

<p style="text-align: center;">Notice to Contractors Servicing Municipal Compactors Regarding OSHA Requirements for Permit Required Confined Spaces and Control of Hazardous Energy (Lock-Out/Tag-Out)</p>

Overview - This notice is provided to inform your company of requirements when servicing compactors at municipal transfer stations under the following two OSHA standards:

1. 1910.146 - Compactors must be managed as a Permit Required Confined Space (PRCS).
2. 1910.147 - Hazardous energy must be controlled through the Lockout/Tagout (LO/TO) process.

Programs that meet these requirements help prevent employees and contractors from being injured by the following types of hazards posed by compactors:

- “engulfed” by materials inside the compactor
- “struck-by” or “pinched” or “crushed” by materials or equipment inside compactor
- “trapped” by materials or equipment inside the compactor

OSHA Requirements and Roles and Responsibilities - Lockout/Tagout (LO/TO) and Permit-Required Confined Space (PRCS)

Town Responsibilities as the Host/On-Site Employer:

1. Lockout/Tagout (LO/TO) Procedures

- Communicate to Town employees:
 - Prohibition of employees entering or conducting work on the compactors that require de-energization through the LO/TO process.
 - Prohibition of employees operating compactors that have been LO/TO to ensure no accidental activation or energy release occurs during servicing.
 - Notification when each compactor will be LO/TO and when employees can resume compactor operation.
- Communicate to Contractor:
 - Requirements for the contractor to have a LO/TO program, employees trained and authorized to implement the LO/TO program, and locks and tags.
 - The Town’s LO/TO procedures for Town compactors and an agreement with the contractor on the LO/TO procedure to be used by the contractor.
 - Requirements for contractor to coordinate the scheduling of any work requiring LO/TO with the Town’s representative.

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Town Responsibilities, Continued:

2. Permit-Required Confined Space (PRCS) Procedures

- Communicate to employees:
 - Employee Restrictions – They are prohibited from entering the compactors, classified as a PRCS, due to recognized hazards.

PRCS Signage - We have posted a sign on or near the compactors to ensure that employees and contractors know the PRCS classification and entry prohibitions. The sign clearly states:

“*Danger, Permit Required Confined Space, Do Not Enter.*”
- Communicate to Contractor:
 - The compactor is a PRCS, and the type of hazards that qualify it as a PRCS.
 - The methods used to work on the compactor will determine compliance requirements under OSHA Standard 1910.146 for a confined space program, if any. The methods to work on the compactor are categorized into three options, (defined page 3).
 - Requirements for contractor to coordinate all PRCS-related activities with the Town.

Contractor Responsibilities – Please note that the LO/TO and PRCS programs involve more responsibilities than listed below. The guidance below highlights essential responsibilities when coordinating with the Town.

1. Lockout/Tagout (LO/TO) Program – this involves at a minimum:

- Having an OSHA-compliant Lock-Out/Tag-Out Program, which requires trained “authorized” employees to lock out/tag out the energy sources before entering the compactor.
- Communicating and coordinating with the Town to:
 - Identify locations of all compactor shutoffs (that should be clearly labeled).
 - Agree on the LO/TO procedures the contractor will use for each compactor.
 - Communicate the LO/TO schedule to enable the Town to notify employees.
 - Debrief the Town during (if needed) and at the end of LO/TO procedures regarding any hazards found or created while conducting operations.

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Contractor Responsibilities, continued:

2. **Permit-Required Confined Space (PRCS) Procedures** – There are three options for working on the compactor as a PRCS. PRCS compliance requirements are based on the option selected:

1. **Alternative Procedures for Entry**: This refers to permit spaces with an actual or potential hazardous atmosphere as their only hazard.

Notes:

- a. The situation at the transfer station for the compactor that fits this option is when “All Work is Conducted From Outside” (the space's exterior).
- b. Training is required for personnel conducting the alternative procedures.
- c. A written PRCS Program is not required for this option.

2. **ALL Hazards Can Be Removed Before Entry**: OSHA refers to this option as a "Reclassification" of a PRCS to a non-permit confined space. It is allowed when there are no actual or potential atmospheric hazards and if all other hazards within the space can be eliminated without entry into the space.

Detaching the container from the compactor prior to servicing the compactor fits into this option. Responsibilities include:

- Coordinating with the Town’s PRCS Supervisor (competent person) to complete a *Temporary Reclassification Permit* (1910.146 (c)(7)(iii)). You must follow the guidelines in this *Temporary Reclassification Permit*. Please see the *Temporary Reclassification Worksheet* at the end of this notice.
- Locking and tagging out the compactor, which requires having a LO/TO Program. Please see the requirements in the section above.
- Training employees to follow the procedures in the *Temporary Reclassification Permit*.

Notes:

- a. Once the work is completed, the container is reattached, and the locks and tags removed, the classification reverts to a PRCS classification.
- b. Entry must **not** be required to verify elimination of all the hazards. If entry is needed to eliminate or verify the elimination of a hazard, then a full PRCS Program is required. Once it has been determined that all the hazards have been eliminated, the space can be reclassified.
- c. Air Testing **is not necessary** in this scenario.

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3. Hazards Can Be Controlled But Not Eliminated Before Entry

This means that even after electrical power and other energy sources are locked out and tagged out, a toxic hazard might still exist inside the space. Compactors meeting this criterion must follow a full PRCS Program.

Note: A written PRCS Program is different than an entry permit:

- a. A written PRCS Program - is a guidance document for employers to develop procedures and employees to use for safe entry into a permit space.
- b. An entry permit - is a checklist of required tasks that ensures all the steps for safe entry have been taken prior to entry.

At a minimum, a full PRCS Program requires contractors to meet the following responsibilities:

- Inform the Town of the PRCS Program that will be utilized.
- Obtain and document information on the hazards of the permit space and information from any previous entry operations from the Town.
- Generate entry permits from your PRCS program prior to employee entry into the PRCS:
 - The permit should identify and address physical and atmospheric hazards, and specify control of hazards through elimination, control, safe work practices, or use of PPE.
 - You must maintain all permit-related paperwork.
 - Note: this is **different** than the *Reclassification Permit*.
- Determine if the Town's employees will work in or near the space during the entry operations. If so, you must coordinate with the Town's PRCS Supervisor (competent person) to inform the employees when the contractor will work inside the PRCS.
- Debrief with the Town PRCS Supervisor (competent person) during (if needed) or at the end of any entry operations regarding any hazards they found or created during entry operations.

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**CONFINED SPACE - TOWN TRANSFER STATION
TEMPORARY RECLASSIFICATION WORKSHEET**

Reclassification of the Permit-Required Confined Space (PRCS) is allowed when all hazards can be eliminated without entering the space. There can be no actual or potential atmospheric hazards. OSHA requires that the following information be documented before entry under Reclassification is conducted.

This form is to be completed by the Town's Confined Space Supervisor.

SPACE IDENTIFICATION: _____

TASK: _____

HAZARD ELIMINATION:

	YES	<u>NO</u>	<u>N/A</u>
<input type="checkbox"/> Engulfment: material removed?	_____	_____	_____
<input type="checkbox"/> Electrical: locked and tagged out?	_____	_____	_____
<input type="checkbox"/> Hydraulic: locked out and blocked?	_____	_____	_____

Note: If the answer to any of these questions is no, it cannot be reclassified, and entry is not allowed unless a full PRCS program with a permit is implemented.

ACCEPTABLE AIR LEVELS CONFIRMED – not required for compactors.

PROCEDURE:

- If hazards arise during entry, evacuate immediately.
- If hazards arise, use a Full Confined Space Program with a Permit.

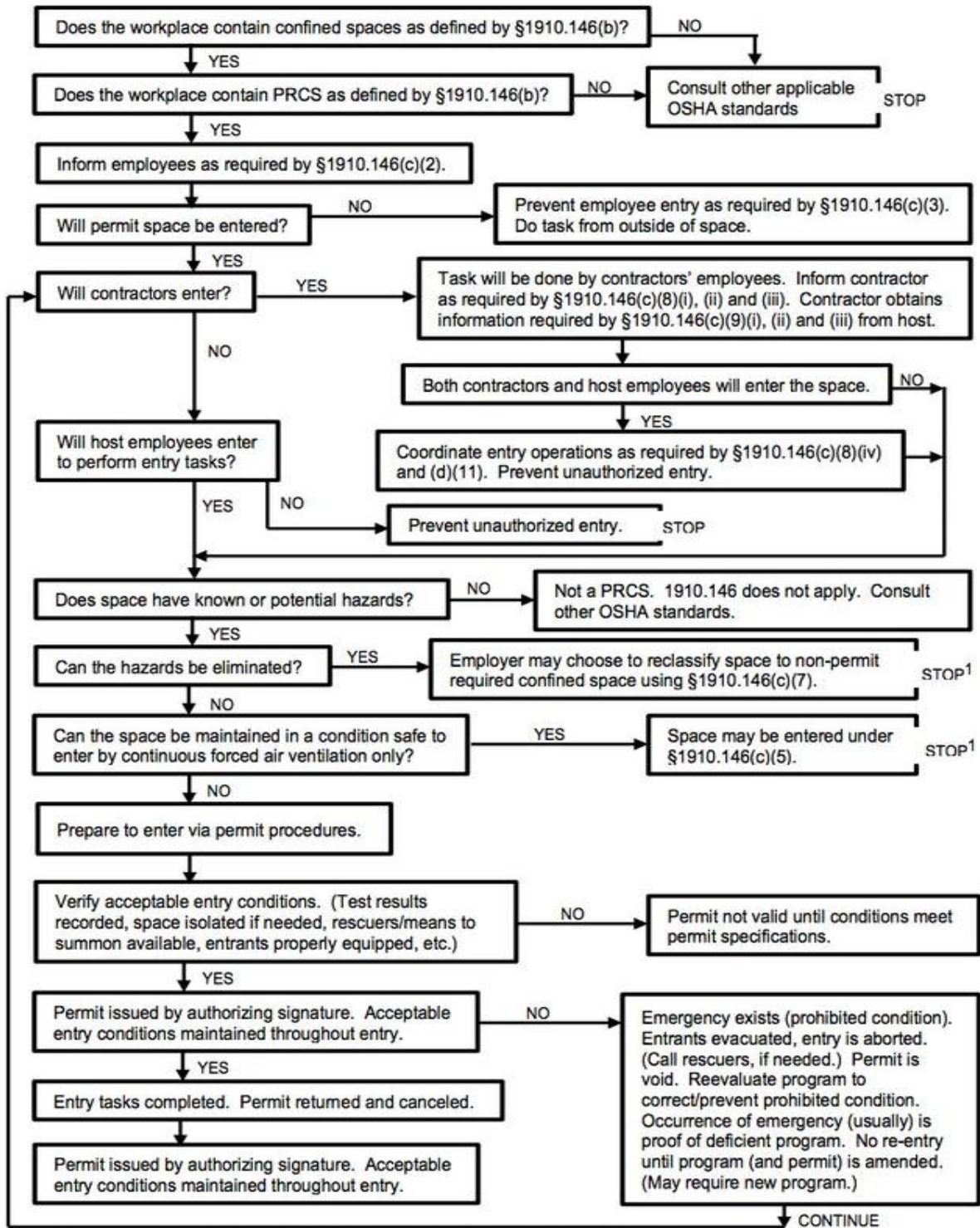
Provide this completed worksheet to all entrants and attendants before entry.

Signature of the Town Confined Space Supervisor (Competent Person) Date

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Appendix A to § 1910.146

Permit-Required Confined Space Decision Flow Chart



¹ Spaces may have to be evaluated and re-evaluated if hazards arise during entry.