



CT WAP Weatherization Guidance No. 25

Effective Date: October 3, 2015

Communication of Hazard and Work Site Flow

The purpose of this guidance is to instruct agencies of newly developed policy regarding hazards found to exist or having the potential to exist on WAP work sites. This guidance pertains to all CT WAP Weatherization programs.

Hazard Communication Responsibilities

Due to recent changes made to Occupational Safety and Health Administration (OSHA) in respect to work performed in confined spaces (Attics, Crawl Spaces), CT WAP has determined that a standard practice for identifying and communicating hazards be established and applied to any OSHA confined space work site.(OSHA CFR 1926.1207) (Effective August 3, 2015)

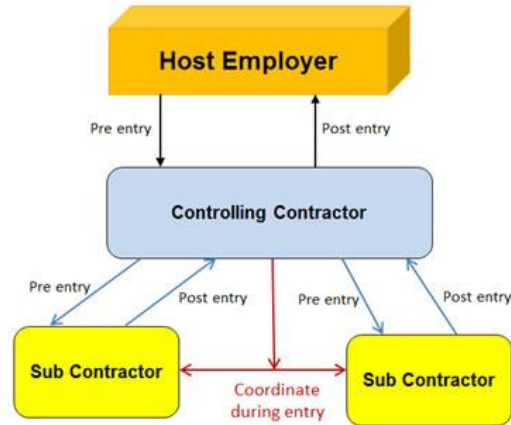
As outlined in **CT WAP Weatherization Guidance No. 24**, CT WAP Sub-Grantees will require that all personnel conducting site specific energy audits, in-process inspections and Final Inspections to document and communicate site specific hazards to ensure the safety of all Weatherization service delivery personnel and the occupants of the site.

Upon completion of a site specific audit and **Pre-Entry Hazard Assessment** form, the local agency is responsible for communicating any hazard in conjunction with any work order issued for work within a designated confined space. At that point the local agency is recognized as both the **Host Employer** and the **Controlling Contractor**.

**Also applicable in the event those local agency employees are performing Weatherization service delivery or managing on-site activities.*

Local agency crews and subcontractors will be recognized as **Entry Employers** and **Entry Employees**.

(See info-graphic below)



The above diagram shows the information flow and coordination between these employers

The rule makes the **controlling contractor**, rather than the **host employer**, the primary point of contact for information about permit spaces at the work site. The **host employer** must provide information it has about permit spaces at the work site to the **controlling contractor**, who then passes it on to the employers whose employees will enter the spaces (**entry employers**). Likewise, **entry employers** must give the **controlling contractor** information about their entry program and hazards they encounter in the space, and the **controlling contractor** passes that information on to other **entry employers** and back to the host. As mentioned above, the **controlling contractor** is also responsible for making sure employers outside a space know not to create hazards in the space, and that **entry employers working in a space at the same time do not create hazards for one another's workers**.

Hazard Communication Documentation/Recordkeeping

As defined in the above info-graphic, all documentation regarding on site confined space entry activity must include pre-entry and post-entry to the **Controlling Contractor** and **Host Employer** and maintained within the file in accordance with **CT WAP Weatherization Guidance No. 24**.

This documentation must include the **Pre-Entry Hazard Assessment Form**, **Confined Space Entry Permits** and any changes made to the original **Work order** or **Scope of Work** as a result of OSHA Confined Space compliance.

Note: any changes to work scope or work orders must contain documented approval by the Host Employer, Controlling Contractor and or CT WAP Monitoring or may result in disallowed costs.