

**Ameritube LLC**  
**1000 N. Hwy 77, Hillsboro TX 76645**

Revision Level:  
A

Procedure No.  
SM-104

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## Confined Spaces Program

<i>Date</i>	<i>Description Of Change</i>	<i>Signature</i>	<i>Rev. Level</i>
<i>07/20/2015</i>	<i>Initial Release</i>	<i>Quality</i>	
<i>09/16/2023</i>	<i>Revised to Add Aron Garcia as HR and Safety Manager</i>	<i>Gary Ravitsky</i>	<i>A</i>

Procedure Approval:

Company Title:  
Quality Manager

Date:  
08/15/2017

## Confined Spaces Program

### 1. Purpose

- a. This Confined Spaces Program establishes procedures and responsibilities for identifying, evaluating, entering, and working in confined spaces at Ameritube LLC. It is designed to protect employees from hazards associated with confined space entry and to ensure compliance with OSHA's Permit-Required Confined Spaces standard (29 CFR 1910.146).

### 2. Scope

- a. This program applies to all Ameritube LLC employees and contractors who may be required to enter or work in confined spaces or permit-required confined spaces (PRCS) at the Hillsboro, TX facility.

### 3. Definitions

- a. Confined Space: A space that is large enough to enter, has limited means of entry/exit, and is not designed for continuous occupancy.
- b. Permit-Required Confined Space (PRCS): A confined space with one or more of the following hazards:
  - Hazardous atmosphere
  - Engulfment hazard
  - Inwardly converging walls or floors that could trap
  - Other recognized serious safety or health hazards

### 4. Responsibilities

- a. Program Administrator: Maria Muniz, Production Manager
  - Maintains the confined space inventory and classification
  - Oversees training, entry procedures, and documentation
  - Ensures permits are used and completed properly
- b. Supervisors:
  - Ensure entry procedures are followed
  - Verify atmospheric testing and controls are in place
- c. Authorized Entrants:
  - Follow procedures and use PPE
  - Communicate with the attendant
  - Exit space when required
- d. Attendants:
  - Monitor entrants and conditions
  - Maintain communication
  - Initiate rescue procedures if necessary
- e. Entry Supervisors:
  - Verify space safety, permit completion, and termination
  - Ensure rescue procedures are in place

### 5. Confined Spaces Inventory

## Confined Spaces Program

- a. All spaces at Ameritube LLC are assessed and classified as:
  - Non-permit confined spaces
  - Permit-required confined spaces
- b. Examples of confined spaces:
  - Pickling tanks and pits
  - Chemical storage tanks
  - Enclosed ducts or vaults
- c. The inventory is maintained by the Program Administrator and reviewed annually.

### 6. Permit System

- a. A written entry permit must be completed before entering a PRCS. The permit includes:
  - Date, location, and description of the space
  - Names of entrants, attendants, and supervisor
  - Hazards and control measures
  - Atmospheric test results
  - PPE and rescue equipment required
  - Communication procedures
  - Time of entry and exit

### 7. Atmospheric Testing

- a. Prior to entry, the atmosphere will be tested for:
  - Oxygen content (19.5%–23.5%)
  - Flammable gases/vapors (<10% LEL)
  - Toxic gases (e.g., CO, H<sub>2</sub>S)
- b. Testing will be done with calibrated, direct-reading instruments by trained personnel.

### 8. Hazard Controls

- a. If hazards are identified, appropriate controls must be implemented before entry:
  - Ventilation
  - Isolation (lockout/tagout)
  - PPE (respirators, harnesses)
  - Barriers and signage
  - Continuous monitoring when required

### 9. Entry Procedures

- a. Evaluation of the space
- b. Completion of the entry permit
- c. Atmospheric testing
- d. Use of required PPE and tools
- e. Assigning attendant and supervisor
- f. Constant communication with the attendant
- g. Immediate evacuation if hazardous conditions develop

### 10. Rescue and Emergency

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- a. Rescue procedures must be in place for every PRCS entry. Options include:
  - On-site trained rescue team with equipment
  - Local emergency services with response agreement
- b. Rescue equipment includes:
  - Tripods, harnesses, retrieval systems
  - SCBA or supplied air respirators
  - First aid supplies
- c. Attendants must not enter the space. Emergency services must be contacted immediately.

### 11. Training

- a. Employees are trained based on their roles:
  - i. Entrants: Hazards, procedures, PPE, communication
  - ii. Attendants: Monitoring duties, rescue protocols
  - iii. Supervisors: Permit authorization, hazard evaluation
- b. Training occurs:
  - i. Before initial assignment
  - ii. When duties or procedures change
  - iii. When new hazards are introduced
  - iv. If deficiencies are identified

### 12. Recordkeeping

- a. Permits – Retained for 1 year
- b. Training records – Minimum 3 years
- c. Testing and calibration records – Per manufacturer/OSHA guidelines

### 13. Program Review

This program will be reviewed annually by Maria Muniz or following any incident, regulatory change, or significant process modification involving confined spaces.