ESOURCE NEWSLETTER

What is Safety and Emergency Preparedness?

Emergencies and disasters can strike anywhere and at any time bringing workplace injuries and illnesses with them. Employers and workers may be required to deal with an emergency when it is least expected and proper planning *before* an emergency is necessary to respond effectively.

This webpage is designed to help workers and employers plan for that possibility. The best way to protect workers is to expect the unexpected and to carefully develop an emergency action plan to guide everyone in the workplace when immediate action is necessary. Planning in advance helps ensure that everyone knows what to do when an emergency occurs.

What is a workplace emergency?

A workplace emergency is a situation that threatens workers, customers, or the public; disrupts or shuts down operations; or causes physical or environmental damage. Emergencies may be natural or man-made, and may include hurricanes, tornadoes, earthquakes, floods, wildfires, winter weather, chemical spills or releases, disease outbreaks, releases of biological agents, explosions involving nuclear or radiological sources, and many other hazards. Many types of emergencies can be anticipated in the planning process, which can help employers and workers plan for other unpredictable situations.



What is an emergency action plan?

An emergency action plan (EAP) is intended to facilitate and organize employer and worker actions during workplace emergencies and is recommended for all employers. Well-developed emergency plans and proper worker training (i.e., so that workers understand their roles and responsibilities within the plan) will result in fewer and less severe worker injuries and less damage to the facility during emergencies. A poorly prepared plan may lead to a disorganized evacuation or emergency response, resulting in confusion, injury, illness (due to chemical, biological and/or radiation exposure), and/or property damage. Two OSHA standards (<u>29 CFR 1910.38(a)</u> and <u>29</u> <u>CFR 1926.35</u>) require written EAPs. Not all employers are required to establish an EAP (see section titled "Am I required to have an Emergency Action Plan (EAP)" to see if your business is required), but developing an EAP is a good way to protect workers and businesses during an emergency. Emergency preparedness is a wellknown concept in protecting workers' safety and health.

Putting together a comprehensive emergency action plan involves conducting a hazard assessment to determine what, if any, physical or chemical hazards inside or from outside the workplaces could cause an emergency. The plan should describe how workers will respond to different types of emergencies, taking into account specific worksite layouts, structural features, and emergency systems. If there is more than one worksite, each site should have an emergency action plan.

Most organizations find it beneficial to include a diverse group of representatives (management, workers, local health departments and agencies, and public safety officials/members) in this planning process and to meet frequently to review progress and allocate development tasks. Outside representatives from federal, state and local agencies may be able to assist organizations with incorporating other requirements or guidelines into their EAPs. The commitment and support of all workers and employers is critical to the plan's success in the event of an emergency; ask for worker input in developing and implementing an EAP. For smaller organizations with 10 or fewer workers, the plan does not need to be written and may be communicated orally (General Industry Standard - 29 CFR 1910.38(b), Construction Industry Standard - <u>29 CFR 1926.35(e)(3)</u>).

IMEA 2024 CALENDAR OF EVENTS

JULY

July 23 - 24 IMEA Insolate & Isolate Workshop (Frankfort, IN.)

AUGUST

August 5 - 9, 2024 IMEA 612 Intermediate workshop Class# 082222 (Frankfort, IN.)

SEPTEMBER

September 9 - 13, 2024 IMEA 613 Advanced Construction and Maintenance Workshop (#092721) (Frankfort, IN.) September 23 - 27, 2024 IMEA 611 Basic Construction and Maintenance Workshop (#102323) (Frankfort, IN.)

OCTOBER

October 8 - 10, 2024 - IMEA Annual Business Meeting & Vendor Expo (Bloomington, IN.)

October 21, 2024 - November 1, 2024 IMEA 610 Wood Pole Climbing Workshop (#102124) (Frankfort, IN.)

AM I REQUIRED TO HAVE AN EMERGENCY ACTION PLAN (EAP)?

Workplaces covered by the following standards may be required to have an <u>EAP</u>:

- Process Safety Management of Highly Hazardous Chemicals (in general industry, <u>29 CFR 1910.119</u>; in construction, <u>29 CFR 1926.64</u>)
- Fixed Extinguishing Systems, General (<u>29 CFR</u> <u>1910.160</u>)
- Fire Detection Systems (<u>29 CFR 1910.164</u>)
- Grain Handling (<u>29 CFR 1910.272</u>)
- Ethylene Oxide (<u>29 CFR 1910.1047</u>)
- Methylenedianiline (in general industry, <u>29 CFR</u> <u>1910.1050</u>; in construction, <u>29 CFR 1926.60</u>)
- 1,3-Butadiene (<u>29 CFR 1910.1051</u>)

Under OSHA's fire extinguisher standard, <u>29 CFR</u> <u>1910.157</u>, an EAP is required if the employer:

- wishes to comply with only paragraphs (e) and (f) of the standard when providing extinguishers that are not intended for employee use, or
- when the employer does not provide extinguishers and intends to totally evacuate the workplace on the sounding of the fire alarm.

If you are still unsure about whether you are required to have an EAP, use <u>OSHA's Expert System</u> to help you determine your EAP requirements.

AT A MINIMUM, FOR BUSINESSES THAT ARE REQUIRED TO HAVE AN EMERGENCY ACTION PLAN (EAP), THE PLAN MUST INCLUDE:

- A preferred method and/or procedures for reporting fires and other emergencies (<u>29 CFR 1910.38(c)(1)</u> and <u>29 CFR 1926.35(b)(5)</u>);
- Emergency escape procedures and route assignments, such as floor plans, workplace maps, and safe or refuge areas (example shown below) (<u>29</u> <u>CFR 1910.38(c)(2)</u> and <u>29 CFR 1926.35(b)(1)</u>);
- Procedures to account for all workers after an evacuation, such as designating an assembly location (e.g., a safe/refuge area) (29 CFR 1910.38(b)(4) and 29 CFR 1926.35(b)(3));



Example Evacuation Floor Diagram

- Names, titles, departments, and telephone numbers of individuals both within and outside the company to contact for additional information or explanation of duties and responsibilities under the emergency plan (<u>29</u> <u>CFR 1910.38(c)(6)</u> and <u>29 CFR 1926.35(b)</u> (<u>6)</u>);
- Procedures for workers who remain to perform or shut down critical plant operations, operate fire extinguishers, or perform other essential services that cannot be shut down for every emergency alarm before evacuating (<u>29 CFR</u> <u>1910.38(c)(3)</u> and <u>29 CFR 1926.35(b)(2)</u>); and
- Rescue and medical duties for any workers designated to perform them (<u>29 CFR</u> <u>1910.38(c)(5)</u> and <u>29 CFR 1926.35(b)(4)</u>).

IN ADDITION, ALTHOUGH NOT SPECIFICALLY REQUIRED BY OSHA'S EAP STANDARD, OTHER EMERGENCY PREPAREDNESS ACTIONS INCLUDE:

- Posting emergency numbers in the workplace for the fire brigade, fire department, and other appropriate emergency responders;
- Inviting external emergency responders to tour the facility to learn about hazards, the facility's processes, protective features and systems, and proper actions to take (or not to take) during emergencies. Tours should account for different shifts of firefighters;
- Coordinating tours for volunteer firefighters at times that accommodate their work schedules;
- Arranging training drills for responders and facility personnel to practice emergency procedures together;
- Designating a facility liaison to coordinate with emergency responders and keep them updated if hazards or processes change;
- Designating one or more emergency contact persons that are knowledgeable of the facility's hazards and processes and ensure their contact information is quickly accessible during emergencies;
- Designating staff responsible to inventory and maintain emergency equipment and supplies;
- Including a description of the alarm system in the emergency plan to be used to notify workers (including disabled workers) to evacuate and/or take other actions. The alarms used for different actions should be distinctive and might include horn blasts, sirens, or even public address systems;
- Identifying the site of an alternative facility for communications to be used in the event the primary facility is inaccessible because of emergencies, such as a fire or explosion; and

 Storing original or duplicate copies of accounting records, legal documents, worker emergency contact lists, building plans, HAZMAT lists, and other essential records at a secure on-site or off-site location.

HOW TO ALERT WORKERS OF AN EMERGENCY?

If a business is required to have an EAP, the plan must include a way to alert workers, including disabled workers, to evacuate or take other action (see <u>29 CFR 1910.38(d)</u> and <u>29 CFR</u> <u>1926.35(c)</u>). These standards require:

- Employers to ensure that alarms are distinctive and recognized by all workers as a signal to evacuate the work area or perform actions identified in the plan; and
- Alarms to be able to be heard, seen, or otherwise perceived by everyone in the workplace. Local fire codes require an auxiliary power supply in the event that electricity is shut off. (<u>29 CFR 1910.165(b)</u> (<u>2)</u> offers requirements for alarms.)

The EAP must also state how employees are to report emergencies. Employers should consider making available an emergency communication system, such as a public address system, portable radios, or other communications tools to assist in contacting local law enforcement, the fire brigade (if provided), the fire service (e.g., local fire department), and others. These communication systems may also serve as additional means of notifying workers of an emergency. Employers should also provide an updated list of key personnel such as the plant manager or physician, in order of priority, to notify in the event of an emergency during off-duty hours. The Employee Alarm Systems standard (<u>29 CFR</u> <u>1910.165</u>) is also aimed at ensuring alarms are able to be perceived by all workers at a worksite, including those with physical impairments (see OSHA's 1990 <u>interpretation</u> of the standard). Accordingly:

- Use visual devices to alert hearing-impaired workers (in addition to audible devices); and
- Use tactile devices to alert visually-impaired workers (in addition to audible and visual devices).

Emergency Plan and Evacuation Coordinators

When drafting an emergency action plan, consider selecting a responsible individual to lead and coordinate the emergency plan and evacuation. It is critical that workers know who the coordinator is and understand that the coordinator has the authority to make decisions during emergencies.

The Coordinator should be responsible for:

- Assessing the situation to determine whether an emergency exists and if so, requiring activation of emergency procedures;
- Supervising all emergency efforts in the area, including evacuating personnel;
- Ensuring that external emergency services, such as the local fire department or emergency medical service, are available and notified when necessary; and coordinating these services when they arrive on site; and
- Directing the shutdown of plant operations when required;
- Ensuring that only trained workers use portable fire extinguishers;

- Ensuring that routes for emergency vehicles and paths for emergency responder access are clear;
- Informing arriving emergency responders of the incident location, conditions, and status of occupants; and
- Having knowledgeable workers available to advise emergency responders.

It may be beneficial to coordinate the action plan with other employers that share the worksite, although OSHA standards do not specifically require this.

Evacuation Wardens

In addition to a coordinator, designate and train workers as evacuation wardens to help move workers from danger to safe areas during an emergency (see 29 CFR 1910.38(e) and 1926.35(e)(1)). Generally, one warden for every 20 workers should be adequate, and the appropriate number of wardens should be available at all times during working hours. Workers (e.g. coordinators or wardens) designated to assist in emergency evacuation procedures should be trained in the complete workplace layout and various alternative escape routes. All workers should be made aware of workers with special needs who may require extra assistance; how to use the buddy system (i.e., procedure where two people, the "buddies", operate together as a single unit so that they are able to monitor and help each other); and hazardous areas to avoid during an emergency evacuation.

What type of training do workers need?

- Educate workers about the types of emergencies that may occur and train them in the proper course of action. The size of the workplace and workforce, processes used, materials handled, and the availability of on-site or outside resources will determine the specific training requirements.
- Ensure that all workers understand the function and elements of the emergency action plan, including types of potential emergencies, reporting procedures, alarm systems, evacuation plans, and shutdown procedures.
- Discuss any special hazards on site such as flammable materials, toxic chemicals, radioactive sources, or water-reactive substances.
- Clearly identify and communicate to workers specifically who will be in charge during an emergency to minimize confusion.

Topics for worker training:

- Individual roles and responsibilities;
- Threats, hazards, and protective actions;
- Notification, warning, and communications procedures;
- Means for contacting family members in an emergency;
- Any special tasks that workers may be called upon to perform during an emergency (if applicable);
- Evacuation, shelter, and accountability procedures;
- Location and use of common emergency equipment;

- Who is authorized to perform emergency shutdown procedures (if any);
- First-aid procedures;
- Protection against bloodborne pathogens (also see the Bloodborne Pathogens standard, <u>29</u> <u>CFR 1910.1030</u>);
- Respiratory protection (also see the Respiratory Protection standards, <u>29 CFR</u> <u>1910.134</u> and <u>29 CFR 1926.103</u>); and
- Methods for preventing unauthorized access to the site.

After reviewing the emergency action plan with workers and ensuring everyone has completed the proper training, it is a good idea to hold practice drills as often as necessary to keep workers prepared. It is also a good idea to include outside resources, such as fire and police departments, in the practice drills whenever possible. After each drill, employers should: gather management and workers together to evaluate the effectiveness of the drill; identify the strengths and weaknesses of the plan; and ways to improve the plan.

How often to train workers?

Review the plan with all workers and consider requiring annual training on the plan. Also conduct training after:

- Development of the initial plan;
- Hiring of new workers;
- Introduction of new equipment, materials, or processes into the workplace that affect evacuation routes;
- Reassignment of workers or changing their job duties;
- Change of layout or design of the facility; and
- Revision or updating of emergency procedures.

Publications: U.S. Department of Labor



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