

Attic & Crawlspace Entry Procedures

1. INTRODUCTION

Attic and crawlspaces typically fit the definition of confined spaces, however rarely as permit spaces. These procedures outline entry requirements for work conducted in attic and crawlspaces. (For permit spaces, please see the <u>UO Confined Space Safety Program</u>.)

2. AUTHORITY

The University of Oregon (UO) is committed to maintaining a safe and healthy work environment for all employees. These safety procedures were developed under the authority of <u>University Policy IV.05.01 Safety – Physical Space and Environment</u>, which requires regulatory compliances, defines responsibilities, provides for immediate suspension of certain unsafe activities, and guides corrective action procedures for recognized hazards.

University Human Resources policies, and employment contracts provide separate requirements on employee performance management and corrective action.

3. SCOPE

This program applies to all UO employees and contractors who conduct work in attics and crawlspaces on UO properties. These procedures are only for work in attics and crawlspaces where the work being conducted does not introduce any new hazards. If hazards are introduced into attics and crawlspaces, the UO Confined Space Safety Program will apply.

4. RESPONSIBILITIES

a. Departments

Departments are responsible for:

- 1. Identifying employees who will work in attics and crawlspaces.
- 2. Ensuring that employees working in attics and crawlspaces receive training on these procedures as well as Confined Space Entry & Attendant training.

b. Environmental Health and Safety

Environmental Health and Safety (EHS) Department is responsible for:

- 1. Regularly reviewing and updating this procedure.
- 2. Including this procedure in Confined Space Entry & Attendant training.
- 3. Evaluating spaces to determine if they should be upgraded to permit spaces.
- 4. Maintaining the list of permit required spaces on UO properties.
- 5. Providing safety consultations to campus partners upon request.

c. Contractors

Contractors are responsible for:

1. Communicating if the work they will be doing will create permit conditions in the space.

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- **2.** Following their company safety programs for working in attic and crawlspaces.
- **3.** Following their company safety programs for working in permit required confined spaces, if needed.
- **4.** Providing documentation to UO upon request; training files, permits, air monitoring data, etc.

5. PROCEDURES

a. A minimum of two people are required to enter attics and crawlspaces. Unless the space is determined to be a permit space, both employees will be allowed to enter at the same time.

NOTE: It is permissible to have a person working alone in an attic or crawlspace provided they communicate their exact location and expected duration of the work prior to entry and check out immediately upon exit. This communication may be via radio or cell phone.

- **b.** Confirm that the work being conducted in the space will not create a hazard to employees working in the space. Work that could create hazards includes, but is not limited to:
 - 1. Hot work
 - 2. Electrical work
 - **3.** Work that could create a hazardous atmosphere such as painting, spraying insulation, chemical use, etc.
 - **4.** Work that creates elevated dust levels, such as using blowers, compressed, or other tools that create dust or disturb the air.
 - **5.** Work that limits the ability of the employees to quickly evacuate the area. (Tools or equipment that create trip hazards, block egress, etc.)
- **c.** Prior to entry, evaluate the space for any unusual conditions that could create a hazard. Look for:
 - 1. Standing or running water
 - 2. Unusual odors (natural gas, sewage, chemical, burning, etc.)
 - 3. Evidence of broken steam line
 - **4.** Evidence of significant rodent activity; specifically, the presence of feces that cannot be avoided while conducting the work
 - 5. Configurations that could create entrapment
 - 6. Visible damage to suspected asbestos containing materials
 - $\textbf{7.} \ \ \textbf{Any other recognized concerns}$
- **d.** If it is confirmed that work in the space will not introduce a hazard and no unusual conditions are noted, determine what safety equipment is required for safe entry. A radio or cell phone are required by entrants. Other PPE and equipment (hard hat, knee pads, gloves, flashlight, etc.) may also be required, based on evaluation of the space.



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- **e.** When the safety equipment has been acquired, and employees working alone have made notification (if applicable), employee(s) may proceed with the entry to conduct the work.
- **f.** During entry, be alert for any changes in conditions or hazards that were not noted when evaluating the space prior to entry. If any hazards are noted, exit the space immediately and contact Environmental Health & Safety (EHS) to request an evaluation or permit for a permit required entry.

6. TRAINING

- **a.** Training on these procedures are required prior to entry into attics and crawlspaces.
- **b.** Refresher training will be provided:
 - **1.** When there is a change in the program.
 - 2. When review of an entry identifies problems with the entry.
 - **3.** When there is a deviation from established procedures or an employee's knowledge of the procedures is inadequate.

7. **DOCUMENTATION**

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