

Emergency Action Plans

The Occupational Safety and Health Administration (OSHA) requires companies to develop emergency action plans when a specific OSHA standard requires their development using the guidelines found in 29 CFR 1926.35. Standards that include references to emergency action plans include 29 CFR 1926.64 relating to highly hazardous chemical storage, manufacturing, handling or movement of toxic, reactive, flammable or explosive chemicals and Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements under 29 CFR 1926.65—operations involving cleanup, emergency response and corrective actions involving hazardous wastes.

According to the standard, if a company employs fewer than 11 people, the program does not have to be in written form; however, many general contractors and building owners require a written emergency action plan, regardless of company size or applicability of OSHA standards.

This chapter outlines what is required by the OSHA standard, including the elements of an emergency action plan and training requirements. The end of this chapter contains a sample plan that can be used to help shape a company's individual plan.

Action Plan Elements

OSHA requires that the information listed below be included in an action plan. Some of the elements can be generic while others need to be site-specific. The italicized portions describe the issues a contractor needs to consider when developing the action plan.

- *Emergency evacuation plans, which include escape procedures and escape route assignments. This needs to be addressed on a project-by-project basis because there can be no generic plan for escape routes with the variety of roofing locations and layouts. For example, an emergency evacuation plan for a high-rise office building will differ greatly from one for a residential dwelling.*
- *Procedures to be followed by employees who remain to operate critical plant operations before evacuation. This procedure is intended to shut down critical operations that may make a situation even more hazardous. This may be a consideration for hot bitumen or similar applications because propane tanks are involved. There may be a need to shut down propane tanks at the cylinder before evacuating the site. Electrical tools can ignite a fire if a fuel, such as gasoline, is spilled. Again, this will need to be addressed on a project-by-project basis.*

- *Procedures to account for all employees after emergency evacuation has been completed. This is easy for a company to address in a generic plan. It only needs to state exactly how foremen or site supervisors will account for all employees. The location and manner of accounting for employees will vary by site and, therefore, need to be addressed for each job.*
- *Rescue and medical duties for those employees who are to perform them. If rescue and medical duties have been assigned, that information should be indicated in this section. If a company has decided to rely on paramedics or other outside medical services, that should be indicated, as well.*
- *The preferred means of reporting fires and other emergencies. OSHA is looking for the method, such as an air horn, that will be used to alert employees to evacuate. A human voice is an acceptable means for alerting employees if there are fewer than 11 employees present.*
- *Names or regular job titles of people or departments who can be contacted for further information or explanation of duties under the plan*

Alarm System

In 29 CFR 1926.35, another standard, 29 CFR 1926.159, is referenced, requiring employee alarm systems to comply with the following when there are 11 or more employees on site:

- *Any alarm system must be loud enough to be understood as an alarm above surrounding noise conditions.*
- *It must be distinctive enough to result in evacuation.*
- *If electronic or electrical equipment is used, it must be tested periodically for reliability.*

If a general contractor needs a subcontractor's company to fulfill the alarm obligations of emergency action plans, an air horn usually will suffice.

There is no section 29 CFR 1926.159 in the Code of Federal Regulations, but the alarm system requirements should comply with those set out in 29 CFR 1910.165. In an effort to eliminate duplicative standards, a Federal Register notice was published on June 30, 1993, indicating that 29 CFR 1926.156, 157, 158 and 159 were eliminated and the requirements of 29 CFR 1910.160, 162, 164 and 165 were to be followed. The requirements of 29 CFR 1910.160, 162, 164 and 165 are exactly the same as those from 29 CFR 1926.156, 157, 158 and 159. Although 29 CFR 1926 does not have the 29 CFR 1910 sections referenced, contractors still are obligated to follow the requirements of 29 CFR 1910. This is because of an error on OSHA's part;

the reference to 29 CFR 1910 was inadvertently left out of the 29 CFR 1926 standards.

Training

A company should present its emergency action plan to employees as soon as it is completed and, thereafter, when designated actions or employee responsibilities change or the plan changes.

Sample Emergency Action Plan

Although [company name] takes precautions to prevent them, emergencies do occur. When they do, they require quick, correct and decisive responses. Employees have been informed of the company's planned response to emergency situations, and they are expected to adhere to these guidelines for the duration of this project.

The elements of this plan, as required by 29 CFR 1926.35, are as follows:

- I. Emergency evacuation plan*
- II. Critical operations*
- III. Methods to account for [company name] employees*
- IV. Rescue and medical duties*
- V. Means of reporting emergencies*
- VI. Company representative(s) responsible for plan*

I. Emergency Evacuation Plan

On a typical roofing project, [company name] will prepare an emergency evacuation plan for two areas: the roof and ground.

Roof evacuation procedures are as follows: _____

Ground evacuation procedures are as follows: _____

II. Critical Operations

If any emergency occurs on a project involving propane, flammable or combustible liquids, combustion engine equipment or electrical tools, [company name] employees will shut off propane sources at the cylinders and turn off all equipment before evacuating, provided employee safety is not jeopardized by doing so.

Does this project involve the use of propane? Yes _____ No _____

Does this project involve flammable or combustible liquids? Yes _____ No _____

Does this project involve the use of combustion engine equipment? Yes _____ No _____

Does this project involve the use of electrical tools or other ignition sources? Yes _____ No _____

Does this project involve the use of other critical operations or materials not listed? Yes _____ No _____

Explain: _____

If our employees are not able to shut off propane supplies, the fire department or other responding emergency agency will be notified of the presence and locations of the propane tanks.

List locations of propane on this site: _____

III. Methods to Account for [Company Name's] Employees

Employees have been instructed to meet at a designated location so they can be accounted for on the project. If it is determined that any employees are missing, the responding emergency agency will be notified. The agency also will be informed about the last approximate whereabouts of missing employees.

The meeting location will be chosen based on the type of emergency involved. The project manager will account for wind direction and potential hazards in determining the meeting place.

The meeting location for this project will be: _____

IV. Rescue and Medical Duties

This crew has been specifically trained to rescue and/or attend to injured employees. Yes _____ No _____

If "No" has been checked, our employees will rely on paramedics or other emergency rescue teams.

If "Yes" has been checked, those employees trained in rescue operations will perform duties according to the training they have received. The remaining employees will meet at the designated meeting area.

V. Means of Reporting Emergencies

When a fire or emergency occurs, it is our intention to notify all employees, affected contractors, building owners and homeowners about the crisis.

The first call will be made to the local fire department by using 911. If 911 is unavailable in the job's area or there is an onsite fire department, such as on military installations, that emergency telephone number will be used instead. Emergency telephone numbers are included in this plan.

If there are 10 employees or fewer in the area, a human voice will be used to notify those on the job. For projects involving more than 10 employees, air horns or similar equipment will be used.

VI. Company Representative(s) Responsible for Plan

The job foreman is the responsible person to contact with any questions regarding this plan. If additional information is needed, the project manager should be contacted.

Emergency Contacts

Project Address:

Project Telephone: ()

Home Office Telephone: ()

Directions from Job Site to Nearest Hospital:

Use the space below to draw directions to the hospital. Be sure to include the north arrow.