

OSHA STANDARDS

Emergency Preparedness

sensible and it's the law

By Christopher Scott D'Angelo

OSHA sums up emergency preparedness as follows: 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 an emergency is necessary to respond effectively.

As OSHA directs, 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. Of course, even the best plan is of no value if merely put on a shelf—planning, training, and practice in advance of an event help ensure that everyone knows what to do when an emergency occurs and provide the best shot at avoiding or reducing the risks of serious injury or damage.

OSHA's *Principal Emergency Response and Preparedness Requirements in OSHA Standards and Guidance for Safety and Health Problems* is a valuable resource as it provides a broad overview of emergency planning requirements in OSHA standards.

Workplace emergency. OSHA defines a workplace emergency as “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 how many other hazards.” OSHA's *Emergency Preparedness and Response* lists specific hazards, as well as links to general emergency preparedness and response guidance.

OSHA requirements for emergencies.

Some key OSHA requirements for emergencies relevant to the construction industry can be found in the following regulations for general industry (29 CFR 1910) and construction (29 CFR 1926). Contractors working in or related to the maritime world need also follow additional sections (29 CFR 1915, 1917, and 1918). OSHA provides a helpful table of such standards (see Resources), though OSHA is quick to add that the table is not all-inclusive. Other OSHA regulations apply, and there are a number of other federal, state and local agencies that have jurisdiction, such as EPA, NIOSH and specific state equivalents.

For example, the regulations cover not only emergency action plans themselves, but also such topics as access/egress for medical services and first aid, fire prevention plans, safety management of

highly hazardous chemicals, hazardous waste operations, personal protective equipment (particularly respiratory, eye, head or feet/hands protections) and electrical protective devices. Environmental conditions and controls are also a focus.

Employee emergency action plans.

OSHA requires employers to prepare and implement a written **emergency action plan** for all sites where more than 10 personnel are present; and a written plan is highly advisable for smaller sites. The plan should include, for example, emergency escape procedures and route assignment; procedures for those remaining to conduct critical operations; procedures to account for employees after the emergency, rescue and medical duties of those assigned; and means of reporting fires and emergencies. Training of all personnel covered is also crucial. While details or examples of such plans are beyond the scope or space of this article, important and helpful references are provided below.

When working on or alongside an existing facility, such as with renovations or additions, it is crucial to coordinate the contractor's emergency action plans with those of the existing facility operator.

Medical services and first aid.

OSHA has procedural, program and equipment requirements; training

requirements; and requirements for certain assistance tools. As a threshold matter, OSHA requires contractors to make arrangements **before a project begins** to ensure that medical personnel are available for consultation on occupational health matters, to provide easily accessible first aid supplies, to provide suitable facilities for immediate emergency use for quick drenching and flushing of eyes and body if exposure to corrosive materials is possible, and to provide for proper transport of an injured person to medical facilities. It is the contractor's obligation to know what materials are being used and which ones are corrosive or otherwise require special handling; **this too often is taken too lightly or assumptions are made that can come back to bite someone (or worse)**. In the absence of readily accessible medical services, a person with a valid certificate in first aid training must be available at the worksite to render first aid.

Fire protection and prevention.

OSHA requires the development of a fire prevention and protection program and the conspicuous availability of fire suppression equipment. The fire extinguishers and suppression systems must take into account the site conditions and the types of equipment, materials and chemicals onsite. Certain projects will require the presence of firefighting personnel. Proper alarms and emergency communications systems must be employed, and materials and potential ignition sources must be handled and stored in locations to not create a fire hazard or impede access or egress.

Means of egress.

OSHA requires that construction worksites maintain unobstructed egress from every building, structure or site where personnel are working. All exits and access to exits must be marked with signs. Markings must be effective under emergency conditions (e.g., smoke, darkness, etc.).

Chemicals and other hazardous materials.

OSHA also has very strict requirements regarding the use, handling, storage and disposal of chemicals and other hazardous materials. Regulations of other agencies, such as EPA, are also applicable and must be followed as well.

Insurance Company Assistance.

Another resource may be found with the contractor's insurance company. A number of insurers or brokers offer assistance in creating the plan or conducting the training. Sometimes this is available without additional charge,

but in many instances, it can help in underwriting to lower premiums.

CLOSING THOUGHT

Being prepared for the expected and expected in the construction industry is possible with the tools and guidance of OSHA and experienced GCs and other on-the-job managers. ■



For a list of resources, go online to mcsmag.com and check out this article.

about the author

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