

I. BACKGROUND AND PURPOSE

- a. To establish, implement and maintain a Confined Space program for Warner Bros. Studio Operations (WBSO)
- b. To evaluate and identify if any spaces are permit-required confined spaces.
- c. To protect the health and safety of employees by providing them with instructions and working procedures for safely entering and working in confined spaces.
- d. To assist supervisors, employees, and contractors to comply with California Code of Regulations, Title 8, Section 5157. Permit-Required Confined Spaces. This program provides guidance, and when followed, should prevent or minimize the potential for employee/contractor injury or illness resulting from work being performed in, or near, confined spaces.

NOTE: This program is applicable to all departments, employees, and contractors whose activities or tasks require entry into any permit and/or non-permit-required confined spaces.

II. DEFINITIONS

- a. **Acceptable Entry Conditions** – the conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter into and work within the space.
- b. **Air Monitoring Instrument** – a portable instrument capable of detecting hazardous levels in air of those contaminants typical of confined spaces found on WBSO property.
- c. **Attendant** – a person stationed outside one or more confined spaces who monitors the entrants.
- d. **Blanking or blinding** – the absolute closure of a pipe, line, or duct by the fastening of a solid plate that completely covers the bore and that can withstand the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.
- e. **Confined Space** – a space is classified as being “confined” if it includes all of items 1-3, in addition to one of items 4-7 listed below, it is considered a **Permit-Required Confined Space**:
 1. The space must be large enough to allow an employee to enter and perform work.
 2. The space must have limited, or restricted, means of entry or exit (difficult to enter and leave due to narrow passageways and hatches or areas where the configuration of the facility increases employee risk by hindering evacuation and rescue efforts).
 3. The space is not designed for continuous employee occupancy (spaces were created to contain such things as power cable vaults, manholes, crawlspaces, plumbing pits).
 4. The space contains, or has the potential to contain, air that is unsafe to breathe (e.g. poor ventilation which can cause the build-up of harmful gases).
 5. The space contains a type of material (e.g. fine sand, grain) which can create engulfment or quicksand effect and potentially entrap the employee.
 6. The space has an internal configuration such that the employee could be trapped or asphyxiated by inwardly converging walls or a floor which slopes downward and tapers to a smaller cross section.

7. The space contains any other serious safety or health hazards(e.g. corrosive chemicals); immediately dangerous to life or health (IDLH).
- f. **Double Block and Bleed** – the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.
- g. **Emergency** – any occurrence (including any failure of hazard control or monitoring equipment) or event inside the confined space or external to the space that could endanger entrants and attendees.
- h. **Engulfment** – being surrounded and captured by a liquid of finely divided (flowable) solid substance that can be breathed in and cause asphyxiation or that can exert sufficient force on the body to constrict or crush it.
- i. **Entrant** – A person who is entering a confined space.
- j. **Entry** – 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.
- k. **Entry Permit** – A document that contains specific information to a particular entry that identifies the space, the purpose for entering, date and duration of entry, authorized entrants, and listed hazards, etc. (see Appendix A-*Confined Space Entry Form*)
- l. **Entry Supervisor** – the person (such as the employer, foreman, or supervisor) responsible for determining if acceptable entry conditions are met at a permit-required confined space where entry is planned, authorized, and terminating entry as required.
- m. **Hazardous Atmosphere** – an atmosphere (air) that may expose employees to the risk of death, incapacitation, affect their ability to escape under their own will, or cause injury/acute illness from one or more of the following causes:
 1. Flammable gas, vapor or mist exceeding 10% of its lower flammable limit (LEL);
 2. Combustible dust at a concentration exceeding its LEL;
 3. Oxygen levels less than 19.5% or greater than 23.5%;
 4. Atmospheric concentration in excess of any substances permissible exposure limit (PEL) and/or short-term exposure limit (STEL)
 5. Any atmospheric condition immediately dangerous to life of health (IDLH)
- n. **Hot Work Permit** – means the employer's written authorization to perform operations (e.g. riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.
- o. **Immediately Dangerous to Life or Health (IDLH)** – any condition that creates an immediate or delayed threat to life or that can cause irreversible adverse health effects if prolonged. This includes any health effects which would interfere with an employee's ability to escape unaided from a confined space.
- p. **Inerting** - means the displacement of the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible.
- q. **Lower Explosive Limit (LEL)** – the lowest concentration of a flammable gas or vapor (% by volume in air) at which an explosion can occur if ignited.
- r. **Permit-required confined space program (permit space program)** – means the employer's overall program for controlling, and, where appropriate, for protecting employees from, permit space hazards and for regulating employee entry into permit spaces.

- s. **Prohibited Condition** – any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
- t. **Rescue Services** – personnel designated to rescue employees or contractors from confined spaces (e.g. WBSO Fire Department Engine 18, Burbank Fire Department Station 12).
- u. **Retrieval system** – means the equipment (including tripod, a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.
- v. **Testing** – the process by which the hazards that may confront entrants of a permit space are identified and evaluated. Testing enables a person to devise and implement adequate control measures for the protection of authorized entrants and to determine if acceptable entry conditions are present immediately prior to, and during entry.

III. GENERAL REQUIREMENTS

1. The employer shall assess and document the workplace to determine if any spaces are permit-required confined spaces. (See ***Confined Space Assessment Form.***)
2. The employer shall inform employees and contractors of the existence, location and danger posed by permit spaces by posting danger signs or by using any other equally effective means (e.g. A sign reading “DANGER – PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER” or using other similar language would satisfy the requirement for a sign).
3. The **Attendant** shall document the basis for determining that all hazards in a permit space have been eliminated through a certification that contains the date, the location of the space, and the signature of the person making the determination. The certification shall be made available to each entrant entering the space or to the employee’s authorized representative. (See ***Confined Space Entry Form.***)
4. When an employer (host employer) arranges to have employees of another employer (contractor) perform work that involves permit space entry or confined space entries covered by section 5157 and 5158, the host employer shall:
 - a. Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section.
 - b. Inform the contractor of the elements, including the hazards identified and the host employer's experience with the space, that make the space in question a permit space;
 - c. Inform 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.
 - d. Coordinate entry operations with the contractor, when both host employer personnel and contractor personnel will be working in or near permit spaces; and
 - e. Debrief the contractor at the conclusion of the entry operations regarding the permit spaced program followed and regarding any hazards confronted or created in permit spaces during entry operations.

IV. RESPONSIBILITIES

- a. Electrical Construction, Plumbing Department, Air Conditioning Department, Telecommunications Department and Construction Services, are responsible for:
 1. Surveying their work areas and employee tasks to identify all confined spaces in their areas of responsibilities.
 2. Identifying any specific tasks that may require entry into a confined space(s).
 3. Supplying the appropriate equipment needed to enter into permit confined spaces (e.g. forced air blower, air monitoring device, barricades, etc.).

NOTE: Where questions arise pertaining to the actual space meeting the definition of a confined space, the Safety and Environmental Affairs (S&EA) department must be notified to resolve this conflict.

- b. **The Safety & Environmental Affairs department is responsible for:**
 1. Establishing and updating requirements and written procedures for confined space operations.
 2. Serving as the **Advisor** to WBSO departments with respect to the identification of confined spaces and required safety procedures.
 3. Providing employees with working familiarity (hands on experience) on how to use air monitoring instruments.
 4. Providing air monitoring instrument as requested by all WBSO departments.
 5. Maintaining calibration records for all air monitoring instrument.
- c. **Managers/Supervisors are responsible for:**
 1. Enforcing the procedures contained in this written program.
 2. Selecting supervisors/attendants/entrants. All WBSO departments with confirmed confined space(s) must identify them and inform all employees, contractors, and their supervisors, of those locations and of the tasks that involve, or will require confined space operations to be performed.
 3. Ensuring that all applicable WBSO department employees working are trained, up to date, and comply with the procedures of this written program.
 4. Providing and maintaining any equipment used in confined space work.
 5. Maintaining records pertaining to employee training and confined space entry permits for one year.
 6. Notifying S&EA before any confined space entry is made by their WBSO department employees or contractors.
- d. **Employees are responsible for:**
 1. Following all confined space guidelines contained in this program.
 2. Being trained and up to date on confined space procedures.
 3. Reporting unanticipated hazards, equipment defects, injuries, and illnesses to their supervisors immediately.
- e. **Contractors Awareness, Duties and Responsibilities:**
 - i. When the host employer arranges to have employees of another employer (contractor) perform work that involves permit space entry, the host employer shall:

**WARNER BROS. STUDIO OPERATIONS
SAFETY & ENVIRONMENTAL AFFAIRS**



SAFETY REFERENCE MANUAL

California Code of Regulations, Title 8, Section §5157

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Last Revised: August, 2025

1. Inform the contractor in writing that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements set forth by Cal/OSHA (e.g. California Code of Regulations, Title 8, Section 5157).
 2. Apprise the contractor of the elements, including the hazard(s) identified and the host employer's experience with the space, that make the space in question a permit-required confined space.
 3. Apprise the contractor of any precautions or procedures that the host employer has implemented for the protection of employees in or near the permit space where contractor personnel will be working.
 4. Coordinate entry operations with the contractor when both host employer personnel and contractor personnel will be working in or near permit spaces.
 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.
- ii. All records associated with the above section shall be maintained as a part of the permanent record with the terminated entry permit(s).
 - iii. Each contractor who is retained to perform work that will require permit space entry operations shall:
 1. Obtain any available information regarding permit space hazards and entry operations from the host employer.
 2. Coordinate entry operations with the host employer when both the contractor and host employee personnel will be working in or near permit spaces, and inform the host employer of the permit space program that the contractor will follow and of any hazards confronted or created in permit spaces, either during a debriefing or during entry operations.

f. Attendants are responsible for:

- i. Being aware of the potential hazards of the particular confined space being entered, to include signs/symptoms (especially behavioral) of exposure to the hazard(s).
- ii. Maintaining an accurate count of confined space entrants.
- iii. Identifying entrants and verifying confined space training records.
- iv. Remaining stationed outside the confined space until he/she has been relieved or until all entrants have exited the confined space and the site has been secured.
- v. Maintaining communications with entrants as required to monitor their status or to alert them for the need to evacuate the space. The attendant will order a confined space evacuation when one or more of the following conditions exists:
 1. Changes in the behavior of an entrant that could be the result of the entrant's exposure to a hazardous substance.
 2. Failure or malfunctioning air monitoring instrument.
 3. Any condition that is IDLH to the attendant and/or entrant.
 4. The air monitoring equipment indicates that an airborne hazard may exist outside of acceptable limits.

CAUTION: Entry of attendant(s) into a confined space to perform, or assist, in actual rescue operations **is prohibited** unless the attendant(s) has been **properly relieved** of his/her primary duty and has been **properly trained** in entry and rescue operations.

g. **Entrants are responsible for:**

- i. Knowing the type(s) of hazards associated with confined space operations to include the signs, symptoms, and the consequences of being exposed to them.
- ii. Being familiar with the use of any equipment associated with the entry into confined spaces (e.g. 4 gas meter, tripod winch).
- iii. Maintaining continuous communications with the **Attendant** and can alert the on-duty **Attendant** whenever the **Entrant** recognizes any warning signs/symptoms of exposure to a hazardous condition.
- iv. Exiting the confined space when ordered to do so by the **Attendant**, supervisor, authorized S&EA department personnel, or whenever an **Entrant** recognizes any of the warning signs/symptoms of exposure to a hazardous condition including the sounding of instrument alarms.

h. Entry Supervisors are responsible for:

- i. Determines safe entry to **Permit-Required Confined Spaces**, authorizes and oversees the entry – Terminates entry as needed.
- ii. Can also act as the attendant or entrant, **if trained and equipped** for those roles.
- iii. Ensures hazards are eliminated or controlled.

NOTE: If the confined space is abated and does not need a permit, an entry supervisor is not needed.

V. TRAINING

- a. To ensure safe and efficient operations in confined spaces, all personnel including employees and contractors must be adequately trained in confined space programs and operations. This includes understanding their roles and responsibilities, completing entry permits, conducting safe confined space entry, and following standard and emergency rescue procedures. No one shall enter a confined space without proper training.
- b. Employees must receive refresher training whenever there are deviations in the entry procedures or if there are any gaps in their knowledge of the procedures. This is necessary to maintain their competence and ensure safe operations in confined spaces

VI. RECORDKEEPING

- a. Routine atmospheric testing conducted should be kept for at least one year.
- b. All entry and cancelled permits should be kept for at least one year.

VII. PROCEDURES

- c. **Equipment Acquisition:** each department is responsible for requesting confined space equipment through their department supervisor.
 1. **Maintenance** – S&EA will maintain inspection records of confined space equipment.

2. **Calibration** – the S&EA will arrange for quarterly factory-style calibrations, which shall include instrument testing and sensor/parts replacement in conformance with the manufacturer's recommendations.
3. **Inspection** – each department must inspect the confined space meter to ensure it is working properly prior and after each use.
4. **Recordkeeping** – S&EA will maintain or have access to all employees/supervisor confined space training records and entry permits. Union employees' training records are available on-line at the CSATF Safety Pass website: <https://portal.csatf.org/roster/general> (Online Roster)
- d. **Confined Spaces:** as defined in this program are found throughout the Main and Ranch Lot. Examples include, but are not limited to:
 1. Substage pit
 2. Underground storage tank
 3. Manhole
 4. Ventilation and exhaust duct
 5. Underground utility vault
 6. Process tank
 7. Storm water drainage
 8. Cyclone baghouse
 9. Pipeline
 10. Sump
 11. Boiler
 12. Sewer
 13. Water supply tower
- e. **Pre-Entry Procedures:** before entering a confined space, the following actions must be completed:
 1. Notify S&EA of the nature of the work.
 2. Entry Permit(s) must be completed and reviewed with employees assigned to be either an Attendant or Entrant. A copy of the permit must be submitted to S&EA at the completion of the job.
 3. The proper confined space entry equipment must be functioning properly at the worksite(s).
 4. Communications between the Attendant and the Entrant(s) must be maintained regardless of the configuration/depth of the confined space.
- f. **Air Monitoring:**
 - i. Air monitoring must be performed prior to entry into a confined space.
 - ii. Air monitoring must be performed continuously by one of the employees who must use an air monitoring instrument while the entrant is working within the confined space.
 - iii. The air monitoring instrument must be capable of measuring oxygen, combustibles (e.g. methane), hydrogen sulfide, and carbon monoxide.
 - iv. When testing for atmospheric hazards, the tests for various gases will be performed in the following sequence:
 1. Oxygen levels

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2. Combustible gases/vapors
3. Toxic gases/vapors (e.g. hydrogen sulfide (H₂S), carbon monoxide (CO))
- v. Air monitoring devices must be capable of sounding an audible alarm when the following condition exists:
 1. Oxygen levels are at or below 19.5%
 2. Oxygen levels are at or above 23.5%
 3. Combustible gas levels reach or exceed 10% of the lower explosive limit (LEL)
 4. Any peak limits have been reached (H₂S – 50 ppm, CO – 200 ppm)
 5. Short term exposure limits (STEL) have been reached (H₂S – 15 ppm, CO – 100 ppm)
 6. Permissible exposure limits (PEL) are reached (H₂S – 10 ppm, CO – 35 ppm)
- vi. Ventilation: a continuous supply of air (natural or forced) shall be provided to the confined space while work is being performed in the confined space and any of the following conditions exists:
 1. A toxic gas or oxygen deficiency is found.
 2. Combustible or explosive gas vapors were initially detected and subsequently reduced to a safe level by ventilating the area.
 3. Organic solvents will be used during the work procedure.
 4. Open flame torches (e.g. torch cutting, welding, hot work) will be utilized.
 5. The confined space is in a public right of way open to vehicular traffic and/or exposed to the seepage of gas or gases.
- vii. Communication Equipment: a means of communicating directly with professional rescuers (via portable radios) or indirectly (e.g. mobile phone, land line)
- g. **Retrieval system:**
 - i. Equipment required for rescue operations will at a minimum consist of the following items that must be on-site:
 1. Tripod (or fixed equivalent)
 2. Winch
 3. Self-Retracting Lifeline with Full Body Harness
- h. **Emergency Rescue Procedures:**
 - i. Attendant(s): in case of emergency, the attendant will immediately call for assistance **818-954-3333** on any mobile phones or **4-3333** on any land line; emergency fire, medical, and security hotline for emergency rescue. Employees suffering obvious physical injuries in the absence of a hazardous atmosphere should not be moved unless directed by emergency rescue personnel (e.g. WBSO Engine 18 Fire Department, Burbank Fire Department Station 12) or an immediate threat is present (e.g. fire).
 - ii. WBSO Engine 18 Fire Department – first responder to isolate the scene and assess the situation.
 - iii. Burbank Fire Department Station 12 – the agency having jurisdiction on all matters concerning rescue.
 - iv. Security – establish a perimeter for first responders and emergency rescue personnel.

- v. Entrant(s): if conscious and able to perform self-rescue shall safely exit the confined space. If for any reason unable to perform self-rescue will wait until the necessary help arrives on the scene.

VII. PROGRAM REVIEW

The WBSO Confined Space Program will be reviewed and updated periodically by S&EA to determine effectiveness in preventing employee incidents and to maintain compliance with regulatory requirements.

