

Preparation is crucial.

EMERGENCY ACTION PLAN DEVELOPMENT GUIDE



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Emergencies are impossible to predict

Having a good Emergency Action Plan (EAP) in place can help your facility prepare for fires, explosions, chemical spills, natural disasters and more. When people know their responsibilities, efforts aren't duplicated, valuable time is saved and your business can mount an organized response. Plus, planning for emergencies is more than just good company policy — it's the law.



Section 1910.38 of the Occupational Safety and Health Association's (OSHA) Code of Federal Regulations requires that all employers have an EAP. The OSHA Standard outlines the minimum requirements including emergency evacuation procedures, escape routes, means for accounting for all employees after evacuation, specified rescue and medical duties and training for all employees in the types of emergencies that may arise.

In addition to broader emergency planning, OSHA also requires businesses to plan for specifically for fires, including identification of potential fire exposures and detailing proper maintenance and housekeeping prevention measures.

Over the following pages you'll find guidelines for developing an effective EAP, which will provide a process to create a plan that can help you keep your operation safe, and respond properly if an emergency does occur.

GETTING STARTED

Following the steps outlined in this guide should help you develop an efficient and effective EAP. Remember to tailor your plan to your operation, and keep things as simple as possible. While it may take some time now, it will reduce valuable time during an emergency as well as help you comply with the regulations.

EAP TRAINING

The very best written plan is ineffective if it is not communicated to all employees. Training must be performed to comply with OSHA requirements. Training must take place when the plan is implemented, when changes in job assignment or responsibilities occur, when the action plan is revised, and upon initial hire of new employees. This training should be documented and become a permanent part of employee training records. If an OSHA inspection is performed at your facility, one of the questions an inspector will ask of employees is if they have been trained on the EAP. If the employees have not been trained on the action plan, fines or citations may be levied.

Training and documentation can be handled by your Safety Committee. OSHA sets no minimum time requirements for training, so the level of activity and responsibility required of the individual under the plan will determine the amount of time, but training should be simple and not too time consuming.

In addition to training of responsibilities of individuals under the EAP, supplement this training with the alarm requirements and fire prevention plan.

Your Emergency Action Plan should establish simple, easy-to-follow steps that can save crucial decision-making time during a crisis or emergency situation.





STEP 1 : Establish EAP policy

A policy should be developed for your organization outlining the purpose of and responsibility for the EAP. This policy should be the guiding force in the implementation and continuation of the EAP. This policy should be communicated to all employees from management.

The EAP Policy should cover:

- Who is responsible for updating the EAP
- Who is responsible for training requirements of the EAP
- Who training will be provided to and when

STEP 2 : Identify potential emergency situations and major workplace fire hazards.

Response to an emergency depends upon where it occurs and the type of emergency at hand. Make a list of any emergencies or worst-case scenarios that could occur at your operation.

Examples to consider:

- Tornadoes or other natural disasters
- Explosions
- Electrical fires
- Chemical spills
- Flooding or hurricanes
- Wild fires
- Loss of power
- Product contamination
- Human entrapment in grain or equipment
- Collapse of structures
- Severe falls
- Medical emergencies such as heart attacks or seizures
- Bomb threats

Next, decide what supplies, tools and responses you would need for each scenario.

One efficient way to do this is to list potential emergencies on one side of a piece of paper, and the response measures on the other side. As you complete this process, you'll find that the response side of your paper will begin to outline your response and prevention needs.

Pay special attention to fire emergencies. List all major fire hazards in your operations and develop a list of proper handling and storage procedures to help prevent them.

After going through this process, develop a pre-plan for each type of emergency situation.

STEP 3 : List emergency phone numbers

The following telephone numbers should be posted in your facility, in the manager/coordinator's home, and recorded in the documented plan:

- Fire department
- Ambulance/rescue
- Police department
- Air ambulance
- Hospital
- Electric power company
- Gas company
- Railroad agent (home and depot)
- All insurance company contacts
- Manager
- Assistant manager
- Emergency coordinator
- Chem-Trec
- Environmental Protection Agency
- Salvage company

You may wish to include other numbers, so include space in your EAP for updates to your list. Keep these numbers in a prominent location in your plan — preferably at the beginning.



STEP 4 : Develop personnel rosters and personal data sheets

Keep an up-to-date roster of all personnel and their next of kin. It is wise to have a personal data sheet on file as well as showing who should be contacted and where. Include key contact details for each person— whether that is employees, contractors, vendors or delivery people.

STEP 5 : Develop facility maps

In nearly every type of emergency having ready access to maps of your facility is vitally important. Copies of your maps should be made available to the local fire department and to your insurance company.

Prepare a flat or aerial map of the entire facility area. (The use of grid paper is helpful in drawing your map to scale.) Using grid paper to keep your maps to scale as much as possible, include these elements:

- All buildings
- Access roads
- Gate access and other openings in fences
- Railroads and rail intersections on property
- Power lines/power line cutoff locations
- Water hydrant connections or nearby bodies of water that could be used in a fire
- Any unique installations/equipment

For each building you have listed, indicate the type of construction. Label each building and include equipment and inventory contained in each. This is especially critical for buildings used to store chemicals, petroleum products and other hazardous or flammable materials.

Indicate on your maps the locations of all work areas and emergency escape routes. Indicate information that may be useful to fire fighters or other emergency responders.

For multi-level buildings such as feedmills and elevators, a cross sectional map is necessary to illustrate the multiple levels and work areas on each level. On these maps indicate height, access point and emergency escape routes at each level. Note any special features, which could be useful to firefighters and rescue personnel. When structural changes are made, maps must be updated.

STEP 6 : Designate evacuation routes and head count areas

The best way to designate evacuation routes is to show them on the maps developed in step five. Indicate escape routes on your maps with a highlighter and distribute them to employees as well as posting them in conspicuous areas in the workplace.

If you have to evacuate — whether it's for a fire, explosion, or other emergency — it is crucial to account for each person on your premises. Establish an assembly area or areas to account for the people you've identified in Step 2. This location should be some distance from your operations, and preferably along the route that fire or rescue personnel would use to access your operations.

When disaster strikes, everyone should understand that they are to quickly move to the appointed assembly area. Practice assembling with disaster drills to ensure everyone at your operation is prepared to make a quick evacuation. Appoint someone in charge of the head count area duties. They'll need a current personnel roster so they can account for every employee on the premises.

For visitors, it's a good idea to establish a sign-in policy on your premises. That way you'll know who is on your property and where they are so that everyone can be directed to the assembly area in the event of an emergency.



STEP 7 : Establish alternative communications systems

It's common to lose telephone service following a fire, explosion, hurricane, or other serious emergency, so your EAP should specify at least one alternative means of contacting help. Company vehicles can be equipped with two-way or CB radios.

Whatever system you decide on, make sure it's clearly identified in your EAP, and make sure someone is responsible for ensuring that the system is maintained and working properly by checking it regularly.

STEP 8 : Designate an Emergency Coordinator

The Emergency Coordinator (EC) is the facility's representative in charge at the emergency. In the event of an emergency requiring fire fighters, most states decree that the fire chief or officer-in-charge has control of the fire scene until he or she returns control to the facility owner or manager. If this happens, the EC must work with the fire chief or officer-in-charge.

The EC must be given adequate time and resources to serve in this responsibility before, during, and after an emergency. Many times the EC will be the individual responsible for the overall EAP.

The EC should coordinate the pre-planning activities with the local fire department or rescue personnel. Involving your fire department in the action plan is essential during, and especially before, an emergency. Facility tours help firefighters gain an understanding of what is being done and what types of facilities exist on your premises. Tours should be given annually and an updated copy of the action plan given to the fire department whenever the plan is revised.

Besides the EC, there are a number of employees who have assigned responsibilities and who can assist the EC and fire chief, so communication with the fire chief is critical during an emergency.

STEP 9 : Designate EAP responsibilities

Emergency situations are urgent. Employee's help will be needed to perform these activities. Pre-planning these activities will reduce the reaction time when an emergency occurs. Because of this, it is an OSHA requirement to specifically identify activities to be performed by employees who remain to operate critical plant operations in the EAP.

Additional emergency responsibilities should also be identified in this step of the EAP development, and could include:

Supply Officer

- Responsible for supplying manpower, materials, and equipment needed to control the situation
- Will include supplies located both on and off the premises
- Responsible for supplying materials for diking, fire fighting, etc.

Safety Officer

- Responsible for working with law enforcement and emergency personnel

Media Officer

- Sole contact who communicates with the media
- Keep media away from employee areas and a safe distance from the emergency

Communication Officer

- Responsible for facilitating communication among the employees and within the command center
- Works with the phone company to get lines back into working order
- Responsible for providing back-up communication systems

Other Duties

- Dealing with families to keep them informed following the emergency
- Working with salvage operations
- Working with regulatory agency inspectors



STEP 10 : Prepare for the Media

Major fires and explosions are media events and often attract large crowds of spectators, so you'll want to designate one person to be responsible for all interaction with media during an emergency.

Releasing information to the press can be delicate and requires advanced preparation. Make certain your employees know who their spokesperson is and that they make no statements to the media regarding accident cause, damage or injury.

The person in charge of news media should be instructed about the kinds of information acceptable for release. The following items are unacceptable:

- Cause of emergency – never speculate on it
- Blame – never discuss who or what may be responsible
- Dead or injured persons – never release names until next of kin have been notified
- Damage estimates – never estimate dollar amounts
- Extent of injury – never attempt to estimate the condition of injured persons

Release all factual information available. Comments should be kept general until all facts are known. A prepared list of facts will be most beneficial to your facility and to the media in a crisis. This may include names of management personnel, number of employees, principle business activity, description of facility and number of years in business. Your fact list should be periodically reviewed and updated. Determine the identity of persons asking questions and their telephone numbers, as later contact may be necessary. In releasing information be fair and equal to everyone covering the emergency. Don't expect to edit or review a reporter's story for accuracy. Requesting to do so is a good idea but not usually permitted.

Stay as calm as you can. Emotions escalate in emergencies and media representatives are usually working under deadline pressure. Always stress your facilities safety record and program of risk management.

STEP 11 : Prepare for regulatory investigations

Following a crisis, especially if someone has been injured or deaths are involved, you may be visited by OSHA, EPA, attorneys, or other regulatory agencies. Someone should accompany representatives from these outside organizations at all times during inspections on your site. All individuals must be required to sign in and out of the facility.



STEP 12 : Prepare for dealing with families of injured employees

Appoint a manager or key person to notify next of kin when an emergency involves injury or death. Such notification demands thoughtful care and tact, as the manner in which the family is told of injury or death can give them strength and ease their pain.

As soon as possible, determine the nature and extent of injury, and find out immediately where the victim is being taken. When it is known where the victim has been taken, dispatch the person handling notification to the victim's home. Once that person is en route call the victim's home to explain that there has been an accident and that someone is on the way and will be there soon. Maintain contact with the hospital.

Once the key person has arrived at the victim's home, they should call in for any new developments and verify that next of kin have been personally notified of the accident. Offer assistance like taking relatives to the hospital, finding someone to watch children or do whatever is warranted.

Special consideration should be given to notify the elderly. The shock of learning bad news is usually more difficult for this age group and may jeopardize their health.

STEP 13 : Preplan salvage operations

Following a disaster, cleanup efforts may involve working to identify and salvage undamaged inventory, so you'll want to establish a product inventory system and share the inventory with your insurance agent.

Your EAP should include a method for debris disposal. Be aware of what materials the landfill nearest your operation may accept, and find alternatives if needed.

Establish and follow specific procedures for disposing of chemicals and other hazardous materials in compliance with the Environmental Protection Agency (EPA), and other regulators. Plan your methods for cleanup and disposal.

The name of one or more salvage contractors should be on your list of emergency phone numbers.

Contact your Nationwide® agent to discuss putting your EAP in place.





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