

SOP-PRT-004 Confined Space Entry

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1.0 Introduction

This SOP is a supplement to Confined Space Entry.

Since the vessel carries no equipment or individuals qualified to measure the atmosphere, the company policy for confined space entry is consistent with 46 CFR 148.86 (a) – **it is prohibited at sea except in an emergency.**

In an emergency and consistent with the Master's authority including not to be constrained by the Company, ship owner, or charterer from making decisions that are in his professional judgment necessary for the safe operation of the vessel, 46 CFR 148.86 (b) is the controlling regulation and procedure.

2.0 Definitions

Confined spaces are potentially dangerous areas to work in due to associated hazards such as limited space for maneuvering, restricted entry/ exit, oxygen limited atmosphere or hazardous atmosphere. The OSHA definitions for confined space and permit required confined space are listed below.

Confined spaces are typically defined by meeting all of the following criteria:

- An area large enough for someone to bodily enter the space to perform work.
- An area that has limited or restricted means for entry or exit. Openings can be considered to limit entry or exit by either being small in size or difficult to access.
- The space is not designed for continuous employee occupancy. The space may be designed to only store products, enclose materials, equipment and processes. These types of spaces only require occasional employee entry for inspections, maintenance, or repair.

Title of Document:	Safety Management Manual	Document Number:	SOP-PRT-004
Authority:	Operations Director	Revision:	5a
Custodian/Owner:	Designated Person Ashore	Issue Date:	Nov 2025
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A **Permit-required confined space** has one or more of the following characteristics:

- Contains or has potential to contain a hazardous atmosphere;
- Contains material with the potential to engulf someone who enters the space;
- Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a downward sloping floor that tapers to a small cross section; and/ or
- Contains any other recognized serious safety or health hazards.

IMO Resolution A. 1050(27) 2.1 states that an **Enclosed Space** has one or more of the following characteristics:

- has limited openings for entry and exit
- has inadequate ventilation
- and is not designed for continuous worker occupation.

The **Authorized Person** signing the permit is the TDI-Brooks management representative responsible for ensuring that the permitting process and associated safety procedures to be followed meet or exceed the TDI-Brooks requirements.

- At sea, the authorized person is both the Master and the Chief Engineer (both must sign off on the permit).
- In shipyards, at the dock or in the absence of a chief engineer or Topside officer, the Authorized Person is the Port Engineer

3.0 Permit-Required Confined Spaces Register

A HAZID has been conducted and confirmed the following are the only permit-required confined spaces. The entrances to these spaces shall be clearly marked with signage or painted to indicate **“Confined Space- No Entry”**.

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SPACE	CATEGORY 1
#1 centerline ballast tank	<u>1</u>
#2 centerline ballast tank	<u>1</u>
#12 port and starboard ballast tanks	<u>1</u>
#13 centerline ballast tank	<u>1</u>
#6 port and starboard fuel oil tanks	<u>1</u>
#7 port and starboard fuel oil tanks	<u>1</u>
#8 port and starboard fuel oil tanks	<u>1</u>
#9 fuel oil day tanks	<u>1</u>
#11 port fuel tank	<u>1</u>
Lube oil tank	<u>1</u>
Dirty oil tank	<u>1</u>
Dirty bilge water tank	<u>1</u>
Potable water tanks	<u>1</u>
Grey water tank	<u>1</u>
Eng Room Smoke Filled or CO2 discharged	<u>1</u>
SPACE	CATEGORY 2
Chain locker	<u>2</u>
SPACE	CATEGORY 3
#5 starboard converted mud tank	<u>3</u>
Rudder compartment	<u>3</u>
Bilge below deck plates	<u>3</u>
Port a/c room	<u>3</u>
Starboard MSD room	<u>3</u>
#5 port tank (workout/storage room)	<u>3</u>
Transducer trunk (Chirp seachest)	<u>3</u>
Bowthruster room	<u>3</u>

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3.1 Entry at Shipyard, Dockside or Repair Facilities

Once an area identified as a confined space area is designated for possible entry, then the potential hazards associated with that space must be identified. Confined space hazards may be categorized as oxygen deficient atmospheres, flammable atmospheres, toxic atmospheres and mechanical/ physical hazards.

For this reason, any person with a potential need to enter a confined space under permit issued conditions must be trained in recognizing these hazards. At a minimum, they must have completed the Confined Space Training course on the computer-based training system.

Entries into permit required confined spaces in a shipyard or repair facility will be done under the control and authority of **the Contractor/ Facility's** safety program consistent with the requirements of 29 CFR 1915.

Before anyone may enter a permit-required confined space, a certified Marine Chemist or equally authorized person from the repair facility must have tested the atmosphere and posted a certificate at the outside of the space stating it is safe for entry. All entrants will inspect the certificate before entering to ensure it is still current and valid. Actual entrants will be limited to only those who meet the requirements of 29 CFR 1915.12 (d) and (e).

3.2 Emergency Entry Procedure

Emergency entry must follow the requirements of 46 CFR 148.86 (b) and requires four people trained in confined space entry to fill the following roles:

Supervisor- A Responsible Person must supervise the entry and maintain communications with the bridge.

The **Entrant** must:

- be trained in the use of an SCBA
- wear an SCBA and a wire rope lifeline attached to him/ her
- wear appropriate protective clothing and other applicable PPE.

The **Attendant/ Line Tender** must:

- remain outside the confined space to monitor the entrant
- have agreed on some means of communication with the entrant.

The **Standby Rescuer** must:

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- remain outside the confined space with full SCBA gear and wire rope lifeline on and ready to enter the space to assist the entrant.

4.0 Non-Permit Required Confined Spaces

The spaces designated at category 3 do not require a permit to enter.

5.0 Training and Drills

All persons participating in emergency confined space entry or rescue drills must have completed the computer-based training course as a general familiarization of the hazards of confined space.

The drill scenarios serve as additional training, since this is where we can learn the most about potential complications.

In these drills, all the steps of the process – from planning the emergency scenario to setting up rescue equipment to wearing the appropriate PPE, retractable lifelines and SCBA gear – will be followed **up to the point of entry without actually entering the space.**

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