only potential or actual hazard in a confined space is atmospheric and the hazard can be controlled by continuous ventilation, alternative entry procedures may be used.

16.2. In order to utilize the alternative procedures, there must be monitoring and inspection data supporting the absence of any non-atmospheric hazards and the effectiveness of the continuous forced air ventilation. Periodic air monitoring during the entry is also required.

16.3. Function's EHS Department will be consulted on any spaces that may qualify for alternative entry procedures. Function's EHS Department will complete a written certification verifying that the space is safe for entry using alternative entry procedures and specifying the frequency of air monitoring.

17. Non-Function Employees

17.1. All contractors receive confined space awareness training alerting them to the presence and hazards of confined spaces as part of the Function's Safety Program. The Project Coordinator is responsible for notifying Function's EHS Department should it become necessary for a non-Function employee to enter a confined space. Functions EHS Department will ensure that:

17.1.1. Contractors have received the appropriate confined space entry training for their level of involvement; and shall review the contractor CSE program. In the event that the contractor does not have a CSE Program or that program does not meet the requirements of Revere CSE Program.

17.1.2. Employees are familiar with this Program and plant entry procedures. Any deviations between this program and the contractor's program will be addressed prior to any entry procedures;

17.1.3. The rescue team has been notified that an entry by non-Function employees is taking place; and

17.1.4. Entry is conducted in accordance with this Program and any other applicable policies.

18. Disciplinary action

18.1. This program is mandatory for all employees of Function, Inc. Failure to comply with this program will lead to disciplinary action up to and including discharge. The safety of the employee will be the primary concern in complying with this policy and this concern will not be substituted for convenience.

18.2. Meeting the objectives of this policy will ensure compliance with all Occupational Safety and Health Administration (OSHA) requirements as they relate to confined space entry.

19. Recordkeeping / Review

19.1. All permits will be kept for a minimum of three (3) years from their date of issuance.

19.2. Canceled permits will be reviewed as they are turned in.
19.3. This program will be reviewed at least annually.
19.4. Additional program reviews will be conducted any time one of the following occurs:
19.4.1. Any unauthorized entry of a permit space;
19.4.2. Detection of a permit space hazard not covered by the permit;
19.4.3. Detection of a condition prohibited by the permit;
19.4.4. Occurrence of an injury or near-miss during entry;
19.4.5. Change in the use or configuration of a permit space; and
19.4.6. Employee complaints about the effectiveness of the program.

20. APPENDIXES

20.1. Appendix A: FOB-EHS-002-A CONFINED SPACE ENTRY PERMIT
20.2. Appendix B: FOB-EHS-002-B JOB SPECIFIC CONFINED SPACE RE-CLASS
20.3. Appendix C: FOB-EHS-002-C Confined Space Inventory
20.4. Appendix D: FOB-EHS-002-D Confined Space Rescue Team Info (Reserved)

21. Document Review and Approval

21.1. Date Devised: 4-19-2019
21.2. Reviewed Date: 07-21-2021
21.3. Date Approved: 05-07-2021
21.4. Approved By: Ed Noter, Director, EHS