



GENERAL CONFINED SPACE ENTRY

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Safety Manager
Coosa Pines Operations

DATE

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August 2, 2024

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DATE

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1. PURPOSE

The purpose of this policy is to: (1) protect employees, contractors, and visitors from the hazards associated with Entry* into permit -required confined spaces at the Coosa Pines Mill, and (2) state the requirements for Entry into permit-required confined spaces for employees, contractors, and visitors of the Coosa Pines Mill.

2. SCOPE

This policy applies to all operations at the Coosa Pines Mill. Strict observance of this policy is a necessary part of accident and injury prevention. This policy is written using OSHA guidelines and in accordance with the definition of a permit-required confined space in OSHA 29 CFR Parts 1910.146, Permit-Required Confined Spaces for General Industry which reads:

Permit-required confined space (permit space) means a confined space that has one or more of the following characteristics:

- 2.1 Contains or has the potential to contain a hazardous atmosphere;
- 2.2 Contains a material that has the potential for engulfing an entrant;
- 2.3 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
- 2.4 Contains any other recognizable serious safety or health hazard.

*Entry means the action by which a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.



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3. RESPONSIBILITY

3.1 Implementation

This General Confined Space Entry Policy was developed by the Coosa Pines Mill and encompasses the following 14 implementation steps. It is the responsibility of Coosa Pines Operations to perform these 14 steps to comply with OSHA 29 CFR Parts 1910.146, Permit-Required Confined Spaces for General Industry. This written program is available for inspection by employees and their authorized representatives in the Safety Procedure Files on the Mill Portal. These implementation responsibilities include:

- 3.1.1 Evaluating the workplace for permit spaces.
- 3.1.2 Informing employees of dangers by posting signs at permit spaces.
- 3.1.3 Developing and implementing the means, procedures, and practices necessary for safe permit space entry operations, including:
 - 3.1.3.1 Specifying acceptable entry conditions;
 - 3.1.3.2 Isolating the permit space;
 - 3.1.3.3 Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards;
 - 3.1.3.4 Providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards; and
 - 3.1.3.5 Verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
- 3.1.4 Developing and implementing a system for the preparation, issuance, use, and cancellation of entry permits.
- 3.1.5 Ensuring this policy is in effect and periodically reviewed with each employee and that all employees acquire the knowledge and skills necessary for the safe performance of confined space entry. Training shall establish employee proficiency in the duties associated with permit space entry and allow for the introduction of new or revised permit space procedures. Specific training is required for Entry Supervisors so that



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they may provide training to employees involved in a confined space entry. This training must include:

- 3.1.5.1 The mode, signs or symptoms, and consequences of exposure to specific hazardous gases found in permit spaces;
 - 3.1.5.2 The proper use of applicable personal protective equipment;
 - 3.1.5.3 The proper use of equipment for work; and,
 - 3.1.5.4 The proper use of communications equipment when used during an entry in permit spaces.
- 3.1.6 Developing and implementing procedures for summoning the Confined Space Rescue Team, for providing necessary emergency services, and for preventing unauthorized personnel from attempting a rescue.
- 3.1.7 Establishing a program to audit/update the General Confined Space Entry Policy and specific Confined Space Entry Procedures in conjunction with the General Hazardous Energy Lockout Policy (H.E.L.P.).
- 3.1.8 Reviewing the permit-required confined space program, using the canceled permits and revising the program as necessary. This will ensure that employees participating in entry operations are protected from permit space hazards.
- 3.1.9 Providing the following equipment at no cost to employees, maintaining the equipment properly, and ensuring employees use the equipment properly:
- 3.1.9.1 Ventilating equipment to maintain a non-hazardous atmosphere;
 - 3.1.9.2 Communications equipment necessary to maintain communication between Security and Attendant, when necessary, between Entrant(s) and Attendant, and in case of an emergency, between Security and Rescue Services.
 - 3.1.9.3 Personal protective equipment as needed where engineering and work practice controls do not adequately protect employees;
 - 3.1.9.4 Lighting equipment needed to enable employees to see well enough to work safely and to exit the space quickly in an emergency;



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- 3.1.9.5 Barriers and shields as required by 3.1.3.4 above; and,
- 3.1.9.6 Equipment such as ladders, needed for safe entrance and exit by authorized entrants.

- 3.1.10 Developing and implementing procedures necessary for concluding the entry after entry operations have been completed.
- 3.1.11 Developing and implementing procedures to coordinate entry operations when employees of more than one employer are working simultaneously as authorized entrants in a permit space. This will ensure that employees of one employer do not endanger the employees of any other employer.
- 3.1.12 Establishing a procedure for reclassifying a permit space as a non-permit space.
- 3.1.13 Establishing a procedure for entry into a Permit Required Confined Space that contains or has the potential to contain an Immediately Dangerous to Life or Health (IDLH) atmosphere.
- 3.1.14 Establishing an enforcement guideline for this procedure.

3.2 Continuance

It is the responsibility of the respective Department Managers to perform the following 3 steps to ensure continuance of the General Confined Space Entry Policy, as required by OSHA 29 CFR Parts 1910.146, Permit-Required Confined Spaces for General Industry:

3.2.1 Periodic Inspections:

A periodic inspection of a number of selected specific Confined Space Entry Procedures will be conducted at least annually to ensure the procedures are being followed. The inspections will conform to the following guidelines:

- 3.2.1.1 The inspection will consist of an Inspector observing an employee or employees engaged in a permit space entry using a specific Confined Space Entry Procedure, the General Confined Space Entry Policy, and any applicable H.E.L.P. Procedures;



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- 3.2.1.2 The Inspector will be a qualified Entry Supervisor who is not involved in performing the entry;
- 3.2.1.3 The inspection will be designed to correct any deviations or inadequacies observed;
- 3.2.1.4 The inspection will include a review of the employee's responsibilities regarding the specific Confined Space Procedure being inspected; and,
- 3.2.1.5 The department managers will certify that the periodic inspections have been performed. The Confined Space Entry Inspection form, Exhibit C; completed during the certification will identify the permit space which was being entered, the date of the inspection, the employees performing the entry, and the employee performing the inspection.

3.2.2 Procedures Audit/Update:

Retained canceled permits must be reviewed after each entry. The General Confined Space Entry Policy and specific Confined Space Entry Procedures will be updated as required when an inspection, audit of canceled permits, or permit space modification reveals a discrepancy in the specific or general hazard control methods being used.

3.2.3 Training:

Training will be provided for continuance of employee proficiency and to introduce new or revised hazard control methods using the following guidelines:

- 3.2.3.1 Before the employee is first assigned to a confined space entry;
- 3.2.3.2 Before there is a change in assigned duties;
- 3.2.3.3 Whenever there is a change in permit space operations that presents a hazard about which an employee has not previously been trained; and,
- 3.2.3.4 Whenever the Department Manager has knowledge from a periodic inspection that there are deviations from the permit space entry procedures or that there are inadequacies in the employee's knowledge or use of these procedures.



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Each Department Manager will ensure that the General Confined Space Entry Policy is reviewed with each employee at least once each year.

The Confined Space Rescue Team will be trained on a yearly basis.

4. OVERVIEW

The use of this confined space entry policy will ensure safety of each employee entering a confined space.

Any deviation from this policy must be reported in writing to the department manager of the confined space being entered. A copy of the report will be sent to the Safety Coordinator.

5. REFERENCES

Department of Labor, Occupational Safety and Health Administration, 29 CFR Part 1910.146 Permit-Required Confined Spaces, effective February 1, 1999.

Coosa Pines Operations Procedure, General Hazardous Energy Lockout Policy - H.E.L.P.

Department of Labor, Occupational Safety and Health Administration, 29 CFR Part 1910.134 Respiratory Protection, effective April 8, 1998.

6. GENERAL ENTRY PROCEDURES

Entry Permit Procedure : The Entry Permit documents compliance with this procedure and authorizes entry to a permit space. This procedure is written in chronological order with the person responsible specified for each section.

6.1 Entry Supervisor

The Entry Supervisor is the person who has been trained and is responsible for determining if acceptable entry conditions are present at a permit space where



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entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry. The Entry Supervisor:

- 6.1.1 Coordinates completion of the Confined Space Entry Permit (Exhibit A.).
- 6.1.2 Ensures that a specific Confined Space Entry Procedure and/or H.E.L.P. procedure showing lockout points, confined space openings, connected equipment, usual contents, and gases to be tested is followed for lockout and confined space entry. These documents must be available for employee's reference at the entry site.
- 6.1.3 Ensures that a qualified person eliminates any conditions making it unsafe to remove an entrance cover before the cover is removed, and removes all hazards; (i.e., valve off pipelines, lock electrical hazards out, etc.), from the confined space according to the specific H.E.L.P. procedure for that confined space (see General H.E.L.P.).
- 6.1.4 Ensures that the Rescue Team has been given reasonable advance notice of the Entry so any required pre-entry preparations can be made.
- 6.1.5 Ensures that the confined space is adequately ventilated; i.e., by natural ventilation, fans, blowers, air movers, etc. Vapors generally should be exhausted through roof manholes to disperse the atmosphere of the confined space into the surrounding atmosphere, reducing the possibility of gas pockets collecting in the bottom of the confined space. If a hazardous atmosphere is detected during entry, the space must be evaluated to determine how the hazardous atmosphere developed and measures must be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.
- 6.1.6 Verifies if special entry or exit requirements are in place for the specific confined space being entered (refer to page 4 of permit).
- 6.1.7 Ensures that when roof manhole covers are removed, the opening must be guarded by a railing, temporary cover, or other temporary barrier that will prevent an accidental fall through the opening and that will protect each employee working in the space from foreign objects entering the space.



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6.1.8 Designates the authorized Entrant(s) and Attendant(s), identifies the duties of each employee, and provides Attendant with the training (via page 2 of the CSE Permit – Attendant Duties) required to safely make the specific confined space entry operation.

6.1.9 Verifies that the means for summoning the Rescue Team are operable.

6.1.10 Completes a new Confined Space Entry Permit if a new Entry Supervisor is designated for any reason; (i.e., shift change, illness, emergency, etc).

6.2 Atmospheric Tester

6.2.1 An Employee trained to perform atmospheric testing will test the atmosphere of a confined space for atmospheric hazards, including:

- Atmospheric oxygen concentration below 19.5% or above 23.5%; and,
- Flammable gas, vapor, or mist in excess of 10% of its lower flammable limit (LEL);
- Hydrogen Sulfide in concentrations greater than 10 ppm.
- Chlorine Dioxide in concentrations greater than 0.1 ppm when entry is within the PSM Area.
- Atmospheric concentration of any substance that could be present that could result in employee exposure in excess of its permissible exposure limit (PEL), or, in the case of a substance which has no PEL, an unsafe concentration.
- Airborne combustible dust at a concentration that meets or exceeds its LEL (this concentration may be approximated as a condition in which the dust obscures vision at a distance of 5 feet or less).

6.2.2 With the Entry Supervisor, and if requested by the Entrant, the Entrant or his designated representative present, test the confined space atmosphere for (in this order) oxygen content and the presence of explosive gases and vapors, (during the initial testing if mechanical ventilation of a space is occurring, it must be shut down while the atmospheric testing is being performed. If a consecutive Permit is being



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put into effect and mechanical ventilation is occurring, the ventilation may continue during the re-test) and,

- 6.2.3 If the Atmospheric Tester or the Entry Supervisor determines that there is a probability of a gas pocket that cannot be tested from the confined space opening, an entry is required for further testing. If further testing is desired but there is no definitive reason to believe there is a gas pocket, then the Tester may enter the space, after fulfilling the requirements for an Entrant, (this includes the requirement to wear a harness and lifeline, no exemptions), and test the atmosphere by use of the extension wand. In cases where additional Atmospheric Testing is required that is beyond the scope of the training received by the Atmospheric Tester, contact Safety.
- 6.2.4 If an entry is necessary to test the atmosphere in a space where knowledge of the space indicates the possibility of a gas pocket all requirements for a Confined Space Entry into an Immediately Dangerous to Life or Health (IDLH) atmosphere must be followed. These include:
 - 6.2.4.1 Check to be sure H.E.L.P. Procedure was adequately followed, and then place a lock on lock box.
 - 6.2.4.2 Entrant must use air supply respirator, full body harness, safety retrieval line, and any other P.P.E. required.
 - 6.2.4.3 An Attendant must be present at the entry point.
 - 6.2.4.4 An employee who is trained and equipped to provide emergency rescue must be located outside the entry point as required by CFR 1910.134 Respiratory Protection, Section G (3), Procedures for IDLH atmosphere.
- 6.2.5 Perform other atmospheric tests as requested on the Confined Space Entry Permit (completed by the Entry Supervisor using the specific Confined Space Entry Procedure) before entry is permitted.
- 6.2.6 Record the test results on the Confined Space Entry Permit.
- 6.2.7 Inform the Entry Supervisor, Attendant(s) and Entrant(s) if present, of any hazards indicated by the test.



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6.3 Entry Supervisor

6.3.1 If hazardous gases are found.

6.3.1.1 Block the entry points to the confined spaces; and,

6.3.1.2 Clear the atmosphere in the confined space before asking for a Retest

6.3.2 When safe entry is verified, the Confined Space Entry Permit along with the Pre-Entry Inspection Form and any associated exemption forms will be posted at the entry point. Inform Entrants of the type material normally contained in the confined space and hazards to be encountered in and around the confined space.

6.3.3 Will request that a retest of atmosphere be made by the Atmospheric Tester if entry into a confined space is not made within 1 hour of the initial test, or if work in a confined space is interrupted for more than 1 hour. This requirement must be shared with the Attendant so that he will be aware of the need to call the Entry Supervisor to have the re-test performed.

6.3.4 Will ensure that the Confined Space is monitored continually.

6.3.5 The Entry Supervisor, as well as the Attendant and the Entrant are responsible for the safety of the Entrant. The Entry Supervisor will approve Entry in writing at the bottom of the Confined Space Entry Permit after all preparations and precautions are complete and documented.

6.3.6 If a new Entry Supervisor is designated for any reason; (i. e., shift change, illness, emergency, etc.), a new Confined Space Entry Permit must be completed.

6.3.7 The Entry Supervisor will remove all unauthorized individuals who enter or who attempt to enter the permit space during entry operations.



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6.4 Authorized Entrant

An Authorized Entrant is a trained individual who is authorized by the Entry Supervisor to enter a permit space.

- 6.4.1 Atmospheric testing of the confined space must be done in the presence of the Entrant or his/her designated representative, if requested by the Entrant. The Entrant must understand the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure to hazardous substances that may be present. The Entrant(s) must alert the Attendant if any warning sign or symptom from these hazards becomes evident.
- 6.4.2 When working in a confined space the Entrant must wear a safety harness and lifeline, unless it would increase the overall risk of entry or would not contribute to the rescue of the Entrant. A procedure to establish an exemption to this rule is located in Exhibit E. If an Exemption is given to a Space the signed exemption form must be posted with the Permit. Retrieval systems shall meet the following requirements:
 - 6.4.2.1 Each Authorized Entrant must use a full body harness, with a retrieval line attached at the center of the Entrant's back near shoulder level, or above the Entrant's head. If a full body harness and lifeline cannot be used due to the configuration of the space, wristlets and lifelines are acceptable.
 - 6.4.2.2 The other end of the retrieval line must be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary. A mechanical device must be available to retrieve personnel from vertical type permit spaces more than 5 feet deep.
- 6.4.3 Equipment required to perform work in a permit space will be of the following kind:
 - 6.4.3.1 Portable electric tools and lights used in the confined space must have a ground fault interrupter (GFI).



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- 6.4.3.2 Lights must have protective cages or guards attached, and be adequate to see well enough to work safely and to exit the space quickly in an emergency;
 - 6.4.3.3 Ladders must be of the proper length and lashed into place. Ladders are not to be removed while employees are inside a confined space, unless they interfere with the task;
 - 6.4.3.4 Communications equipment necessary to communicate with the Attendant, to enable the Attendant to monitor Entrant status, and to enable the Attendant to alert Entrants of the need to evacuate the space as required; and,
 - 6.4.3.5 Personal protective equipment as specified by the applicable C.S.E.P. / H.E.L.P. procedure.
- 6.4.4 The Entrant must exit from the permit space as quickly as possible whenever:
- 6.4.4.1 A hazardous atmosphere is detected by atmospheric testing during entry;
 - 6.4.4.2 An order to evacuate is given by the Attendant or the Entry Supervisor;
 - 6.4.4.3 The Entrant recognizes any warning sign or symptom of exposure to a dangerous situation; or,
 - 6.4.4.4 An evacuation alarm is activated.

6.5 Attendant

The Attendant is the individual stationed outside the permit space who monitors the authorized entrants presence and condition. The Attendant acknowledges understanding of the Attendant's Duties (page 2 of CSE Permit). The Attendant shall understand and speak English to effectively communicate with site personnel (Entry Supervisor, Security Officer, etc.).

- 6.5.1 The Attendant must be stationed outside the confined space to observe the employee(s) inside. The Attendant will perform no duties that might interfere with the primary duty to monitor and protect Authorized Entrants(s). There must be at least one Attendant per confined space for the duration of the entry.



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- 6.5.2 The Attendant will maintain a roster of the Entrants and their entry and exit times. This can be accomplished by using the Confined Space Entry Permit Roster of Entrants Exhibit A page 3.
- 6.5.3 The Attendant will maintain a record of the monitor readings at two hour intervals in the appropriate blanks on the permit.
- 6.5.4 The Attendant will notify the Entry Supervisor to request a retest of the Confined Space atmosphere if the Entry is not made within one hour of the initial test, or if the Space is empty for more than one hour.
- 6.5.5 If the Attendant must leave the entrance temporarily, all Entrants must exit the Confined Space.
- 6.5.6 If an emergency arises at his/her confined space the Attendant will:
- Inform the Entrants to exit, (if feasible);
 - Notify Security to summon the Rescue Service by use of the 2-way mill radio on the Confined Space channel or as a back up dial the Security Emergency number, Ext. 2222, (256-378-2222).
 - Never attempt to enter the permit space to rescue the Entrant(s); Non-entry rescues may be attempted.
- 6.5.7 If an emergency arises at another entry location, all Confined Space Attendants will be notified by Security over the mill radio Confined Space channel that he/she must inform the Entrants at his / her confined space to exit. For this reason it is required that the Attendants monitor the mill radio Confined Space channel continually. Re-Entry may begin only when the emergency has been resolved and the Rescue Team is once more available.
- 6.5.8 The Attendant must understand the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure to hazardous substances that may be present, and any possible behavioral effects of hazard exposure. He / She will alert the Entrant if any warning sign or symptom from these hazards becomes evident.



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6.5.9 If the Attendant changes during a permit space entry, the new Attendant must verify the whereabouts of all authorized Entrants before the previous Attendant may leave.

6.5.10 The Attendant will take the following actions when unauthorized persons approach or enter a permit space while entry is underway:

6.5.10.1 Warn unauthorized persons they must stay away from the permit space.

6.5.10.2 Advise unauthorized persons they must exit immediately if they have entered the permit space; and,

6.5.10.3 Inform Authorized Entrants and the Entry Supervisor if unauthorized persons have entered the permit space.

6.6 Rescue Service

The Confined Space Rescue Team members are the authorized personnel designated and trained to rescue employees from permit spaces. Rescue Team members will be prepared at all times to respond to any confined space emergency. For an emergency, they may be reached by contacting Security using the 2-way mill radio on the Confined Space channel, or as a back up dial the Security Emergency Number – Ext. 2222, (256-378-2222).

6.6.1 A qualified rescue team member will perform a pre-entry inspection prior to the beginning of any Entry.

6.6.2 Rescue and emergency equipment will be supplied by the Rescue Service.

6.7 Entry Supervisor

6.7.1 When work in the confined space is complete:

6.7.1.1 A debriefing to review the confined space entry with all individuals involved (including contractors) will be conducted at the conclusion of the entry, regarding the permitted space program, along with any hazards confronted or created in



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permitted space during entry operations. This shall be documented on the permit in the space provided.

- 6.7.1.2 Close off the permit space per the specific Confined Space Entry Procedure; notify Security (using the Confined Space channel) that the entry has been terminated.
- 6.7.1.3 Void the Permit by recording the time you report to Security as the termination time for the Entry in the appropriate blank on the Permit.
- 6.7.1.4 Remove the Permit, Pre-Entry Inspection Form, and any associated exemption forms and place them in interoffice mail to Safety.

6.7.2 If the Entry Supervisor changes:

- 6.7.2.1 A debriefing to review the confined space entry with all individuals involved (including contractors) will be conducted at the conclusion of the entry, regarding the permitted space program, along with any hazards confronted or created in permitted space during entry operations. This shall be documented on the permit in the space provided.
- 6.7.2.2 Close off the permit space per the specific Confined Space Entry Procedure; notify Security (using the Confined Space channel) that the entry has been terminated.
- 6.7.2.3 Void the Permit by recording the time you report to Security as the termination time for the Entry in the appropriate blank on the Permit.
- 6.7.2.4 Remove permit and place in inter-office mail to Safety.

6.8 Security

- 6.8.1 When security personnel receive notification from the Entry Supervisor that a confined space entry operation is underway, it is logged on the Confined Space Entry Operation Notification Log (Exhibit D).
- 6.8.2 Security and the Entry Supervisor verify and record:
 - 6.8.2.1 The assigned Permit number.



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- 6.8.2.2 Who performs the Entry, will be Coosa employees, or if it is a contractor entry, the contractor groups name.
- 6.8.2.3 The time.
- 6.8.2.4 The Entry Supervisor.
- 6.8.2.5 The Attendant.
- 6.8.2.6 The location of the Entry, specific enough that the Rescue Team could be dispatched to the area.
- 6.8.2.7 That the Confined Space channel on the Attendant's 2-way mill radio is operable.

6.8.3 In case of an emergency, Security notifies the Rescue Team of a Confined Space Emergency and gives the all-clear when it is safe to re-enter the confined space.

6.8.4 When security personnel receive notification from the Entry Supervisor that a confined space entry operation is complete, the time is logged on the Confined Space Entry Operation Notification Log (Exhibit D).

7. ENTRY PROCEDURES FOR IDLH ATMOSPHERES

Definition: Immediately Dangerous to Life or Health, (IDLH); “an atmosphere that poses an immediate threat to life, would cause irreversible adverse health effects, or would impair an individual’s ability to escape from a dangerous atmosphere”. In addition to all procedures that are required to make a routine entry into a permit required confined space:

- 7.1 Employees required to enter a permit required confined space that has (or may have)* an IDLH atmosphere, will wear a positive pressure SCBA, or other positive pressure supplied-air respirator with an auxiliary SCBA, in addition to all other PPE and retrieval equipment required for routine entries.
- 7.2 When employees are required to enter a permit required confined space that has or may have an IDLH atmosphere, properly trained and equipped Rescue Team personnel will be located immediately outside the entry point to provide an emergency rescue should one become necessary.

*Any unknown atmosphere must be treated as an IDLH atmosphere.



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8. NON-PERMIT CONFINED SPACES

All confined spaces are initially considered permit required.

9. SEWER WORK PROCEDURE

Sewer entry differs in two vital respects from other permit entries:

- There rarely exists any way to completely isolate the space (a section of a continuous system) to be entered;
- Because isolation is not complete, the atmosphere may suddenly and unpredictably become lethally hazardous (toxic, flammable or explosive) from causes beyond the control of the Entrant or the Coosa Pines Mill Operations.

9.1 Adherence to Procedure

Employees designated as Entrants must be thoroughly trained in the specific Sewer Entry Procedure and demonstrate that they follow the procedure exactly as prescribed when performing the entry.

9.2 Atmospheric Monitoring

Entrants must be trained in the use of, and be equipped with, atmospheric monitoring equipment which sounds an audible alarm, in addition to its visual readout, whenever one of the following conditions is encountered:

- Oxygen concentration less than 19.5%;
- Flammable gas or vapor at 10% or more of the lower flammable limit (LFL);
- Hydrogen Sulfide or Carbon Monoxide at or above their NIOSH Airborne Exposure Limit of 10 ppm or 35 ppm, respectively; or,
- If a broad range sensor device is used, at 100 ppm as characterized by its response to toluene. Coosa employees will not be using a broad range sensor device, but contractor employees may.

The instrument should be carried and used by the Entrant to monitor the atmosphere in the Entrant's environment, and in advance of the Entrant's



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movement, to warn the Entrant of any deterioration in atmospheric conditions. Where several Entrants are working together in the same immediate location, one instrument, used by the lead Entrant, is acceptable.

9.3 Surge Flow and Flooding

Sewer crews should listen to the local weather bureau and contact the mill fire and emergency services so that sewer work may be delayed or interrupted and Entrants withdrawn whenever sewers might be suddenly flooded by rain or fire suppression activities, or whenever flammable or other hazardous materials are released into sewers.

9.4 Special Equipment

Entry into large bore sewers may require the use of special equipment, such equipment might include such items as atmospheric monitoring devices with automatic audible alarms, escape self-contained breathing apparatus (ESCBA) with at least 10 minute air supply (or other NIOSH approved self-rescuer), and waterproof flashlights, and may also include boats and rafts, radios and rope stand-offs for pulling around bends and corners as needed.

10. CONTRACTOR PROCEDURE

- 10.1 When Coosa Pines Mill Operations (host employer) arranges to have employees of another employer (contractor) perform work that involves permit space entry, the Coosa Pines Contact Person will:
 - 10.1.1 Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program that at a minimum meets the host employers permit space program requirements;
 - 10.1.2 Apprise the contractor of the elements, including the hazards identified and the host employer's experience with the space, that makes the space in question a permit space;



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- 10.1.3 Apprise the contractor of any precautions or procedures that the host employer has implemented for the protection of employees in or near permit spaces where contractor personnel will be working;
- 10.1.4 Coordinate entry operations with the contractor, when both host employer personnel and contractor personnel will be working in or near permit spaces;
- 10.1.5 Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in permit spaces during entry operations and indicate on permit.
- 10.2 In addition to complying with these permit space requirements, each contractor who is retained to perform permit space entry operations shall:
 - 10.2.1 Obtain any available information regarding permit space hazards and entry operations from the host employer;
 - 10.2.2 Coordinate entry operations with the host employer, when both host employer personnel and contractor personnel will be working in or near permit spaces; and
 - 10.2.3 Inform the host employer of any additional requirements of the permit space program that the contractor will follow and of any hazards confronted or created in permit spaces, either through a debriefing or during the entry operation.

11. RESCUE SERVICE PROCEDURE

- 11.1 The Confined Space Rescue Team is made up of personnel designated and trained to rescue employees from permit spaces. For emergencies they may be reached by contacting Security using the 2-way mill radio on the Confined Space channel, or as a backup dial the Security Emergency Number Ext. 2222, (256-378-2222).



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- 11.2 Members of the Rescue Team will be trained in basic first-aid and cardiopulmonary resuscitation.
- 11.3 Members of the Rescue Team will be provided with, and trained to use properly, the personal protective equipment and rescue equipment necessary for making rescues from permit spaces.
- 11.4 Members of the Rescue Team will practice making permit space rescues at least once every 12 months.
- 11.5 If an injured Entrant is exposed to a substance, that SDS must be made available to the medical facility treating the exposed Entrant.

12. RECLASSIFICATION PROCEDURE

A permit space may be reclassified as a non-permit space if the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated prior to entry or after a permitted entry has removed or verified the elimination of hazards. This reclassification can remain in effect as long as the hazards remain eliminated. Control of atmospheric hazards through forced air ventilation does not constitute elimination of the hazards. Examples of potential hazards include hazards such as those generated by welding, cutting, use of adhesives and paints, or the introduction of any other recognizable safety or health hazard.

- 12.1 In order to reclassify a permit space as a non-permit space,
 - 12.1.1 A Reclassification Procedure must be written for the specific confined space. The Reclassification Procedure must be endorsed and approved by the Operations Manager or designee.
 - 12.1.2 A Confined Space Reclassification certification form (Exhibit B) must be completed for documentation, which must include:
 - 12.1.2.1 The basis for determining that all hazards in a permit space have been eliminated;
 - 12.1.2.2 A H.E.L.P. procedure inspection must be included as part of the procedure;



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- 12.1.2.3 The date;
- 12.1.2.4 The location of the space; and
- 12.1.2.5 The signature of the person making the determination.

12.1.3 A complete Confined Space Entry Permit must be performed to validate the Space conditions.

12.1.4 The reclassification certification form, along with the Confined Space Permit Entry Permit must be available for viewing by each employee entering the reclassified space.

13. ENFORCEMENT

13.1 The responsibility for enforcement of this policy is vested in the respective Department Managers.

13.2 Department Managers will lead a near-miss accident investigation following any procedure violation. This near-miss accident investigation must establish an action plan to prevent any recurrence of the violation. The action plan may include disciplinary action of any employee violating these procedures. Strict enforcement of this policy is necessary for the protection of life and limb of Coosa mill employees and contractors.

14. EXHIBITS

- Exhibit A - Confined Space Entry Permit includes Attendant's Duties and Roster of Entrants
- Exhibit B - Confined Space Reclassification
- Exhibit C - Confined Space Entry Inspection
- Exhibit D - Confined Space Entry Operation Notification
- Exhibit E – Procedure For Establishing Exceptions From Retrieval Equipment Requirements
- Exhibit E 1 – Documentation Form for Temporary Exemption To Requirement To Wear Lifelines And / Or Harnesses
- Exhibit E 2 – Documentation Form for Permanent Exemption To Requirement To Wear Lifelines And / Or Harnesses.



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Exhibit A (Page 1)

CONFINED SPACE ENTRY PERMIT (CSEP)

PERMIT # _____ (Note: Obtain Permit # from Security using the Confined Space Channel on the Mill Radio)

1. General Information

Permit space location & equipment description: _____
Purpose of Entry: _____

2. Pre-Entry & Entry Equipment (check all that apply)

| | |
|---|--|
| Lockout for space meets CSEP requirements (isolation using dbl blk & blds, blanks, spools, etc.) <input type="checkbox"/> Yes | Ventilation equipment used? <input type="checkbox"/> Yes |
| Space requires cleaning, draining, purging, etc. <input type="checkbox"/> Yes | Harness? <input type="checkbox"/> Used or <input type="checkbox"/> Exemption in effect & posted |
| Communication Method | Lifeline? <input type="checkbox"/> Used or <input type="checkbox"/> Exemption in effect & posted |
| 1 Radio (for Attendant) or <input type="checkbox"/> Yes | Entry Point? <input type="checkbox"/> Vertical <input type="checkbox"/> Horizontal |
| 3 Radios (2 for Attendant plus 1 for Entrant) <input type="checkbox"/> Yes | Special Entry/Exit? <input type="checkbox"/> Yes <input type="checkbox"/> No (Refer to Page 4) |
| Tools/equip /PPE approved for hazards? <input type="checkbox"/> Yes | Rescue system at? <input type="checkbox"/> Entry <input type="checkbox"/> Rescue Truck |
| | Respirator (if used)? <input type="checkbox"/> Filtered <input type="checkbox"/> Air-Supplied <input type="checkbox"/> n/a |
| | Pre-entry inspection by qualified ERT? <input type="checkbox"/> Yes |

3. Continuous Monitoring

Trained Atmospheric Tester performs Starting Test & records results

Attendant records all monitor results after Starting Test

Atmospheric Tester _____ AM / PM
(Print Name Legibly) (Date / Time of Starting Test)

Monitor # _____

Attendant Initials: _____

| Condition | Acceptable Level | Starting Test | Time: | | | | | | | | |
|-------------------------|------------------|---------------|---------|---------|---------|---------|---------|---------|---------|---------|--|
| | | | AM / PM | AM / PM | AM / PM | AM / PM | AM / PM | AM / PM | AM / PM | AM / PM | |
| Chlorine Dioxide (ClO2) | < 0.1 ppm | | | | | | | | | | |
| Carbon Monoxide (CO) | < 35 ppm | | | | | | | | | | |
| Combustible (LEL) | < 10% | | | | | | | | | | |
| Hydrogen Sulfide (H2S) | < 10 ppm | | | | | | | | | | |
| Oxygen (O2) | 19.5-23.5% | | | | | | | | | | |
| Other | | | | | | | | | | | |

4. Permit Space Hazards (check all that apply at time of entry)

| | | |
|--|---|--|
| Carbon Monoxide (CO) <input type="checkbox"/> Yes | Hydrogen Sulfide (H2S) <input type="checkbox"/> Yes | Electrical <input type="checkbox"/> Yes |
| Explosive (gas/vapor/dust) <input type="checkbox"/> Yes | Oxygen (O2) Deficiency <input type="checkbox"/> Yes | Engulfment/Drowning <input type="checkbox"/> Yes |
| Gases or vapors - flammable <input type="checkbox"/> Yes | Oxygen (O2) Enrichment <input type="checkbox"/> Yes | Heat Stress <input type="checkbox"/> Yes |
| Gases or vapors - toxic <input type="checkbox"/> Yes | Configuration/Entrapment <input type="checkbox"/> Yes | Material Harmful to Eyes/Skin <input type="checkbox"/> Yes |
| Other (explain) <input type="checkbox"/> Yes | | |

5. Entry Authorization

- Note 1: The Entry Supervisor shall not authorize entry until AFTER the Starting Atmospheric Test has been completed & record
- Note 2: Permit valid as long as Entry Supervisor is on site.
- Note 3: Reviewed for specific entry/exit requirements (Refer to Page 4).

I certify that all required precautions have been taken, hazards have been reviewed with employees and contractors, and necessary equipment is being provided for safe entry and work in this confined space.

Entry Supervisor _____ AM / PM
(Print Name Legibly) (Date / Time Authorized by Entry Supervisor)

6. Entry Voided (i.e., cancelled due to job completion or end of Entry Supervisor shift) & Security Notified

(Date / Time Permit Voided) AM/PM



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EXHIBIT A (Page 2)

CONFINED SPACE ENTRY PERMIT (CSEP)

ATTENDANT DUTIES

Definition: A CSEP Attendant is "the individual stationed outside the permit space who continuously monitors the authorized Entrants and the conditions within the permit space while the confined space entry is active." Note: There must be at least one Attendant per Confined Space.

1) General

The attendant shall

- a) Speak and understand English to effectively communicate with site personnel (Entry Supervisor, Security Officer, etc.).
- b) Know the hazards, symptoms (including potential behavioral effects), and consequences of exposure to the materials that may be present during entry.
- c) Wear PPE to protect from all hazards, including those inside the space.
- d) Remain outside the entry point.
- e) Maintain observation of, or communication with, Entrant(s).
- f) Perform no duties that might interfere with your duty to monitor the Entrant(s).
- g) Maintain the Entry Log, record each Entry/Exit.
- h) Control entry point by ensuring that unauthorized personnel do not enter the permit space.
- i) Record Atmospheric Test readings on the CSEP form in 2-hour intervals.
- j) Summon rescuers, if required.
- k) Notify Entry Supervisor and Security when Confined Space Entry has been completed.

2) Repeat Atmospheric Testing

The Attendant shall notify the Entry Supervisor and request a repeat Atmospheric Test before entry or re-entry in the following situations:

- a) The Entrants fail to enter the Confined Space within one hour of the initial test.
- b) The Confined Space has been vacated for one hour or more at any time during the entry period.

3) Vacating the Confined Space Entry or Changing Attendants

- a) If the confined space is vacated and the Attendant leaves the entrance, the space must be barricaded (using red barricade tape or some other approved type of barricade) to prevent unauthorized entry.
- b) If a replacement Attendant takes over duties, the Entrants may remain in the Confined Space if:
 - i) The new Attendant verifies the whereabouts of all authorized Entrants before the original Attendant leaves the CSEP site,
 - ii) The new Attendant notifies all Entrants of the change in Attendants.

4) Emergency

- a) Exit
 - i) If an emergency arises at the confined space, the Attendant:
 - (1) Shall inform the Entrants to exit (if feasible).
 - (2) Shall use the Confined Space Channel on the Mill Radio to contact Security and request that Rescue Service be summoned.
 - (3) May attempt non-entry rescue only (i.e., pull on life-line) after notifying Security of the emergency.
 - ii) If an emergency arises at another Confined Space that requires the Rescue Team, the Attendant shall inform the Entrants to exit after being notified to exit by Security. Re-Entry may begin only when the emergency has been resolved and Security has issued an "all-clear" millwide notification signifying that the Rescue Team is once more available.

Attendant(s) understand CSEP duties as described above:

(Print Name Legibly)



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Exhibit A (Page 3)

CONFINED SPACE ENTRY PERMIT (CSEP) - ENTRY LOG

CONTRACTOR: YES NO COMPANY NAME: _____

MONITOR S/N: _____

| IN CASE OF EMERGENCY | ATTENDANT(S) (print name legibly) |
|--|---|
| <p>1) Contact Security using Confined Space Channel on Mill Radio</p> <p>2) Back-up only - Use a telephone to call Security at 256.378.2222 or Mill telephone Ext. 2222</p> | <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> |

| ENTRANT(S) (print name legibly) | TIME (circle AM or PM) | | | | | | | | | | | |
|------------------------------------|------------------------|-----|----|-----|----|-----|----|-----|----|-----|----|----|
| | In | Out | In | Out | In | Out | In | Out | In | Out | | |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
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| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |
| | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM | AM |
| | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM | PM |

POST ENTRY DEBRIEFING (discrepancies or unexpected issues with entry): _____

No Issues



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Exhibit A (Page 4)

| CONFINED SPACE ENTRY PERMIT (CSEP) | | | |
|--|---|--|-----------------------------------|
| CONFINED SPACES WITH SPECIAL ENTRY / EXIT REQUIREMENTS | | | |
| If applicable, check confined space being entered. | | | |
| CONFINED SPACE | Special Entry / Exit Requirements | CONFINED SPACE | Special Entry / Exit Requirements |
| Woodyard: | | Utilities: | |
| <input type="checkbox"/> M-11237, North Reclaim conveyor | Clean out around reclaim before entry. | <input type="checkbox"/> Settle Water Basin, Nos. 1 thru 7 | Ladder inside |
| <input type="checkbox"/> M-14156, South Reclaim conveyor | Clean out around reclaim before entry. | <input type="checkbox"/> Filter Bed, Nos. 1 thru 7 | Ladder inside |
| <input type="checkbox"/> M-13123, No. 3 Truck Dump Hopper | Horizontal entry or permanent ladder/non-slip mats | <input type="checkbox"/> Clearwell #1 Filter Plant | Ladder inside |
| <input type="checkbox"/> M-11244, OCS Screen Cyclone | Vertical entry / ladder or scaffold | <input type="checkbox"/> Reservoir Basin, Nos. 1 | Ladder inside |
| <input type="checkbox"/> M-14165, OCS Screen Cyclone | Vertical entry / ladder or scaffold | <input type="checkbox"/> Reservoir Basin, Nos. 2 | Ladder inside |
| <input type="checkbox"/> M-11316, OCS No. 2 Dump Cyclone | Vertical entry / ladder or scaffold | <input type="checkbox"/> Reservoir Basin, Nos. 3 | Ladder inside |
| <input type="checkbox"/> M-14199, North Pine Bin Cyclone | Vertical entry / ladder or scaffold | <input type="checkbox"/> Reservoir Basin, Nos. 4 | Ladder inside |
| <input type="checkbox"/> M-1188, North Pine Bin Cyclone | Vertical entry / ladder or scaffold | <input type="checkbox"/> Condenser Basin at Reservoir | Ladder inside |
| <input type="checkbox"/> M-1457, North Pine Bin | Clean bin and build scaffold | <input type="checkbox"/> North River Line | Ladder or cable hoist inside |
| Pulp Mill: | | <input type="checkbox"/> South River Line | Ladder or cable hoist inside |
| <input type="checkbox"/> M34215, B Clo2 Generator | Vertical entry / scaffold | <input type="checkbox"/> M9715, No. 1 Water Softener | Ladder inside |
| <input type="checkbox"/> M34217, B Clo2 Absorber | Horizontal entry / scaffold | <input type="checkbox"/> M9716, No. 2 Water Softener | Ladder inside |
| <input type="checkbox"/> M48002, E Bleachery D 100 tower | Horizontal and/or vertical, scaffold, lifeline exempt for diffuser work | <input type="checkbox"/> Eff. Clarifier, M80156, #2 WTP WW Clarifier | Scaffold / ladders inside and out |
| <input type="checkbox"/> M48003, E Bleachery EO Tower | Horizontal and/or vertical, scaffold, lifeline exempt for diffuser work | <input type="checkbox"/> Effluent, Aeration Basin, M6554, Defoamer Tanks | Ladder inside |
| <input type="checkbox"/> M48004, E Bleachery EO Retention Tube | Horizontal entry / scaffold | <input type="checkbox"/> Effluent Line to Splitter Box | Ladder or cable hoist inside |
| <input type="checkbox"/> M48005, E Bleachery D1 Tower | Horizontal and/or vertical / scaffold | Recovery: | |
| <input type="checkbox"/> M48006, E Bleachery D2 Tower | Horizontal and/or vertical, scaffold, lifeline exempt for diffuser work | <input type="checkbox"/> M6389, Rec Boiler, Fireside | Ladder or scaffold on inside |
| <input type="checkbox"/> M48045, E Bleachery Scrubber | Horizontal entry / scaffold | <input type="checkbox"/> M6389, Rec Boiler, Waterside (same dwg as fireside) | Ladder or scaffold on inside |
| <input type="checkbox"/> M1908, Tall Oil, Reactor Tank | Horizontal entry / scaffold | <input type="checkbox"/> M24147, Rec Evaporator, Product Liquor Flash Tank | Ladder on inside |
| <input type="checkbox"/> M21169, No. 5 Digester | Vertical entry / suspension entry | <input type="checkbox"/> M24191, Rec Evaporator, Steam Cond Flash Tank | Scaffold on outside |
| <input type="checkbox"/> M20185, No. 2 Digester | Vertical entry / suspension entry | <input type="checkbox"/> M27268, No.1 Causticizer, No. 3 system | Ladder or scaffold on outside |
| <input type="checkbox"/> M20186, No. 3 Digester | Vertical entry / suspension entry | <input type="checkbox"/> M27270, No.2 Causticizer, No. 3 system | Ladder or scaffold on outside |
| <input type="checkbox"/> M20187, No. 4 Digester | Vertical entry / suspension entry | <input type="checkbox"/> M29136, No. 3 Scrubber | Ladder or scaffold on outside |
| <input type="checkbox"/> M20188, No. 1 Digester | Vertical entry / suspension entry | <input type="checkbox"/> M29138, Lime Water Seal tank | Ladder or scaffold on outside |
| <input type="checkbox"/> Nos. 7-11 Digesters | Vertical entry / suspension entry | <input type="checkbox"/> M29143, Dust Collector, No. 3 Lime Kiln | Ladder or scaffold on outside |
| Pulp Dryer: | | <input type="checkbox"/> M29158, Reburned Lime Silo, No 3 Kiln | Ladder or scaffold on outside |
| <input type="checkbox"/> M3625, Wet End, Wire Pit | Harness (when working close to wire well) | <input type="checkbox"/> M29161, Fresh lime Silo, No. 3 Kiln | Ladder or scaffold on outside |
| <input type="checkbox"/> M33100, Wet End, No. 2 Hwd HD | Enter feet first | <input type="checkbox"/> M63206, De-min A anion | Ladder or scaffold on outside |
| <input type="checkbox"/> M33139, Wet End, No. 3 HD | Enter feet first | <input type="checkbox"/> M63207, De-min B anion | Ladder or scaffold on outside |
| <input type="checkbox"/> M33136, Wet End, Blichd HD Strg Tank | Enter feet first | <input type="checkbox"/> M63208, De-min A cation | Ladder or scaffold on outside |
| <input type="checkbox"/> M3384, Pulp Dryer Cull Storage Chest | Enter feet first | <input type="checkbox"/> M63209, De-min B cation | Ladder or scaffold on outside |
| <input type="checkbox"/> M3632, Seal Pit Box | Scaffold / ladder | <input type="checkbox"/> M63225, #1 Carbon Filter | Ladder or scaffold on outside |
| <input type="checkbox"/> M3636, Vacuum Pump Pit | Scaffold / ladder | <input type="checkbox"/> M63226, #2 Carbon Filter | Ladder or scaffold on outside |
| <input type="checkbox"/> M3665, Save- All Tank | Scaffold / ladder | <input type="checkbox"/> M63227, #3 Carbon Filter | Ladder or scaffold on outside |



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EXHIBIT C

CONFINED SPACE ENTRY INSPECTION FORM

Audit Team Must Include a Qualified Entry Supervisor not Involved in the Entry

| |
|---|
| Date: _____ Time: _____ Department: _____ Team Audited: _____ Name of Inspector/s _____ Confined Space Name & M#: _____ Was the proper Lockout Procedure used for the Entry?.....YES NO Are Lockout Lists signed?.....YES NO H.E.L.P. Name/Description: _____ |
|---|

| |
|--|
| Was a Pre-Entry Form completed?.....YES NO Is Confined Space Entry Permit properly completed and in place?.....YES NO Is a Permit # obtained from Security in place?.....YES NO Are all identified Hazards removed or addressed by proper Required Equipment?.....YES NO Was proper Preparation completed?.....YES NO Is there an Attendant present at the Entry Site?.....YES NO If no Attendant is present, is the space barricaded to prevent Entry?YES NO Are all Entrants listed on the Form?.....YES NO Was the Attendant provided with a list of Attendant Duties?.....YES NO Is the Attendant knowledgeable of the Attendant Duties?.....YES NO Was Atmospheric Test completed, Time entered and signed by Tester?.....YES NO Was Entry made within 1 hour of the initial Atmospheric Test?.....YES NO If space was empty for over 1 hour, was a retest performed by a trained Coosa Pines Atmospheric Tester?.....YES NO Is continuous monitoring occurring?.....YES NO Is the Attendant recording the monitor readings at 2 hour intervals?.....YES NO Was radio communication with Security verified, radio on and set to proper channel?.....YES NO Are Attendants & Entrants "Line of Sight", within voice range, or additional radios being used?.....YES NO Are Acceptable Atmospheric Levels met by the Initial Atmospheric Test and by the Attendants recorded monitor readings?.....YES NO Is all required PPE being used?.....YES NO Are Harnesses being used unless an exemption form is in place?.....YES NO Are Lifelines being used unless an exemption form is in place?.....YES NO |
|--|



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Are proper tools being used?

GFCI.....YES NO

Lights.....YES NO

Proper Ladders and Tied Off.....YES NO

Has the Entry Supervisor signed, dated and recorded the time in the

Authorization section?.....YES NO

Are Entrants listed on the Roster of Entrants with IN/OUT times?.....YES NO

List Entry Supervisor: _____

List Attendants: _____

List Entrants: _____

Note any Discrepancy discovered: _____

Note Corrective Actions taken: _____

Turn in an Incident Report for any Discrepancy.

Reviewed by Department Manager _____

Date _____

Distribution: Pulp Mill Admin. Assistant, Audit Log Book



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EXHIBIT D

| Permit Number | Date | Notification Times | | Name of Company requesting Confined Space Entry | Emergency Radio Verification | | Bowater's Supervisor requesting entry | Specific Entry Location (use as many lines as needed) |
|---------------|------|--------------------|--------|---|------------------------------|-----------|---------------------------------------|---|
| | | Start | Finish | | Officer | Attendant | | |
| 1 | | | | | | | | |
| 2 | | | | | | | | |
| 3 | | | | | | | | |
| 4 | | | | | | | | |
| 5 | | | | | | | | |
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This information is maintained by Security.



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EXHIBIT E

**PROCEDURE FOR ESTABLISHING EXEMPTIONS
FROM RETRIEVAL EQUIPMENT REQUIREMENTS**

A. Permanent Exemptions

Retrieval systems to facilitate non-entry rescue are an integral part of rescue equipment and shall be used unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the Entrant. Any space where a permanent exemption to this rule is required must be identified in advance by the department. An exemption request must then be approved by the Operations Manager or designee. Any space approved for exemption from this requirement must have the exemption included in writing in the Confined Space Entry Procedure for that space (see Permanent Exemption Form, Exhibit E1). If an exemption is made for a lifeline, this does not mean that the harness is also exempted. A harness is beneficial to rescue in almost all situations. In a case where the harness is exempted it must be specifically mentioned. When determining if a space should be exempted consideration must be given to various types of retrieval equipment. If a full body harness and lifeline cannot be used due to the configuration of the space, wristlets and lifelines can be used, if appropriate. In all cases where exemptions are granted consideration must also be given to the type of rescue that will be performed should an emergency occur.

B. Temporary Exemptions

A temporary exemption to the lifeline requirement can be obtained for entry into any Permit Required Confined Space, if:

- The internal configuration has been temporarily and substantially modified in preparation for work, or
- The nature of the work being performed causes the lifeline itself to increase the overall risk of the entry in such a way that the advantage of using the lifeline for rescue purposes is nullified, and
- An exemption request is approved by the Operations Manager or designee (see Temporary Exemption Form, Exhibit E2).



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EXHIBIT E 1

Permanent Exemption to Requirement to Wear Lifelines and/or Harnesses

Department: _____ Date: _____

Confined Space Name: _____ M-Number: _____

Exemption will be for: Lifeline Harness

Exemption applies to: All Entrants Designated Entrants

Entry Point will be: Horizontal Vertical

The following guidelines shall be used to determine whether or not a retrieval system should be used.

Check conditions below that apply to this confined space exemption:

- A permit space with obstructions or turns that prevent pull on the retrieval line from being transmitted to the entrant does not require the use of a retrieval system.
- A permit space from which an employee being rescued with the retrieval system would be injured because of forceful contact with projections in the space does not require the use of a retrieval system.
- A permit space that was entered by an entrant using an air-supplied respirator does not require the use of a retrieval system if the retrieval line could not be controlled so as to prevent entanglement hazards with the air line.

Comments: _____

Requested By: _____ Date: _____

Approved By: _____ Date: _____

Operations Manager

NOTE: Once authorized, CSEP Pre-Entry Inspection must be updated by an ERT Member.

Distribution: Department File
Copy attached to permit and sent to Safety Department

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EXHIBIT E 2

Temporary Exemption to Requirement to Wear Lifelines and/or Harnesses

Department: _____ Date: _____

Confined Space Name: _____ M-Number: _____

Exemption will be for: Lifeline Harness

Exemption applies to: All Entrants Designated Entrants

Entry Point will be: Horizontal Vertical

Check conditions below that apply to this confined space exemption:

Multiple entrants working in close proximity in such a way that the lifelines would create an unacceptable increased probability of tripping hazards or entanglement which would nullify the advantages of using the lifelines for rescue purposes.

Entrants working on scaffolding/ladder creating an unacceptable increased probability for falls.

Entrants can not fit through entry point while wearing harness.

Accessible area inside confined space has been modified or obstructed to a point resulting in lifelines not contributing to the rescue of entrants. If this statement applies, describe modification or obstruction:

Other. Describe conditions:

Requested By: _____ Date: _____

Approved By: _____ Date: _____

Operations Manager

NOTE: Once authorized, CSEP Pre-Entry Inspection must be updated by an ERT Member.

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RECORD OF REVISIONS

| Section | Revision Number | Effective Date | Description Of Changes |
|--|-----------------|----------------|---|
| Exhibit C | 1 | 02-24-12 | Rewrite of Confined Space Inspection Form |
| Record of Revisions | 1 | 02-24-12 | Added Record of Revisions |
| Throughout Policy | 2 | 03-06-12 | Clarified that Mill Radio was to be used for Entry. Changed to Resolute Forest Product symbol. |
| Throughout Policy and Attachments Exhibits A, B, E, E1, E2 | 3 | 02-26-16 | Updated CS Permit and associated wording in policy. Updated CS Forms (Exhibits). |
| 6.7 | 4 | 03-02-16 | Updated Entry Supervisor change requirements. |
| All | 5 | 05-31-16 | Assigned new procedure number for current format. |
| Exhibit A | 6 | 02-20-17 | Revision to CS Permit to add space for contractor information. |
| 6.1.6 Exhibit A | 7 | 03-28-23 | Addition of entry/exit requirement documentation; update to CS Permit. |
| 6.5 And CS Permit (Pg 2) | 8 | 05-22-24 | Addition of attendant requirement of speaking and understanding English in order to be able to communicate effectively with site personnel (Entry Supervisor, Security Officer, etc.) |
| Throughout Policy And CS Permit | 9 | 7/23/24 | Updated from Emergency Channel on Mill Radio to Confined Space Channel. |
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