

Employee Emergency Plans and Fire Prevention

Description:

The standard requires employers to prepare an emergency action plan/fire prevention plan (EAP) that contains certain mandatory elements. EAPs and fire protection plans shall cover the designated actions employers and employees must take to ensure employee safety from fire and other emergencies.

Regulatory Reference:

29 CFR § 1910.38 Employee emergency plans and fire prevention plans

Appendix to Subpart E to Part 1910-Means of Egress This appendix serves as a non-mandatory guideline to assist employers in complying with the appropriate requirements of Subpart E, 29 CFR § 1910.38.

Applies to:

All employers and employees are subject to the standard. The EAP must be a written plan, readily available to all employees if the employer has 11 or more employees. Employers with 10 or fewer employees must have a plan, but the plan does not have to be a written plan and it may be communicated orally to employees.

General Requirements:

The following elements must be included in the EAP:

1. Emergency escape procedures and emergency escape route assignments;
2. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate; **Note:** In many propane operations the EAP will limit this procedure to the activation of emergency shutdown devices that are on the evacuation escape route, if it is safe to approach the emergency activation device(s) without entering an LP-gas leak or becoming trapped within fenced or confined area.
3. Procedures to account for all employees after emergency evacuation has been completed;
4. Rescue and medical duties for those employees who are to perform them;
Note 1: Assigned medical duties are typically limited to administration of first aid, however, planning for administration of first aid should be coordinated with the company's compliance efforts regarding first aid and bloodborne pathogens.
Note 2: The EAPs of many LP-gas employers will limit the role of employees in emergency response and rescue, prohibiting most employees from remaining in or re-entering a hazardous atmosphere or hazardous area.
5. The preferred means of reporting fires and other emergencies; and
6. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

The employer is required to establish an employee alarm system that complies with 29 CFR §1910.165.

1. If the employee alarm system is used for alerting fire brigade members, or for other purposes, a distinctive signal for each purpose shall be used.

Note: Most LP-gas EAPs will specifically and clearly state that they do not have fire brigades, and that employees are to evacuate to a designated meeting place, and that only trained professional fire fighters are allowed access to the plant in the event of a fire, uncontrolled leak or other emergency.

2. *Evacuation.* The employer shall establish in the emergency action plan the types of evacuation to be used in emergency circumstances.

The following elements must be included in the fire prevention plan:

1. A list of the major workplace fire hazards and their proper handling and storage procedures, potential ignition sources (such as welding, smoking and others) and their control procedures, and the type of fire protection equipment or systems that can control a fire involving them;
2. Names or regular job titles of those personnel responsible for maintenance of equipment and systems installed to prevent or control ignition or fires; and
3. Names or regular job titles of those personnel responsible for control of fuel source hazards.
4. *Housekeeping.* The employer shall control accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire emergency. The housekeeping procedures shall be included in the written fire prevention plan.

Training Requirements:

Before implementing the EAP, the employer shall designate and train a sufficient number of persons to assist in the safe and orderly emergency evacuation of employees.

The employer shall review the plan with each employee covered by the plan at the following times:

1. Initially when the EAP is developed,
2. Whenever the employee's responsibilities or designated action under the plan change, and
3. Whenever the plan is changed.

The employer shall review with each [new] employee upon initial assignment [or existing employees when there is a change in assignment] those parts of the plan which the employee must know to protect the employee in the event of an emergency. The written plan shall be kept at the workplace and made available for employee review. For those employers with 10 or fewer employees the plan may be communicated orally to employees, and the employer need not maintain a written EAP.

When implementing the fire prevention plan the employer shall apprise employees of the fire hazards of the materials and processes to which they are exposed. The employer shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.

The written fire prevention plan shall be kept in the workplace and made available for employee review. For those employers with 10 or fewer employees, the fire prevention plan may be communicated orally to employees and the employer need not maintain a written plan.

Although documentation of training is not required by the OSHA standard, all training related to the EAP and fire prevention plan should be documented including the training program used, the names of the persons trained, and the date of the training.

Maintenance and Review

Responsible managers and supervisors should review the EAP and fire protection plan on a scheduled periodic basis. Any change in plant or building layout, emergency systems, equipment or personnel responsibilities may prompt changes in the plans.

Training should be scheduled periodically for all employees, for new employees as part of their orientation, and immediately after any significant change in the plans.

Regarding the fire prevention plan, the standard specifically requires:

Maintenance: The employer shall regularly and properly maintain, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials. The maintenance procedures shall be included in the written fire prevention plan.

Additional Information and Resources

CETP Book One, *Basic Principles and Practices*, Certified Employee Training Program, National Propane Gas Association, Lisle, IL

Propane Emergencies, Propane Education & Research Council, Washington, DC
www.propanesafety.com

Appendix to Subpart E to Part 1910-Means of Egress This appendix serves as a non-mandatory guideline to assist employers in complying with the appropriate requirements of Subpart E, §1910.38, Employee emergency plans, 29 CFR 1910 following §1910.38

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