

# Emergency action plans



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**C**hapter 850 of the *Employee and Labor Relations Manual (ELM)* directs installation heads with the responsibility of implementing emergency action plans and a fire safety program, as required by Occupational Safety and Health Administration (OSHA) regulations at 29 CFR 1910 Subpart E (Exit Routes and Emergency Planning) and Subpart L (Fire Protection).

Section 851.1 of the *ELM* requires the following, as relating to:

- a. Training,
- b. Education,
- c. Inspection,
- d. Enforcement,
- e. Drills,
- f. Emergency evacuation teams,
- g. Written emergency action plans,
- h. Written standard operating procedures for hazardous materials releases, and
- i. Fire prevention plans as required in this subchapter.

## Have you been fully trained on the above?

Have you been provided with a copy of the emergency action plans? If not, have you been provided the time to review the plans to understand what steps were mapped out by management?

If you have not been trained and/or have not been able to review the plan, approach your supervisor and ask for an opportunity to review it. If your supervisor does not provide you with access, see your shop steward or branch officers.

Once you have reviewed the emergency action plans, are you satisfied that they cover all of your concerns? Do you have any suggestions to improve the plan? If you have concerns or ideas to make the plan better, approach your union representatives on the installation safety committee; otherwise, speak with your shop steward or, if necessary, with your union officers.

If you are the NALC's designee on the installation's safety committee, we would recommend that you review the emergency action plan and address any concerns during an upcoming safety committee meeting.

**The following sections of 29 CFR 1910 should be evaluated** when assessing the validity of the emergency action plan:

## 1910.36(b)(1)

Two exit routes. At least two exit routes must be available in a workplace to permit prompt evacuation of employees and other building occupants during an emergency, except as allowed in paragraph (b)(3) of this section. The exit routes must be located as far away as practical from each other so that if one exit route is blocked by fire or smoke, employees can evacuate using the second exit route.

### Interpretation by OSHA:

...The Occupational Safety and Health Administration's general industry safety and health standards in 29 CFR [1910.36(g)(2)] requires that the minimum width of any way of exit access shall in no case be less than 28 inches... (Nov. 27, 1978)

## 1910.37(a)(1)

Exit routes must be kept free of explosive or highly flammable furnishings or other decorations.

## 1910.37(a)(2)

Exit routes must be arranged so that employees will not have to travel toward a high hazard area, unless the path of travel is effectively shielded from the high hazard area by suitable partitions or other physical barriers.

## 1910.37(a)(3)

Exit routes must be free and unobstructed. **No materials or equipment may be placed, either permanently or temporarily, within the exit route.** The exit access must not go through a room that can be locked, such as a bathroom, to reach an exit or exit discharge, nor may it lead into a dead end corridor. Stairs or a ramp must be provided where the exit route is not substantially level. (Emphasis added)

## 1910.37(e)

An employee alarm system must be operable. Employers must install and maintain an operable employee alarm system that has a distinctive signal to warn employees of fire or other emergencies, unless employees can promptly see or smell a fire or other hazard in time to provide adequate warning to them. The employee alarm system must comply with § 1910.165.

Sometimes the rule is clear and sometimes the rule needs to be clarified.

OSHA's 1978 interpretation letter, as quoted above, requires a clear and unobstructed path of at least 28 inches. The regulation (29 CFR 1910.37(a)(3)) requires that there be no material or equipment placed in that path, on a permanent or temporary basis.

In the event of an emergency: Is your exit path a clearly marked safe exit, unimpeded by any obstruction, or is it an obstacle course that clearly violates the above?

**Get involved and help make your workplace safer.**