GRAY & SON/MARYLAND PAVING

CONFINED SPACE ENTRY PROGRAM

PURPOSE:

It is the policy of G&S/MPI to ensure that our employees are protected from the potential hazards involved in entering confined spaces. We will make every effort to comply with the OSHA Permit-Required Confined Space Standard (CFR 1910.146) and to exceed those requirements when necessary to ensure the safety of our workers.

For the purposes of this program the following definitions will apply:

* Confined Space - A confined space has limited or restricted means of entry or exit, is large enough for an employee to enter and perform assigned work, and is not designed for continuous occupancy by the employee. These spaces may include, but are not limited to, underground vaults, manholes, tanks, storage bins, pits and diked areas, vessels, and silos.

* Permit-Required Confined Space - A "permit-required confined space" is one that meets the definition of a confined space and has one or more of these characteristics: (1) contains or has the potential to contain a hazardous atmosphere, (2) contains a material that has the potential for engulfing an entrant, (3) has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section, and/or (4) contains any other recognized serious safety or health hazards.

ENTRY INTO PERMIT REQUIRED CONFINED SPACES:

Prior to entry into any permit-required confined space, the supervisor will issue a permit that specifies the location, type, and duration of the work to be done, and the date. The permit will certify that all existing hazards have been evaluated by the supervisor and that necessary protective measures have been taken for the safety of workers. It will provide documentation of the atmospheric testing that has been done. It will assign entry and attendant duties to specific persons.

Before issuing an entry permit, the supervisor will be responsible for the following:

* Identify all hazards and potential hazards associated with the confined space, such as the danger of explosion, asphyxiation, toxic gases/fumes, engulfment or entrapment, electrical or mechanical hazards, etc.

* Isolate the space from potential hazards, if possible, to provide for safe entry.

* Purge, inert, flush, ventilate to eliminate atmospheric hazards.

* Provide external barriers and warning signs.

* Perform pre-entry oxygen, flammable gas and toxicity air tests. All test results are to be recorded on the entry permit. If potential hazards cannot be isolated, continuous monitoring is required. If potential hazards can be isolated, periodic monitoring is required.

* Provide at least one trained attendant outside of each confined space that will be entered.

* Ensure that rescue and emergency services and equipment are in place as noted in this policy.

* Ensure that all required equipment is provided, maintained and properly used. This includes air monitoring equipment, forced air ventilation equipment, communications equipment, personal protective equipment (PPE), and lighting, external barriers and warning signs, ladders, and rescue equipment.

If hazardous conditions are detected during entry, employees will immediately leave the space and the supervisor will determine the cause of the hazardous atmosphere and take corrective actions before allowing re-entry.

RESCUE & EMERGENCY SERVICES:

If proper protective measures are taken to eliminate and control any possible hazards in the confined space(i.e., ventilation, purging, monitoring, lockout/tagout, etc.), rescue operations should not be necessary. Nonetheless, we must be prepared for the worst case scenario.

In the case of a confined space emergency, please call 911.

TRAINING:

Employees involved with permit-required confined space work will be trained to assure the knowledge, understanding, and skills necessary for the safe performance of their duties. Foremen will be trained in the identification and evaluation of confined space hazards and in the proper precautions to be taken to assure safe entry and work in confined spaces. Employees entering confined spaces will be trained in the hazards and potential hazards involved and how to protect themselves from those hazards. They will be trained to never enter a confined space until a permit is issued and they have been authorized to enter by the foreman. Attendants will be trained in their duties and responsibilities and the actions to be taken in the event of an emergency.

ENTRY PERMITS:

Entry permits are to be posted at the entrance to the confined space. See attached copy of the Entry Permit to be used by the foreman. Copies of all completed and /or canceled entry permits will be retained for one year after completion of an entry.

SUBCONTRACTORS:

Subcontractors to G&S/MPI will be required to submit written policies and procedures for entry into permit-required confined spaces that are at least as stringent as our policies and procedures. Entry into confined spaces by the subcontractors must be coordinated with and approved by the supervisor in charge of the confined space.

Subcontractors will be responsible for providing all training, equipment, testing, personnel and emergency services, and permits for entry into confined spaces by their employees. G&S/MPI will notify subcontractors of confined space hazards, entry requirements, and history of hazards in the confined spaces involved.

In cases where our employees and those of subcontractors may be entering the same confined spaces or where operations of subcontractors may impact the hazards involved in the confined spaces we must enter, the supervisor will coordinate our efforts and protective measures with those of the subcontractors.