



A SAFETY TIP FOR OUR MEMBERS FROM . . .



EMERGENCY PLANNING

OSHA Compliance Advisor, April 23, 2007

Get a head start on the next Hurricane Season - we can help you develop your Emergency Plan—CALL US !

A significant requirement for ensuring the safety of working men and women is OSHA's rule at 29 CFR 1910.38, which deals with how to prepare for potential emergencies and how to act if they should occur. The most likely emergencies would include fire, chemical spills, and natural disasters such as tornadoes, floods or earthquakes. But these days, the possibility of workplace violence, bomb threats, and biological agents must also be considered – and prepared for.

Emergency Action Plan (EAP)

Employers must have an emergency action plan, in writing, if there are more than 10 employees, which must be explained to workers and kept readily available for review. The plan must contain, at a minimum, procedures for:

- Reporting a fire or other emergency (e.g., by a required alarm system) – and then dealing with it,
- Evacuation (including exit-route assignments);
- Managing critical plant operations by assigned employees before they evacuate;
- Accounting for all employees after evacuation;
- Providing rescue or medical duties; *and*
- Names or job titles of people who can be contacted for information about the plan.

All employees must be trained in how to follow the plan, and those with special duties must receive further special training.

An appendix to the standard offers non-mandatory, but helpful, guidance. For example: providing floor plans or workplace maps that clearly show escape routes; attending to the needs of handicapped persons who may need assistance (perhaps by use of a buddy system); and coordinating plans with other employers in a building with several places of employment.

Emergency Response Plan (ERP)

Yet another OSHA standard dealing with required behavior in emergency conditions is in 29 CFR 1910.120 –

Hazardous Waste Operations and Emergency Response.

It also requires employers to “develop and implement” a written safety and health program for employees involved in such operations that include pre-emergency planning and coordination with outside parties, personnel roles, lines of authority, communication, and emergency recognition and prevention. The program is to be available to employees and as well to employee representatives, contractors, subcontractors, OSHA personnel, and “other federal, state, or local agencies with regulatory authority over the site.”

All employees who will be dealing with potentially hazardous sites or activities must:

- Undergo intensive training;
- Be provided with appropriate personal protective equipment, including respirators;
- Be covered by medical surveillance and monitoring, as appropriate;
- Have available safe distances and places of refuge adequate for all employees who may need them;
- Be aware of evacuation routes;
- Have emergency medical treatment and first aid available.

The response plan must address emergency alerting and response procedures; the types and uses of PPE and emergency response equipment to be used; and the setting up of a decontamination station and the decontamination of personnel and equipment.

It also provides procedures for the critique of response and follow-up.

And Also . . .

It will be important for companies to be aware of programs established by the Department of Homeland Security, to learn as much information as possible about that agency's requirements, and to follow any instructions provided.

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1145 Court Street, Clearwater, FL 33756

Phone: (727) 373-7233 Fax: (727) 442-2321 E-Mail: safety@safety.org

Visit our website at www.safety.org