

Emergency action plans



Manuel L. Peralta Jr.

In January, my column listed a number of references to the employer's obligations as defined through the Occupational Safety and Health Act (OSHA), which are referenced in the *Employee and Labor Relations Manual (ELM)*. Adding to that information we find management's responsibility spelled out as follows in §852.1 of the *ELM*:

Each Postal Service facility with more than 10 employees on the rolls must maintain an emergency action plan (EAP) in writing. If there are 10 or fewer employees, the plan may be communicated verbally...The plan must include actions specifically designated for management and for employees to take to

ensure employee safety and protection of property from fire and other emergencies (e.g., tornadoes, earthquakes, and hazardous materials (HAZMAT) spills). Management Instruction EL-810-2006-3, Response to Hazardous Materials Release, provides guidelines for setting up standard operating procedures (SOPs) for releases and describes the relationship of the SOP to the EAP.

Combine the above with the responsibilities of the Installation Safety Committee. *Handbook EL-809* (12 pages) details the duties and responsibilities of the Local Safety Committee, which includes the following item:

Determine program areas to receive increased emphasis and make recommendations regarding them.

This passage places an overall responsibility on the members of the Installation Safety and Health Committee. Think of all that falls under this umbrella. For example, we have weathered a number of hurricanes over the last few years. We know that there will be more. We know that we will have to react. And yet, each and every year, there is a scramble at the installation and district (division) level to make sure we are reacting appropriately. Adding to this anxiety is your need to protect your families. Were we all prepared?

The above quote from the *EL-809*, when read together with the obligations from §852 of the *ELM*, put us all on notice to prepare for the worst. Prepare for the disasters that we can expect in our area. If you live and work in an area that experiences tornados, hurricanes, earthquakes, flooding rains or any other weather-related disasters, then you should be evaluating all that is known so that we can determine if we are following the sound advice of

the experts. In your evaluation, you should dive into the last events and determine if all was done as planned.

For example, look at how your area reacted to the last disaster:

- Did your installation have an emergency action plan in writing? If not, why?
- Was the plan known by all employees? If not, why?
- Was it followed by all employees (craft and management)? If not, why?
- Did the existing plan address all the events experienced? If not, what do we have to revise to make sure we have those issues covered next time?

EL-809 continues with the following responsibilities of the Installation Safety Committee:

Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.

Review Forms 1767, Report of Hazard, Unsafe Condition, or Practice, and responses or corrective action taken. These two simple duties can make a world of difference in changing how we do our jobs and how we make our workplace safer.

These two additional items, tied in with the above, make clear that the committee's responsibility is to look for what to expect, create a plan, and then evaluate the plan's effectiveness.

This month, the elected national officers of the NALC take the oath of office for the 2022-2026 term of office. I want to thank you for your support, your friendship and your confidence in me, and the team that you have elected, as we begin our next term of office. I also want to thank those of you who exercised your democratic right to determine the national and regional officers of this wonderful union.

As I close, my family and I wish you a very merry Christmas and a happy new year. May we embrace each other's beliefs and continue to serve this great country.

Stay strong. Stay safe. And keep an eye on each other.

