

EMERGENCY ACTION PLANS

APWU
Industrial Relations
Safety & Health

June 2004

Protecting Postal Workers before an Emergency

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Executive Vice President - Cliff Guffey
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Although it is management's obligation to provide a safe and healthful workplace, it is extremely important for postal workers to be aware of their own responsibilities. Emergency Action Plans set the groundwork not only for assuring that all postal workers know what management's responsibilities are, but what they themselves should do during an emergency.

I encourage all Locals to address Emergency Action Plans through their Joint Labor-Management Safety & Health Committees. Be sure that the plans are comprehensive and up to date, and that every employee in a facility is properly trained. Your safety in an emergency situation depends upon *everyone* knowing what to do.



In the event of an emergency, all employees must know their responsibilities and what to do to protect themselves and their co-workers. Emergency Action Plan documents, as required by OSHA, spell out what actions should be taken, define who is responsible, and require that everyone undergo emergency training. It is important for Locals to ensure that the information in a facility's Emergency Action Plan is current and covers all reasonably anticipated emergencies.

I want to credit Greg Bell's Industrial Relations Department, and Corey Thompson, Safety & Health Specialist, for developing this guidance document to help local safety and health committees prepare Emergency Action Plans.



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May 18, 2004

Dear State & Local Presidents:

The attached document is provided to assist your local in enforcing the requirement of both the Postal Services and OSHA with regards to Emergency Action Plans. This document provides an outline of the regulator requirement and guidelines on the content of a quality Emergency Action Plan.

It is the responsibility of the Local Safety & Health Committee to insure that Emergency Action Plans are prepared, that training is provided and that plans are comprehensive in content. If a local facility is not in compliance and does not make an effort to become compliant, in a reasonable length of time, appropriate actions should be taken including filing a formal OSHA complaint and grievances.

The safety of Postal workers depends upon a good Emergency Action Plan.

Yours in union solidarity,


Cliff Guffey
Executive Vice President


Corey Thompson
National, Safety & Health Specialist

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Attachment

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Introduction

Emergency Action Plans – They will save your life!

Emergency, by the very definition of the word is an unexpected event. Nobody expects to have an emergency or disaster but they can and do strike anyone, anytime and anywhere. Emergencies create a situation where employees may be required to evacuate facility with little notice or take other action necessary to protect them. The time to plan for an emergency is before it occurs. To protect employees OSHA requires that employers develop a plan of action (emergency action plan) for when emergencies could occur.

Emergency action plan must include planning for both non-life threatening (lack of water, electrical failure, etc.) and life threatening (tornados, biological or chemical spills, etc.). The plans must be in writing, be available to employees, be taught to employees, drilled, and reviewed and updated by the local joint labor management safety and health committee.

Emergency action plans are specific to every facility therefore a “one size fits all” template is difficult to prepare. The following pages and attachments provide an outline of what should be in every Emergency Action Plan. Remember, you need to make the plan fit local condition.

The Plan

Emergency Action Plans (EAP's), sometimes known as employee evacuation plans, fire plans etc., must comprise a detailed written description of the actions to be taken in the event of an emergency. Further, application of the EAP must be negotiated into the LMOU as required by Article 30.B.3.

The Postal Service is required under OSHA standards to develop and maintain a written Emergency Action Plan for every facility. OSHA Standard 29 CFR 1910.38 (attached) provides the basic requirements for an Emergency Action Plan. Other OSHA Standards also include requirement for action plan in the event of an emergency; examples include the Bloodborne Pathogen Standard (29 CFR 1910.1030, Fire Prevention Standard (29 CFR 1910.151), the Hazardous Materials standard (29 CFR 1910.120) and others. A facility's Joint Labor Management Safety and Health Committee may determine that similar actions occur in different emergencies and combine plans into one comprehensive EAP.

The following is a list of some of the emergencies that must be planned for (this list is not all inclusive)

- Floods

- Hurricanes
- Tornadoes
- Fires (both in a facility and outside (forest fires))
- Chemical or Biological weapon attacks
- Toxic gas releases
- Chemical spills
- Radiological accidents
- Explosions (bombs)
- Civil disturbances
- Workplace violence
- Bio-detection System Alarms
- Other Weather related conditions (snow, ice)
- Road closures
- Suspicious materials incident
- Medical Crisis
- Industrial Accident
- Water line breaks, loss of water pressure

Key Elements

Each plan must contain sufficient information to insure the safety of employees. The written procedures must be detailed and communicated to every employee. A record should be maintained demonstrating that an employee(s) has received training on each Emergency Action Plan and that the employee understands the Emergency Action Plan as well as their role in making the Emergency Action Plan work successfully. At a minimum plans must include:

1. Emergency escape procedures and escape route assignments.
2. Shelter in place procedures
3. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
4. Procedures to account for all employees after emergency evacuation has been completed.
5. Rescue and medical duties for those employees who are to perform them.
6. The preferred means of reporting fires and other emergencies.
7. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.
8. When and by what criteria an EAP is implemented.

Every plan must also include:

1. An “alarm system” – a method of notifying all employees of an emergency. Special considerations must be given to ensure that deaf and hard of hearing employees are properly notified.
2. Training – must be provided before implementing the plan.
3. The employer must designate and train a sufficient number of persons to assist in the safe and orderly evacuation.
4. All employees shall receive training on the plan when the plan is developed, whenever the employees responsibilities or designated actions under the plan change, and whenever the plan changes

The Postal service has developed a number of documents that direct managers to develop Emergency Action Plans including:

- EL-850-2001-2 Emergency Evacuation and Fire Protection,
- EL-810-96-1 Response to Hazardous Materials Releases,
- MS-56 Fire Prevention and Control,
- EL-812 Hazardous Materials and Spill Response.
- Interim Guidelines for Sampling, Analysis and Decontamination of B. Anthracis spores in US Postal Service facilities – 2003
- 29 CFR 1910.Subpart E – Exit Routes, Emergency Action Plans, and Fire Prevention

Although these documents provide guidance on procedures they do not substitute for formal, written Emergency Action Plans. Additional information on developing and evaluating Emergency Action Plans may be found on OSHA’s Web page www.osha.gov .

Summary

A written emergency action plan is the initial document that outlines the specific task and responsibilities of everyone in a facility during an emergency situation. Plans must be facility specific and to be effective all employees must be trained on the plan, routinely receive updated information and participate in drills. Every employee must have access to the plan, should read and understand your facilities plan, know your responsibilities in the event of an emergency, and be prepared to be safe.

Emergency Action Plans will save lives, if an employer has not or will not developed and train all employees on a comprehensive EAP OSHA will enforce their standard. A formal request to OSHA asking that they conduct an on-site inspection can be filed by any employee. The attachment “How to file an OSHA Complaint” is included in this document to assist you with this process.

Preparing an Emergency Action Plan prior to a crisis

The following pages provide, in outline form, items to be considered when reviewing or preparing emergency action plans.

- ***A written document (plan) that defines:***
 - Actions
 - Responsibilities

of individuals in times of crisis or disaster.

What should a plan contain?

- Names and/or titles
- Responsibilities
- Duties
- Criteria
- Accountability
- Dates (prepared and updated)

What should the plan cover?

- ***ALL EMERGENCIES***
 - Hurricanes
 - Tornadoes
 - Fires (both in a facility and outside (forest fires)
 - Chemical or Biological weapon attacks.
 - Toxic gas releases
 - Chemical spills
 - Radiological accidents
 - Explosions (bombs)
 - Civil disturbances
 - Workplace violence
 - Bio-detection System Alarms
 - Other Weather related conditions (snow, ice)
 - Road closures
 - Suspicious materials incident
 - Medical Crisis

- Industrial Accident
- Water line breaks, loss of water pressure

Overall Plans components

- Emergency Action Plans
- Fire Prevention Plan
- Bloodborne Exposure Control Plans
- Hazardous Materials Release Plans
- Hazard Communication Plans
- Confined Space Plans

OSHA Requirements of the plans

Emergency Action Plans

- **OSHA 1910.38 – Employee emergency plans and fire prevention plans**
 - In writing
 - Covers designated actions employer and employees must take to insure safety from fire and other emergencies.
 - Minimum required elements
 - Emergency escape procedures and routes
 - Procedures for employees who stay behind
 - Procedures to account for all employees
 - Rescue and medical duties of designated employees
 - Preferred means of reporting a fire
 - Names or title of persons responsible additional information on the plan
 - Evacuation
 - *Types of evacuation to be used*
 - Training
 - *Before implementation – train designated person to assist in emergencies*
 - *Review the plan with all employees*
 - » Initially
 - » Whenever changed
 - » When employee responsibilities change
- **OSHA 1910.38 (b) – Fire Prevention Plan**
 - **In writing**
 - **Minimum requirements**
 - List of workplace fire hazards
 - Potential ignition sources
 - Types of fire protection equipment
 - Name or title of person responsible for equipment and system maintenance
 - Name or title of person responsible for control of fuel source hazards
 - Housekeeping – control of sources

- Training
 - All employees
 - » Initial assignment
- Plan must be kept in the workplace and made available for review

- ***Postal Documents***

- MS-56 Fire Prevention and Control
 - Emergency Planning
 - Fire Prevention
 - Training
 - Employee Alarms
 - Fire Brigades and Means of Egress
 - Flammable and Combustible materials storage
 - Portable Fire Extinguishers
 - Hot Work Fire Protection
 - Alarms and Detection Systems

- ELM – Section 850
- EL-850-2001-2 Emergency Evacuation and Fire Prevention
- Form 1784 – Safety and Health Inspection Checklist
- AS 510-83-3 Building and Site Design Safety Requirements
- Notice 71 Bombs by Mail
- Handbook EL-812 – Hazardous Materials and Spill Response
- Handbook EL-814 – Employee’s Guide to Safety
- EL-810-96-1 Response to Hazardous Materials Spills
- EL-810-2000-2 Bloodborne Disease Exposure Control Plans
- EL-810-96-2 Hazard Communication Programs

Developing a Plan

- Typically, it is not until after emergencies occur that we realize the importance of planning. But the time to plan and prepare is before an emergency occurs. An emergency is any unplanned, unexpected event that threatens life, property or the environment. In general, there are two types of emergencies that can occur in a workplace:
 - Natural Emergencies
 - Emergencies caused by the actions of others

Emergency Planning

- *Who should be involved in developing and Emergency action plan?*
 - Joint Labor Management Safety and Health Committees
 - Local Fire and rescue
 - Local Medical Officials or Public Health

What are the first steps?

- *Identify the hazards*
 - Surveys and Inspections of the workplace - records review
 - Review of the facilities chemical inventory
- *Develop an outline of the hazards*
- *Get additional information on the hazards*
 - Local public health
 - FEMA – Weather Service
- *Review available resources*
 - First Aid/CPR supplies
 - Firefighting equipment
 - Shelters
 - Security
 - Trained Personnel
 - External Resources
 - Physical Structure (exits, alarms, hazards)

Second Step

- *Review the information collected*
 - Identify the Hazards
 - Identify weakness and strength
 - Identify training needs
 - Identify equipment needs
 - Identify administrative policy strength and weakness
 - Identify housekeeping changes

Written plan components

- Identified potential emergencies
- Notification and alarms
- Reporting of emergencies
- Emergency escape routes
- Procedures to assist disabled workers and visitors

- Procedures to account for all employees
- Procedures for those who remain behind an Emergency Responses
- Names/titles of key personnel
- Rescue and medical procedures
- Special procedures

Training

- ***All employees should be trained***
 - Overview of the plan, what, when and how
 - Evacuation procedures and routes of exit
 - Practice drills
- ***Designated employees should be trained***
 - Details of the plan
 - First Aid/CPR
 - Hazardous Materials First Responder
 - Biological/Chemical response
 - Evacuation procedures – operations shutdown
 - Firefighting

What's Next

- Drills – Conduct drills, identify problems and get people comfortable with what to do.
- Additional and routine training
- Critique drills
- Update and modify plan as necessary – then retrain on the updates

Internet Resources

- APWU Safety & Health – www.apwu.org
- FEMA – www.fema.gov
- OSHA – www.osha.gov
- BOMA – www.boma.org/emergency/
- NSC – www.crossroads.nsc.org/emerg_manag.cfm

The following is a list of postal document that should be reviewed while preparing and reviewing an Emergency Action Plan. These documents should be available from management and are include on the *Postal Safety Tool-kit*.

<u>EL-810-96-1</u>	Response to Hazardous Materials Releases
<u>SOP-S27</u>	Plan for Weekly Fire Alarm Test
<u>EL-850-2001-2</u>	Emergency Evacuation and Fire Protection - Replaces AS-510-98-3.
PS FORM 7531	Case Activity Report - External Crimes
<u>PUB 275</u>	Post Office Robbery
PUB 159-B	Contingency Planning — Civil Disorders and Natural Disasters This document is a restricted document.
PUB 159-C	Contingency Planning For Bombs and Bomb Threats This document is a restricted document.
AS-510-98-3	Emergency Evacuation and Fire Protection - Obsolete replaced by <u>EL-850-2001-2</u>
PS FORM 2162	Burglary and Robbery Countermeasures Program
PS FORM 7498-D	Facilities Environmental Checklist
<u>EL-860-1999-3</u>	Emergency Response to Mail Allegedly Containing Anthrax
<u>MS-56</u>	Fire Prevention and Control
<u>EL-810-90-6</u>	Hazardous Materials Spill or Leak Standard Operating Procedures
<u>EL-812</u>	Hazardous Materials and Spill Response
<u>EL-540-91-1</u>	Job-Related First Aid Injuries
PS FORM 7532	Robbery Report
PUB 176	Carrier Robbery/Assault
PUB 54	Notice of Bomb Threat
<u>RE-5</u>	Building and Site Security Requirements
<u>SOP-S06</u>	Hazardous Spill Leaks & Emergency Plan
<u>SOP-S08</u>	Hot Work Permits
<u>SOP-S11</u>	Suspect Parcel & Bomb Threat
<u>POSTER 26</u>	Letter and Package Bomb Indicators

Key reference documents are provided as attachments.

Attachments

1. Donahoe-Medvidovich letter October 10, 2001 – Emergency Action Plans
2. EL-850-2001-2 – Emergency Evacuation and Fire Prevention
3. ELM section 850 – Emergency Action Plans and Fire Prevention and Control
4. Guidance for Postal Service HAZMAT First Responders
5. OSHA Regulations 29 CFR 1910 – Subpart E – 1910.33-39 and 1910 Subpart E Appendix
6. OSHA – How to file a Complaint with OSHA
7. Potter-Burrus Memo February 2000 – Joint Labor-Management Safety and Health Committees (APWU)
8. MOU – Correction of Unsafe Conditions



October 10, 2001

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, CAPITAL METRO OPERATIONS

SUBJECT: Emergency Action Plans

Recent world events have emphasized the need for postal facilities to be prepared to respond to emergencies. The ELM, in Section 850, requires all postal facilities with more than ten employees to have written Emergency Action Plans. For facilities with ten or fewer employees, the plan may be communicated verbally. The plans must include actions that management and employees are expected to take in the event of various foreseeable types of emergencies. These plans must be kept up to date and communicated to employees at least annually. Training is required for Emergency Evacuation Teams (EET) and Spill Response Team members. At least one emergency evacuation drill must be held annually, and other types of drills, e.g., spill response, should be held as necessary to maintain proficiency of spill response team members. Training for EET members and Spill Response Team members (HAZWOPER) is available through the National Center Employee Department.

Emergencies that affect the entire community require coordination with local emergency program managers. These emergencies may include severe weather, flooding, and terrorist activities. Local and state authorities have established emergency operation plans. Additionally, the federal government has emergency response plans. The federal plan was activated September 11 in New York City. The Federal Emergency Management Agency currently has the lead in civil defense matters, which includes response (search and rescue) and recovery initiatives. The FBI is the lead agency in terrorism incidents. Other federal agencies offer support as needed. However, all response efforts begin locally, so it is critical to establish coordination and communication with local emergency personnel.

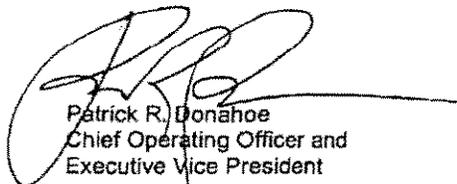
Aviation Mail Security is currently providing operational HAZMAT training for employees at AMCs, AMFs, mail processing centers, international service centers, and retail acceptance points. These training modules outline HAZMAT awareness, acceptance, proper handling, and transporting procedures.

References useful in preparing and maintaining the Emergency Action Plans are:

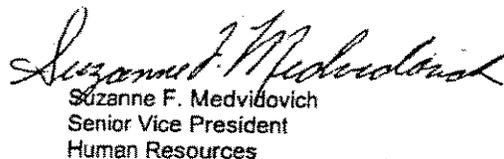
- ELM, Section 850
- MI EL-810-96-1, Response to Hazardous Materials Releases
- MI EL-860-1999-3, Emergency Response to Mail Allegedly Containing Anthrax
- MI EL-810-2000-2, Bloodborne Disease Exposure Control Plans
- MI EL-810-2001-1, Personal Protective Equipment and Respiratory Protection Programs
- MI EL-850-2001-2, Emergency Evacuation and Fire Prevention Safety Toolkit Resources Page

A sample safety talk titled Hazardous Material Spill and Leak Response, from the Safety Toolkit, is attached. Additional safety talks on the above topics are available in the Toolkit.

Please ensure that facilities within your respective span of management have developed and implemented Emergency Action Plans and that personnel training has been performed and documented. Stand-up talks covering the Emergency Action Plans should be presented. Questions concerning the Emergency Action Plans should be directed to Denise Richardson at 202/268-3686.



Patrick R. Donahoe
Chief Operating Officer and
Executive Vice President



Suzanne F. Medvidovich
Senior Vice President
Human Resources

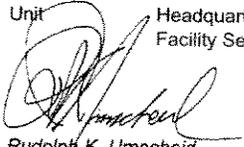
Attachment

Management Instruction

Emergency Evacuation and Fire Prevention

This instruction provides the Emergency Action Plan and Fire Prevention Plan required by *Employee and Labor Relations Manual (ELM) 850*. It outlines procedures for use by evacuees — employees, contractors, and other tenants — in case of an emergency at Postal Service Headquarters, 475 L'Enfant Plaza, Washington, D.C., and by Postal Service employees implementing the two plans.

Date	June 27, 2001
Effective	Immediately
Number	EL-850-2001-2
Obsoletes	MI AS510983
Unit	Headquarters Facility Services


Rudolph K. Umscheid
 Vice President
 Facilities

Emergency Action Plan

Procedures to Use in an Emergency Evacuation

In an emergency or when an emergency evacuation drill occurs, *all* Postal Service employees, contractors, and other tenants must evacuate the building in a rapid but orderly manner. Emergencies that may require evacuation include fire, smoke, release of hazardous chemicals, earthquake, or bomb threat. Emergency evacuation team (EET) members have been pre-selected and trained to help in carrying out a safe evacuation. Specific EET duties are outlined on page 4.

Remember: In case of evacuation, fire, or medical emergencies, call extension 4566.

Preparing for an Emergency

Before an emergency occurs...

- _1 Locate the fire alarm box nearest your work space and read the instructions on the box.

You can find alarm boxes in elevator lobbies on each floor, in the center corridors, at the extreme north and south ends of the building, and in other locations.

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Pulling the boxes activates an interior local signal in an emergency evacuation alarm system that notifies the Postal Police Command Center — *not the Metropolitan Fire Department*. The Postal Police Command Center (a) identifies the box pulled (or the location of another initiating device such as a smoke detector), (b) dispatches a postal police officer (PPO) at once to that location, and if necessary (c) the PPO will notify the Metropolitan Fire Department.

- _2 Locate the fire extinguishers.

The ABC type, multi-use fire extinguishers (portable) can be found throughout the building and garage levels.

Caution: Do not use water on electrical, flammable liquid, or chemical fires.

- _3 Understand the emergency alarm system.

The emergency alarm signal for evacuation is an alert tone with strobe lights flashing, followed by an audible announcement of instructions to evacuate a particular zone or to evacuate the entire building.

Notice: Do not evacuate if the alert tone with strobes flashing activates for a short period of time (less than one minute without voice instructions) and is silenced. When the alert tone next sounds with the strobes flashing and is followed by an audible voice announcement, you must then immediately evacuate the building.

- _4 Locate the emergency evacuation routes in your area.

Stairwells located on each side of the elevator lobbies are to be used as evacuation exits.

Notice: Evacuees must not use elevators unless they are persons with disabilities (see *If you are a person with a disability...*).

- _5 Locate the EET member rosters posted in each elevator lobby on all floors and find the members assigned to your area. If you have a temporary or permanent disability, introduce yourself to appropriate EET team members.

- _6 Be aware that a temporary first-aid station away from danger may be set up if necessary.

The Postal Police Command Center (room 1320) in the south lobby will likely serve as a first-aid station. But if that location is unavailable, the PPOs will set up a station elsewhere on the first floor or outside the building.

If you are a person with a disability, permanent or temporary...

- _1 Be aware of special evacuation instructions that apply to persons with a permanent or temporary disability.

A pre-selected, trained aide from the EET team will help you.

A freight elevator is the preferred method for evacuation of persons with disabilities. If this elevator is unavailable, you will be helped to enter the west, double-door stairwell and descend these stairs from any floor.

Special evacuation sleds are available. EET members will access the sleds or other equipment to aid your safe exit.

- _2 Introduce yourself to the floor warden, aides to the disabled, and their alternates assigned to aid you. This is important even if your disability may be temporary (broken bones), or not obvious (recent surgery, cardiac or respiratory illness).

If you are entrusted with protecting valuable materials...

- ___ Make sure adequate security measures are maintained for safeguarding valuable materials, papers, money, and stamps during an emergency evacuation.

Reporting an Emergency

If you need to report an emergency that may require an evacuation...

- _1 Pull down the cover of the nearest fire alarm box. The Postal Police will be notified and will dispatch an officer to your location.
- _2 If safe to do so, stay near the fire alarm box until PPOs (or firefighters) arrive, in order to direct them to the exact location of the fire or other emergency.

Caution: Do not stay at the fire alarm box if your personal safety is endangered.

If you think you can extinguish a first-stage fire...

- ___ If a fire has just started and is well controlled, you may want to try to put it out with a fire extinguisher. Do not delay sounding the alarm to report the emergency in order for the situation to be evaluated for possible evacuation of the building.

Caution: Do not try to fight any fires that are beyond the first stage or that involve the structure of the building. Under no circumstances use personal protective gear or self-breathing apparatus. Leave fire fighting to the professionals.

Evacuating the Building

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation occurs...

- _1 Secure your own personal work space and valuables as required and proceed in a rapid but orderly manner to the designated stairwell to exit through the lobby doors and a safe distance from the building.

Caution: Do not try to use the elevators unless you are a person with a disability. Elevators will not respond to hall call buttons when the evacuation alarm sounds. Only disabled persons and aides to the disabled are to exit the building using the freight elevator (see: If you are a person with a disability...).

- _2 As you exit along evacuation routes, follow instructions given by floor wardens, other EET members, and PPOs coordinating the evacuation.

Caution: If smoke or fire blocks any designated exits, floor wardens and stairway monitors will direct you to alternate exits.

- _3 Be careful of traffic when crossing the street and do not impede the path of fire personnel and vehicles.

If you are a person with a disability, permanent or temporary...

- _1 You and/or the aide to the disabled call the Postal Police Command Center at extension 4566, give your location, and request a "disabled pickup." You and the aide to the disabled (or other EET member) proceed to the nearest freight elevator (elevators #1 and #14), descend to the first floor, and exit through the lobby doors and away from the building.
- _2 If no freight elevator arrives, make sure an aide helps you to the west, double-door stairwell. The aide will advise the EET leader or floor warden of your location and will solicit more help if needed.
- _3 If the EET leader determines that a sled evacuation is needed, follow the instructions of those conducting the evacuation to ensure a safe exit down the west stairs.

Emergency Evacuation Team

Composition of the Team

The core of the Emergency Evacuation Plan is the emergency evacuation team.

Headquarters Facility Services appoints an EET leader to implement the Emergency Action Plan.

The EET leader — with unit managers, appoints EET members (floor wardens, stairway monitors, elevator monitors, aides to the disabled, and their alternates) for each floor, and coordinates training for the EET members to carry out a safe emergency evacuation.

General Duties

- _1 Be familiar with all parts of the Fire Prevention Plan and the Emergency Action Plan (as outlined in this MI), the alarm system, and communications systems.

- _2 Insure that anyone serving as an alternate fully understands your responsibilities and can substitute for you without notice. In an emergency, that alternate should go at once to your sector to cover your duties if you are absent. Alternates are encouraged to read the instructions for other EET members to ensure coordination and mutual understanding. Place your hat and instructions at your workstation where they are easily retrievable.
- _3 Take part in all scheduled EET meetings.
- _4 Follow the floor warden's instructions as necessary.
- _5 Ensure adequate coverage of floor warden and other EET assignments when the floor warden is not available.
- _6 Upon the first alarm activation of the emergency alarm system, an alert tone and strobe light warn of a possible emergency situation. Go at once to your assigned sectors and assume assigned duties.
- _7 If an emergency exists (*alert tone, strobes flashing followed by an audible voice announcement giving instructions to vacate the building*), evacuate occupants in a manner that is as rapid, safe, and orderly as possible. Bar entry to danger zones and direct occupants to alternate safe exits if necessary.
- _8 Aid the PPOs and/or Metropolitan Fire Department officials as requested.

Specific Duties

Emergency Evacuation Team Leader

Appointed by the Headquarters Facility Services, the EET leader makes sure that managers fill team vacancies, coordinates EET training, and implements the Emergency Action Plan.

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation, occurs...

- ___ Assume command of the evacuation operation until the Metropolitan Fire Department or other responding unit arrives.

Floor Wardens

The EET leader assigns a floor warden for each end (north and south) of each floor.

During an evacuation, floor wardens (a) ensure assignment of aides to persons with disabilities and (b) coordinate efforts of other EET members.

Floor wardens notify the EET leader in writing of any new team members to update the emergency evacuation rosters.

Before an emergency occurs...

- _1 Know your EET members and their alternates. Contact each EET member and make sure each person is equipped with a hat and set of emergency evacuation duties and instructions.
- _2 Review and be able to explain to all EET members their duties and instructions.
- _3 Know the names and locations of persons in your sector who have a temporary or permanent disability. Assign an aide and/or an alternate to each disabled person. Be prepared to assign more people to specific tasks as needed.

Upon the first alarm activation of the emergency alarm system, an alert tone and strobe light will warn of a possible emergency situation...

- ___ Insure that the aides to the disabled go to the workstation of the disabled person and stand by to call the Postal Police at 4566 to request an elevator to pick up the disabled. If the second alarm with voice announcement does not sound, the aides and the disabled can return to their work assignments.

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation, occurs...

- _1 Close all interior and exterior doors and make sure that doors remain closed except when opened to aid a fire-fighting or damage-control effort.
- _2 If necessary, go to the Postal Police Command Center to advise the Postal Police or EET leader of conditions and circumstances that need greater aid.
- _3 Tour your sector to make sure that *all* persons (including those with a temporary or permanent disability) have evacuated.
- _4 Report "all clear" to the Postal Police Command Center and exit the building when all occupants in your sector have evacuated. If you cannot report in person before you exit the building, make sure to call 4566 to report.

Stairway Monitors

On each floor, one stairwell monitor is assigned to the north stairwells and one to the south stairwells.

Stairway monitors direct evacuees to a safe evacuation route away from areas filled with smoke or other hazards. They regulate the flow of evacuees to the stairwells to prevent overcrowding and respond to the instructions of the floor wardens.

Before an emergency occurs...

- ___ Be familiar with your duties and instructions and those of the other EET members.

Upon the first alarm activation of the emergency alarm system, an alert tone and strobe light will warn of a possible emergency situation...

- ___ Report to the stairway exits and stand by to aid in the evacuation efforts.

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation, occurs...

- _1 Make sure that all evacuees descend using either stairway in a manner that is as rapid, safe, and orderly as possible. If a stairway becomes so crowded that there seems to be little movement, direct the evacuees to a less occupied stairway. To ease redirecting evacuees, ask someone to hold those stairway doors open until all occupants have evacuated from your sector.
- _2 After evacuating the area, close the doors so they continue to work as stairwell protection.
- _3 After the evacuation of your sector is complete, descend to ground level and exit through the lobby doors.

Aides to the Disabled

An aide is assigned by floor wardens to help evacuate any person with a temporary or permanent disability.

Aides go to the workstation of the disabled person to help him or her exit safely away from the building by using a freight elevator or the stairs.

Before an emergency occurs...

- _1 To offer or receive aid, be familiar not only with your own duties and instructions but also with those of the floor warden and elevator monitor.
- _2 Become acquainted with the location of any person with a temporary or permanent disability assigned to you.
- _3 Locate freight elevators 1 and 14.

Designated Headquarters Facility Services employees and/or PPOs will override the elevator system, taking manual control of the freight elevators 1 and 14 that may be used to evacuate persons with disabilities.

Upon the first alarm activation of the emergency alarm system, an alert tone and strobe light will warn of a possible emergency situation...

- ___ Go to the workspace of the disabled person and prepare to evacuate the area.

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation, occurs...

- _1 Call extension 4566 and state your exact location (e.g., "Room 9801, north side, 9th floor") and request a freight elevator for a "disabled pickup." Help the disabled person to the elevator lobby.

- _2 If the emergency situation permits, help the disabled person stay in front of the elevators until a freight elevator comes. Go down to the first floor using the freight elevator designated for evacuation. Then exit with the disabled person through the lobby doors and safely away from the building.
- _3 If more people need to evacuate than the freight elevator can accommodate on the first trip, tell the elevator operator to come back and then watch for the elevator's return.
- _4 If within 5 minutes a freight elevator has not come or the emergency prohibits using the elevators, help the disabled person into the west, double-door stairwell. Find more aid to help the disabled person descend using that stairwell.
- _5 If you cannot find enough help for the disabled persons trying to descend using the stairs, tell the floor warden your location and requirements, and stay with the disabled person in the west, double-door stairwell until help arrives.

If necessary, special evacuation sleds located in the north and south stairwells on the 5th and 11th floors can be used to give disabled persons a ride down the stair nosing of each floor to reach the lobby.

Elevator Monitors

On each floor, one elevator monitor is assigned to the north elevator core and one to the south elevator core.

Before an emergency occurs...

- _1 Understand that if the floor warden cannot get instructions to you, and the aide to the disabled or alternate is not available, you may need to manage the evacuation of disabled persons.
- _2 Be familiar not only with your own duties and instructions but also with those of the floor warden and aide to the disabled, whom you may need to help.

Upon the first alarm activation of the emergency alarm system, an alert tone and strobe lights will warn of a possible emergency situation...

- Report to the elevator lobby in your area of responsibility and stand by to aid with evacuation efforts.

When the second sounding of alert tone, strobes flashing along with the audible voice announcement for evacuation, occurs...

- _1 Do not allow any persons other than disabled persons and aides to use a freight elevator.
- _2 If the emergency permits, help disabled persons stay in front of the freight elevator until it arrives or for 5 minutes.
- _3 If more people need to evacuate than the freight elevator can accommodate on the first trip, tell the elevator operator to come back and then watch for the elevator's return.

- _4 If a freight elevator is unavailable, help the disabled person into the west, double-door stairwell. As necessary, assist the aide to the disabled to locate more assistance to evacuate disabled persons.
- _5 If the emergency prohibits using the elevators, assist aides to the disabled to help all persons with a temporary or permanent disability to descend using the west, double-door stairs.
- _6 After the evacuation of your sector is complete, descend to the ground level and exit through the lobby doors.

Emergency Evacuation Team Assignments

If you manage an organizational unit...

- _1 Fill vacancies on the EET in your unit promptly and report them to the EET leader. The EET leader and the floor wardens can help you.
- _2 Encourage volunteer membership and seek qualified, trained persons with an interest in this work.

If you are considering volunteering for the emergency evacuation team...

— Contact your organization head, floor warden, or EET leader, particularly if you can contribute fire safety ability, first-aid skills, or have similar qualifications or training. Headquarters Facility Services keeps the current list of all Headquarters EET members.

Notice: If you have a known heart disease, epilepsy, chronic obstructive pulmonary disease, or other severe condition, you should not participate on the emergency evacuation team unless you have written permission from your physician.

Inspections and Meetings

Headquarters Facility Services and Corporate Personnel Management safety personnel will conduct annual fire inspections and document them on Form 1784-A, *Safety and Health Inspection Checklist*.

The EET leader must schedule EET meetings as necessary but not less than annually.

Emergency Evacuation Drills

The EET leader schedules an emergency evacuation fire drill at least once a year to familiarize all employees, contractors, and other tenants with emergency evacuation procedures.

Damage Control Team

Headquarters Facility Services has a staff of trained maintenance technicians and mechanics with ample standby equipment and vehicles. The team is capable of conducting any repairs, restorations, and clean-up in a building emergency.

Headquarters Facility Services keeps up-to-date information on the staffing and roles of the damage control team, lists of locations of emergency shutoff valves, equipment in readiness, and other pertinent data useful to floor wardens, security officers, and safety officials.

Fire Prevention Plan

Headquarters Facility Services implements the Fire Prevention Plan and will insure that adequate numbers of working fire extinguishers are available throughout the building and also to extinguish chemical and electrical fires in rooms housing flammable chemicals or large amounts of electrical equipment.

To prevent fires, all employees, contractors, and other tenants must follow fire regulations and maintain good housekeeping at all times while in the building.

Housekeeping

Avoiding Careless or Needless Trash Accumulation

- _1 Dispose of trash according to methods and schedules set up by Headquarters Facility Services as identified in Handbook EL-801, *Supervisor's Safety Handbook*; Handbook EL-803, *Maintenance Employee's Guide to Safety*; and Handbook EL-814, *Postal Employee's Guide to Safety*.
- _2 Neatly arrange stored materials in stockrooms and other storage enclosures with adequate aisles to provide access.
- _3 Do not leave solvents, oily rags, or other flammable materials in the building, unless you place them in provided metal containers that have been approved and covered.

Keeping Areas Unobstructed

At all times in the following situations, all employees, contractors, and other tenants must adhere to the following rules:

- _1 Do not place or store anything in corridors, aisles, or stairways.
- _2 Do not obstruct access to any aisles, stairwells, fire extinguishers, fire hoses, sprinkler valves, or fire alarm boxes.
- _3 Do not obstruct any building exit doors and/or any doors leading to emergency evacuation routes.
- _4 Do not store items closer than 18 inches to sprinkler heads or smoke detectors.

Fire Regulations

Complying With Regulations

All postal employees, contractors, and other tenants located in the Headquarters building must follow these fire regulations:

- _1 Smoking is not permitted anywhere in the building or garage.
- _2 Electric appliances like coffeepots, microwave ovens, refrigerators, fans, and heaters must be authorized by Headquarters Facility Services and Safety personnel. Appliances must meet UL, FM, or other safety specifications and have a visible "on" light located on the unit or wall outlet.
- _3 Authorized appliances must be placed in a safe location away from combustible materials.
- _4 Set up and maintain a system to make sure that coffee pots or other appliances are turned off at the end of each day or when not in use.

Exception: Coffee pots with a reservoir for holding hot water need not be turned off daily.

Note: After a third reported instance of not turning off coffee pots, warmers, and other similar appliances at the end of each day, privileges for using the appliance or coffee service will be suspended.

- _5 **Do not** bring into the building any heat-producing devices such as halogen torch lamps, heaters, hot plates, heating elements, toasters, and other unauthorized electrical appliances.
- _6 **Do not** fasten back or hold open any fire doors. Keep fire doors closed at all times.
- _7 Always consult with Headquarters Facility Services when considering the storage of heavy objects or installation of machines and safes. Do not allow floor loading to exceed the allowable weight limit.

Reporting Violations

- _1 Stay alert for violations or for other situations or conditions that could precipitate a fire or other emergency.
- _2 Report violations to Headquarters Facility Services or use Form 1767, *Report of Hazard, Unsafe Condition, or Practice*, to report violations to your supervisor or manager.

850 Emergency Action Plans and Fire Prevention and Control

851 General Responsibilities

851.1 Installation Heads

Installation heads are responsible for implementing emergency action plans and a fire safety program for the protection of people, mail, and postal property. This program must include (but is not limited to) training, education, inspection, enforcement, drills, emergency evacuation teams, written emergency action plans, written standard operating procedures for hazardous materials spills and leaks, and fire prevention plans as required in this subchapter and in accordance with 29 CFR 1910, Subpart L.

851.2 Managers

Managers and supervisors must be constantly on the alert for fire hazards or other emergency situations and take immediate corrective action for any unsafe practice or condition. If immediate corrective measures are beyond their capabilities, managers must take short-term precautions to ensure the safety of employees and the protection of the workplace. Conditions that cannot be corrected immediately must be reported to a higher authority for corrective action. Managers must ensure that marked aisles and exits are maintained and clear and that all employees are trained in the evacuation and emergency procedures of the installation, including building emergency alarm systems. Supervisors or managers are responsible for ensuring that personal protective equipment is available to employees who respond to spills and breakage involving hazardous materials.

852 Emergency Action Plan

852.1 Responsibility

Each postal facility having more than 10 employees on the rolls must maintain an emergency action plan in writing. If there are 10 or fewer employees, the plan may be communicated verbally. Safety personnel/ collateral duty FSC may provide advice and technical assistance, where needed, in the development of such plans. The plan must include designated actions that management and employees are to take to ensure the safety of employees and the protection of property from fire and other emergencies, e.g., tornadoes, earthquakes, hazardous materials (hazmat) spills. (See Management Instruction EL-810-96-1, *Hazardous Materials and Emergency Response*, for establishment of standard operating procedures for spills and leaks and the relationship to Emergency Action Plans.)

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Include the following elements, as a minimum, in the emergency action plan:

- a. Emergency escape procedures, graphic illustrations of emergency escape route assignments, shelters, and location of fire alarms and extinguishers.
- b. Specific procedures to be followed by employees who remain to operate or shut down critical building systems before they evacuate.
- c. Procedures to account for all employees after emergency evacuation has been completed.
- d. Details of any special assignments.
- e. The preferred means of reporting fires and other emergencies based on local procedures and requirements.
- f. Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan.

852.3 Posting

Post parts (a) and (f) of this plan in a prominent location.

853 Emergency Evacuation Teams and Drills**853.1 Emergency Evacuation Teams****853.11 Organization**

In installations having 10,000 square feet or more, an emergency evacuation team (EET) of postal employees must be maintained on each work tour. EETs may be maintained in smaller installations when warranted by the type of operations conducted. All postal installations having an organized EET must prepare and maintain a written policy statement that establishes the existence of the EET; its basic organizational structure; the type, amount, and frequency of training to be provided EET members; the expected number of members in the EET; and the functions that the EET is to perform at the facility. This statement may be a part of the fire prevention plan.

853.12 Size

The size of the EET depends on the amount of fire-extinguishing and control equipment, the number of exits, and the number of employees on duty. A prearranged schedule must be developed to ensure the availability of the EET.

853.13 Duties of EETs

The organizational statement must clearly indicate that at no time will postal EETs stand and fight any fire beyond the incipient stage, or respond to hazardous materials emergencies. For Postal Service purposes, an incipient fire is one in the initial or beginning stages that can be controlled, contained, or extinguished by portable fire extinguishers without the need for personal protective clothing or self-contained breathing apparatus (SCBA). The use of

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SCBA requires a higher level of skill and training not usually expected of postal employees. Other duties of the EETs include, but are not limited to:

- a. Stopping conveyor belts.
- b. Closing doors to rooms and covers at dump holes and conveyor openings.
- c. Directing the fire department to location of fire.
- d. Evacuating injured and handicapped personnel.
- e. Inspecting the fire site with the fire department to determine that the fire is completely extinguished and that no possibility of rekindling exists.
- f. Moving vans from loading docks.
- g. Shutting down all electrical power to the building or sections as directed by the municipal fire department.
- h. Maintaining perimeter security to prevent reentry until officially instructed to permit it.
- i. Procedures to account for all employees after emergency evacuation has been completed.
- j. Assisting the fire department in maintaining crowd control.

853.14 **Membership**

Building maintenance employees and security personnel should form the nucleus of the EET. Additional personnel may be assigned to assure adequate coverage on all tours. The assigned members are:

- a. *EET Leader.* The installation head is responsible for appointing the EET leader, who should normally be the superintendent for building maintenance or someone in a similar position. The EET leader must establish a procedure to provide quarterly review of the program to ensure operational efficiency.
- b. *Assistant EET Leader.* The EET leader appoints an assistant EET leader.
- c. *EET Members.* EET members are appointed as needed to cover all tours, with an alternate for each member. The alternate should have different off days than the regular member. The EET leader ensures that all persons selected as members of the EET are physically capable of performing the duties that may be assigned to them during training or actual emergencies. Employees with known heart disease, epilepsy, or chronic obstructive pulmonary diseases must not be permitted to participate in any EET activity unless they present a certificate of fitness from their personal physician stating that they are physically capable of performing such duties. Employees with physical disabilities are permitted to be EET members; however, their job assignments must be governed by their ability to perform specific tasks.

853.15 Training

Members are required to complete an initial basic level of training and annual refresher training. Such training and education must be provided to members and alternates before they are expected to perform any EET emergency evacuation team activity. To the extent feasible, Safety and fire department personnel should assist in the establishment and training of the EET. EET leaders and training instructors must be provided training and education that is more comprehensive than that provided to the general membership of the EET. Such training may be available from state firefighting academies and local fire departments. Training for all members must be on the clock and must cover:

- a. Teamwork coordination.
- b. Specific EET duties for each member and alternate.
- c. Familiarization with all fire-extinguishing equipment.
- d. Fire alarm systems and fire and other emergency reporting.
- e. Classifications of fires and the equipment used on each.
- f. Stopping fire along conveyor belts and between work levels.
- g. First aid and rescue procedures.
- h. Conducting EET drills. (EET drills must be conducted at least annually to assure efficiency.)
- i. The facility Hazmat SOP (First Responder Awareness Level).
- j. Special situations, e.g., tornado sheltering, earthquakes, where applicable.

853.16 Exposure

At no time should EET members or alternates perform a task that exceeds their level of skill, ability, or training, or expose themselves or other employees to unnecessary dangers and risks, including hazardous materials emergencies.

853.17 Special Hazards

The EET leader must inform EET members and alternates about special hazards such as storage and use of flammable liquids and gases, toxic chemicals, radioactive sources, and water reactive substances to which they may be exposed during fire or other emergencies. The EET members also must be advised of any changes that occur in relation to the special hazards. The EET leader must develop and make available for inspection by EET members written procedures that describe the actions to be taken in situations involving the special hazards and must include these in the training and education program (see facility written hazard communication program).

853.18 Installations Without EETs (Less Than 10,000 Square Feet)

In installations that do not have EETs, the installation head is responsible for ensuring that supervisors or employees are assigned the following functions in case of fire or other emergency:

- a. Notification of fire department, police, ambulance, or other emergency services.
- b. Prompt evacuation of personnel including injured or handicapped employees.
- c. Procedures to account for all employees after emergency evacuation has been completed.
- d. Security of mail, monies, receipts, and accountable and valuable papers.
- e. Use of fire extinguishers.

853.2 Drills

At least one emergency evacuation must be conducted annually on each work tour. Sheltering drills are appropriate in locations prone to tornadoes or earthquakes. The importance of fire drill training must be impressed upon all postal employees. In conducting fire drills, the following objectives must be met:

- a. Sounding of alarms and prompt notification of fire department, police, or other emergency services.
- b. Orderly evacuation in minimum time.
- c. Security of mail, monies, receipts, and valuable papers.
- d. Emergency plan assignments by designated EET members and alternates.

854 Fire Prevention Plan**854.1 Responsibility**

Each installation head managing a postal facility with more than 10,000 square feet must maintain a written fire prevention plan. Installation heads managing smaller facilities may maintain written fire prevention plans when warranted by the type of operations conducted. Safety personnel/collateral duty FSC may provide advice and technical assistance, where needed, in the development of such plans.

854.2 Content

Include the following elements, as a minimum, in the fire prevention plan:

- a. A list of the significant, potential workplace fire hazards; handling, storage, and control procedures; potential ignition sources (such as welding, electrical equipment, and heaters); and the type of fire protection equipment or system present that can contain, extinguish, or control fires.

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- b. Names or regular job titles of personnel responsible for maintenance of equipment installed to prevent or control fires.
- c. Names or regular job titles of personnel responsible for control of fuel-source hazards.
- d. Procedures to be used to control the accumulation of flammable and combustible waste materials and waste residues so that they do not contribute to a fire emergency.

854.3 **Employee Training**854.31 **General**

Employees must be instructed at least annually, and any time there is a change in the plan or their role, by their immediate supervisor in:

- a. The evacuation and emergency procedures of the installation.
- b. The use of fire-extinguishing equipment. Employees whose work station is in, or adjacent to, high-hazard operations must be trained in the use of appropriate fire-extinguishing equipment for that specific operation.
- c. Good housekeeping practices.
- d. The observance of smoking rules.
- e. Hazmat SOPs using Handbook EL-812, *Hazardous Materials and Spill Response*.

854.32 **Training for the Emergency Action Plan and Fire Prevention Plan**854.321 **Emergency Action Plan**

To maintain the emergency action plan, a sufficient number of employees must be designated and trained to assist in the execution of a safe and orderly emergency evacuation, and dealing with incidental and emergency releases of hazardous materials in the mails and elsewhere. See MI EL-810-96-1, *Response to Hazardous Materials Releases*. This pool of employees must be kept current.

854.322 **Fire Prevention Plan**

To maintain the fire prevention plan, the immediate supervisor must inform all employees of the fire hazards in the work area to which they may be exposed.

854.323 **Orientation**

The immediate supervisor must orient all newly assigned employees to those parts of the plans that the employees must know to protect themselves in the event of an emergency.

854.324 **Review**

The written plans must be kept at the workplace and be made available for employee review. The emergency action and fire prevention plans must be reviewed with each employee of the installation:

- a. Annually.
- b. Whenever there is a change in employee responsibilities or designated actions under the plans.
- c. Whenever the plans are revised.

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856.1

855 **Fire Inspections**

855.1 **Responsibility**

Managers and supervisors that have been trained by safety and/or fire protection personnel must conduct fire inspections. Training must include the conduct of inspections, identification of unsafe practices causing fires, and the methods of eliminating or correcting hazards. The installation head is encouraged to seek assistance from local fire officials and permit them to conduct fire inspections and prefire planning programs.

855.2 **Frequency**

Fire inspections must be conducted in all postal-owned and postal-leased installations. Semi-annual inspections are required in all installations with less than 100 workyears of employment in the regular workforce. Quarterly fire inspections are required in all installations with more than 100 workyears of employment in the regular workforce and VMFs.

855.3 **Procedures**

Fire inspections may be scheduled to coincide with semiannual or annual safety inspections. They must be documented using fire inspection checklists available in the Safety Toolkit and published periodically.

855.4 **Corrective Action**

Deficiencies identified in safety checklists must be reviewed by the hazard abatement committee and corrected.

Local authorities must be notified immediately upon discovery of fire hazards that are not under postal jurisdiction, but that affect postal personnel, mail, or property.

856 **Alarm Systems and Extinguishers**

856.1 **Alarm Systems**

Every postal facility must have an established employee alarm system that complies with OSHA Standard 29 CFR 1910.165 and that includes:

- a. Procedures for informing each employee of the preferred means of reporting emergencies, such as manual pull-box alarms, horns, public address systems, radio, or telephones. The installation head must have emergency telephone numbers posted near telephones, on employee bulletin boards, and at other conspicuous locations where telephones serve as a means of reporting emergencies. Where a communication system also serves as the employee alarm system, all emergency messages must have priority over all nonemergency messages.
- b. Procedures for sounding emergency alarms in the workplace. For those installations with ten or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding

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the alarm provided all employees can hear the alarm. Such workplaces need not have a backup system. An alarm device must:

- (1) Give a warning that provides sufficient reaction time for safe escape of employees from the workplace, or the immediate work area, or both.
 - (2) Have the capability of being heard or seen above ambient noise or light levels by all employees in the affected areas of the workplace. Tactile devices may be used to alert employees who would not be able to recognize the audible or visual alarms.
 - (3) Give a distinctive and recognizable signal to evacuate the work area or to perform actions designated under the emergency action plan. If the employee alarm system is also used for alerting emergency evacuation team members or for other purposes, a distinctive signal for each purpose must be used.
- c. Procedures for maintenance and testing of employee alarm systems in compliance with appropriate NFPA and OSHA standards.

856.2 Extinguisher

The number, type, location, maintenance, and inspection of fire-extinguisher equipment and systems must be in accordance with Handbook MS-56, *Fire Prevention and Control*, and 29 CFR 1910.157-1910.163 as required.

Exception: The maximum travel distance to any portable fire extinguisher must not exceed 50 feet.

Fire-fighting equipment that is in damaged or unserviceable condition must be removed from service and replaced immediately.

857 Vehicle Protection

Fire extinguishers and emergency warning kits are to be placed in vehicles in accordance with Handbook PO-701, *Fleet Management*.

858 Codes, Standards, and Ordinances

Compliance with Postal Service standards, OSHA standards, National Fire Protection Codes (NFPA), National Building Codes, and state and local fire codes is required. Managers must refer matters concerning fire prevention, extinguishment, and control, which are not covered by municipal or other regulations, to higher authority for resolution.

Guidance for Postal Service Hazmat First Responders

The current problem with anthrax hoaxes and actual terrorist activities has created a difficult situation for first responders to incidental spills and leaks of hazardous materials.

First Responders in the postal system are only trained and authorized to deal with minor spills and leaks of hazardous materials, usually consumer commodity-type substances. They are not expected to clean up or take other actions when confronted with emergency spill or release of a dangerous biological substance.

A known or suspected release of anthrax spores is an emergency. Clear guidelines for what to do have already been issued and reiterated many times. This guidance is being posted on the Safety Toolkit Resources web page.

Clearly, most spills and leaks in the mail will continue to be of the incidental variety and will not involve emergency releases of hazardous materials, or anthrax spores.

Therefore, First Responders can follow established procedures, based on their training, when an incidental release is certain. The following guidelines should be used to determine if a release is incidental or a non-anthrax-related emergency:

POWDERS AND SIMILAR MATERIALS:

- If the initial report involves the release of a powder-like substance *from a mail piece* isolate the area immediately shut down the ventilation system. Also shut down any processing equipment or machinery that may have processed or damaged the mailpiece. The goal is to avoid spreading the contamination in the air.
- Remove employees from the immediate area. Ask the person who discovered the release if there was any label or marking that would identify the spilled material. Commercially packaged products such as soup mixes or soap powder obviously wouldn't be hazardous.
- If possible identify the mailer or addressee and determine what was mailed. This should be done without disturbing the parcel or immediate surroundings (use binoculars for example). If it can be confirmed that the mailing was innocent, proceed with normal cleanup procedures. **If the nature of the spilled powder cannot be confirmed within a short time, initiate emergency procedures.**
- Discovery of loose powders and similar materials not directly associated with mail – in a swing room, locker room or aisles, for example – are unlikely to be hazardous. Everything from donut powdered sugar to spilled makeup has caused unnecessary alarm, disruption to operations and wasted emergency resources.
- Unless there is compelling evidence to the contrary, these materials should be cleaned up with standard procedures. As a precaution, the materials can be soaked in a 1-10-bleach solution for 10 minutes, which would kill any organisms.

LIQUIDS:

- There is no evidence of any mailing with intent to cause harm that involves biological or chemical hazards in liquid form. If a package is leaking a liquid, follow normal procedures for determining if the release is incidental and can be cleaned up by postal First Responders, or is an emergency requiring outside response.

SMOKE, FUMES, and VAPORS:

- Any package releasing visible smoke, fumes or irritating vapors or gases is considered an emergency under postal hazmat policy. The immediate area should be evacuated and outside help called.



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Regulations (Standards - 29 CFR)

Authority for 1910 Subpart E - 1910 Subpart E

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- **Part Number:** 1910
- **Part Title:** Occupational Safety and Health Standards
- **Subpart:** E
- **Subpart Title:** Exit Routes, Emergency Action Plans, and Fire Prevention Plans
- **Standard Number:** [1910 Subpart E](#)
- **Title:** Authority for 1910 Subpart E

Authority: Secs. 4, 6, 8, Occupational Safety and Health Act of 1970 (29 U.S.C. 653, 655, 657); Secretary of Labor's Order Nos. 12-71 (36 FR 8754), (8-76 41 FR 25059), 9-83 (48 FR 35736) or 1-90 (55 FR 9033), 6-96 (62 FR 111), or 3-2000 (65 FR 50017), as applicable.

[58 FR 35308, June 30, 1993; 61 FR 9227, March 7, 1996; FR 67961, Nov. 7, 2002]

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• Part Number:	1910
• Part Title:	Occupational Safety and Health Standards
• Subpart:	E
• Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
• Standard Number:	1910.33
• Title:	Table of contents.

This section lists the sections and paragraph headings contained in §§ 1910.34 through 1910.39.

§ 1910.34 Coverage and definitions.

- (a) *Every employer is covered.*
- (b) *Exit routes are covered.*
- (c) *Definitions.*

§ 1910.35 Compliance with NFPA 101-2000, Life Safety Code.

§ 1910.36 Design and construction requirements for exit routes.

- (a) *Basic requirements.*
- (b) *The number of exit routes must be adequate.*
- (c) *Exit discharge.*
- (d) *An exit door must be unlocked.*
- (e) *A side-hinged exit door must be used.*
- (f) *The capacity of an exit route must be adequate.*
- (g) *An exit route must meet minimum height and width requirements.*
- (h) *An outdoor exit route is permitted.*

§ 1910.37 Maintenance, safeguards, and operational features for exit routes.

- (a) *The danger to employees must be minimized.*
- (b) *Lighting and marking must be adequate and appropriate.*
- (c) *The fire retardant properties of paints or solutions must be maintained.*
- (d) *Exit routes must be maintained during construction, repairs, or alterations.*
- (e) *An employee alarm system must be operable.*

§ 1910.38 Emergency action plans.

- (a) Application.**
- (b) Written and oral emergency action plans.**
- (c) Minimum elements of an emergency action plan.**
- (d) Employee alarm system.**
- (e) Training.**
- (f) Review of emergency action plan.**

§ 1910.39 Fire prevention plans.

- (a) Application.**
- (b) Written and oral fire prevention plans.**
- (c) Minimum elements of a fire prevention plan.**
- (d) Employee information.**

[67 FR 67961, Nov. 7, 2002]

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Regulations (Standards - 29 CFR) Coverage and definitions. - 1910.34

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• Part Number:	1910
• Part Title:	Occupational Safety and Health Standards
• Subpart:	E
• Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
• Standard Number:	<u>1910.34</u>
• Title:	Coverage and definitions.

1910.34(a)

Every employer is covered. Sections 1910.34 through 1910.39 apply to workplaces in general industry except mobile workplaces such as vehicles or vessels.

1910.34(b)

Exits routes are covered. The rules in §§ 1910.34 through 1910.39 cover the minimum requirements for exit routes that employers must provide in their workplace so that employees may evacuate the workplace safely during an emergency. Sections 1910.34 through 1910.39 also cover the minimum requirements for emergency action plans and fire prevention plans.

1910.34(c)

Definitions.

Electroluminescent means a light-emitting capacitor. Alternating current excites phosphor atoms when placed between the electrically conductive surfaces to produce light. This light source is typically contained inside the device.

Exit means that portion of an exit route that is generally separated from other areas to provide a protected way of travel to the exit discharge. An example of an exit is a two-hour fire resistance-rated enclosed stairway that leads from the fifth floor of an office building to the outside of the building.

Exit access means that portion of an exit route that leads to an exit. An example of an exit access is a corridor on the fifth floor of an office building that leads to a two-hour fire resistance-rated enclosed stairway (the Exit).

Exit discharge means the part of the exit route that leads directly outside or to a street, walkway, refuge area, public way, or open space with access to the

outside. An example of an exit discharge is a door at the bottom of a two-hour fire resistance-rated enclosed stairway that discharges to a place of safety outside the building.

Exit route means a continuous and unobstructed path of exit travel from any point within a workplace to a place of safety (including refuge areas). An exit route consists of three parts: The exit access; the exit; and, the exit discharge. (An exit route includes all vertical and horizontal areas along the route.)

High hazard area means an area inside a workplace in which operations include high hazard materials, processes, or contents.

Occupant load means the total number of persons that may occupy a workplace or portion of a workplace at any one time. The occupant load of a workplace is calculated by dividing the gross floor area of the workplace or portion of a workplace by the occupant load factor for that particular type of workplace occupancy. Information regarding "Occupant load" is located in NFPA 101-2000, Life Safety Code.

Refuge area means either:

1910.34(c)(1)

A space along an exit route that is protected from the effects of fire by separation from other spaces within the building by a barrier with at least a one-hour fire resistance-rating; or

1910.34(c)(2)

A floor with at least two spaces, separated from each other by smoke-resistant partitions, in a building protected throughout by an automatic sprinkler system that complies with § 1910.159 of this part.

Self-luminous means a light source that is illuminated by a self-contained power source (*e.g.*, tritium) and that operates independently from external power sources. Batteries are not acceptable self-contained power sources. The light source is typically contained inside the device.

[FR 67 67962, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Compliance with NFPA 101-2000, Life Safety Code. - 1910.35

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- **Part Number:** 1910
- **Part Title:** Occupational Safety and Health Standards
- **Subpart:** E
- **Subpart Title:** Exit Routes, Emergency Action Plans, and Fire Prevention Plans
- **Standard Number:** 1910.35
- **Title:** Compliance with NFPA 101-2000, Life Safety Code.

An employer who demonstrates compliance with the exit route provisions of NFPA 101-2000, the Life Safety Code, will be deemed to be in compliance with the corresponding requirements in §§ 1910.34, 1910.36, and 1910.37.

[39 FR 23502, June 27, 1974, as amended at 45 FR 60703, Sept. 12, 1980; 53 FR 12121, Apr. 12, 1988; 67 FR 67962, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Design and construction requirements for exit routes. - 1910.36

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● Part Number:	1910
● Part Title:	Occupational Safety and Health Standards
● Subpart:	E
● Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
● Standard Number:	<u>1910.36</u>
● Title:	Design and construction requirements for exit routes.

1910.36(a)

Basic requirements. Exit routes must meet the following design and construction requirements:

1910.36(a)(1)

An exit route must be permanent. Each exit route must be a permanent part of the workplace.

1910.36(a)(2)

An exit must be separated by fire resistant materials. Construction materials used to separate an exit from other parts of the workplace must have a one-hour fire resistance-rating if the exit connects three or fewer stories and a two-hour fire resistance-rating if the exit connects four or more stories.

1910.36(a)(3)

Openings into an exit must be limited. An exit is permitted to have only those openings necessary to allow access to the exit from occupied areas of the workplace, or to the exit discharge. An opening into an exit must be protected by a self-closing fire door that remains closed or automatically closes in an emergency upon the sounding of a fire alarm or employee alarm system. Each fire door, including its frame and hardware, must be listed or approved by a nationally recognized testing laboratory. Section 1910.155(c)(3)(iv)(A) of this part defines "listed" and § 1910.7 of this part defines a "nationally recognized testing laboratory."

1910.36(b)

The number of exit routes must be adequate.

1910.36(b)(1)

Two exit routes. At least two exit routes must be available in a workplace to permit prompt evacuation of employees and other building occupants during an emergency, except as allowed in paragraph (b)(3) of this section. The exit routes must be located as far away as practical from each other so that if one exit route is blocked by fire or smoke, employees can evacuate using the second exit route.

..1910.36(b)(2)

1910.36(b)(2)

More than two exit routes. More than two exit routes must be available in a workplace if the number of employees, the size of the building, its occupancy, or the arrangement of the workplace is such that all employees would not be able to evacuate safely during an emergency.

1910.36(b)(3)

A single exit route. A single exit route is permitted where the number of employees, the size of the building, its occupancy, or the arrangement of the workplace is such that all employees would be able to evacuate safely during an emergency.

Note to paragraph 1910.36(b): For assistance in determining the number of exit routes necessary for your workplace, consult NFPA 101-2000, Life Safety Code.

1910.36(c)

Exit discharge.

1910.36(c)(1)

Each exit discharge must lead directly outside or to a street, walkway, refuge area, public way, or open space with access to the outside.

1910.36(c)(2)

The street, walkway, refuge area, public way, or open space to which an exit discharge leads must be large enough to accommodate the building occupants likely to use the exit route.

1910.36(c)(3)

Exit stairs that continue beyond the level on which the exit discharge is located must be interrupted at that level by doors, partitions, or other effective means that clearly indicate the direction of travel leading to the exit discharge.

..1910.36(d)

1910.36(d)

An exit door must be unlocked.

1910.36(d)(1)

Employees must be able to open an exit route door from the inside at all times without keys, tools, or special knowledge. A device such as a panic bar that locks only from the outside is permitted on exit discharge doors.

1910.36(d)(2)

Exit route doors must be free of any device or alarm that could restrict emergency use of the exit route if the device or alarm fails.

1910.36(d)(3)

An exit route door may be locked from the inside only in mental, penal, or correctional facilities and then only if supervisory personnel are continuously on duty and the employer has a plan to remove occupants from the facility during an emergency.

1910.36(e)

A side-hinged exit door must be used.

1910.36(e)(1)

A side-hinged door must be used to connect any room to an exit route.

1910.36(e)(2)

The door that connects any room to an exit route must swing out in the direction of exit travel if the room is designed to be occupied by more than 50 people or if the room is a high hazard area (*i.e.*, contains contents that are likely to burn with extreme rapidity or explode).

1910.36(f)

The capacity of an exit route must be adequate.

1910.36(f)(1)

Exit routes must support the maximum permitted occupant load for each floor served.

1910.36(f)(2)

The capacity of an exit route may not decrease in the direction of exit route travel to the exit discharge.

Note to paragraph 1910.36(f): Information regarding "Occupant load" is located in NFPA 101-2000, Life Safety Code.

..1910.36(g)

1910.36(g)

An exit route must meet minimum height and width requirements.

1910.36(g)(1)

The ceiling of an exit route must be at least seven feet six inches (2.3 m) high. Any projection from the ceiling must not reach a point less than six feet eight inches (2.0 m) from the floor.

1910.36(g)(2)

An exit access must be at least 28 inches (71.1 cm) wide at all points. Where there is only one exit access leading to an exit or exit discharge, the width of the exit and exit discharge must be at least equal to the width of the exit access.

1910.36(g)(3)

The width of an exit route must be sufficient to accommodate the maximum permitted occupant load of each floor served by the exit route.

1910.36(g)(4)

Objects that project into the exit route must not reduce the width of the exit route to less than the minimum width requirements for exit routes.

1910.36(h)

An outdoor exit route is permitted.

1910.36(h)(1)

The outdoor exit route must have guardrails to protect unenclosed sides if a fall hazard exists;

1910.36(h)(2)

The outdoor exit route must be covered if snow or ice is likely to accumulate along the route, unless the employer can demonstrate that any snow or ice accumulation will be removed before it presents a slipping hazard;

1910.36(h)(3)

The outdoor exit route must be reasonably straight and have smooth, solid, substantially level walkways; and

1910.36(h)(4)

The outdoor exit route must not have a dead-end that is longer than 20 feet (6.2 m).

[FR 67 67962, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Maintenance, safeguards, and operational features for exit routes. - 1910.37

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● Part Number:	1910
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● Subpart:	E
● Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
● Standard Number:	<u>1910.37</u>
● Title:	Maintenance, safeguards, and operational features for exit routes.

1910.37(a)

The danger to employees must be minimized.

1910.37(a)(1)

Exit routes must be kept free of explosive or highly flammable furnishings or other decorations.

1910.37(a)(2)

Exit routes must be arranged so that employees will not have to travel toward a high hazard area, unless the path of travel is effectively shielded from the high hazard area by suitable partitions or other physical barriers.

1910.37(a)(3)

Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route. The exit access must not go through a room that can be locked, such as a bathroom, to reach an exit or exit discharge, nor may it lead into a dead-end corridor. Stairs or a ramp must be provided where the exit route is not substantially level.

1910.37(a)(4)

Safeguards designed to protect employees during an emergency (**e.g.**, sprinkler systems, alarm systems, fire doors, exit lighting) must be in proper working order at all times.

1910.37(b)

Lighting and marking must be adequate and appropriate.

1910.37(b)(1)

Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route.

1910.37(b)(2)

Each exit must be clearly visible and marked by a sign reading "Exit."

1910.37(b)(3)

Each exit route door must be free of decorations or signs that obscure the visibility of the exit route door.

..1910.37(b)(4)

1910.37(b)(4)

If the direction of travel to the exit or exit discharge is not immediately apparent, signs must be posted along the exit access indicating the direction of travel to the nearest exit and exit discharge. Additionally, the line-of-sight to an exit sign must clearly be visible at all times.

1910.37(b)(5)

Each doorway or passage along an exit access that could be mistaken for an exit must be marked "Not an Exit" or similar designation, or be identified by a sign indicating its actual use (***e.g.***, closet).

1910.37(b)(6)

Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs that have a minimum luminance surface value of at least .06 footlamberts (0.21 cd/m²) are permitted.

1910.37(b)(7)

Each exit sign must have the word "Exit" in plainly legible letters not less than six inches (15.2 cm) high, with the principal strokes of the letters in the word "Exit" not less than three-fourths of an inch (1.9 cm) wide.

1910.37(c)

The fire retardant properties of paints or solutions must be maintained.
Fire retardant paints or solutions must be renewed as often as necessary to maintain their fire retardant properties.

1910.37(d)

Exit routes must be maintained during construction, repairs, or alterations.

1910.37(d)(1)

During new construction, employees must not occupy a workplace until the exit routes required by this subpart are completed and ready for employee use for the portion of the workplace they occupy.

1910.37(d)(2)

During repairs or alterations, employees must not occupy a workplace unless the exit routes required by this subpart are available and existing fire protections are maintained, or until alternate fire protection is furnished that provides an equivalent level of safety.

1910.37(d)(3)

Employees must not be exposed to hazards of flammable or explosive substances or equipment used during construction, repairs, or alterations, that are beyond the normal permissible conditions in the workplace, or that would impede exiting the workplace.

1910.37(e)

An employee alarm system must be operable. Employers must install and maintain an operable employee alarm system that has a distinctive signal to warn employees of fire or other emergencies, unless employees can promptly see or smell a fire or other hazard in time to provide adequate warning to them. The employee alarm system must comply with § 1910.165.

[39 FR 23502, June 27, 1974, as amended at 45 FR 60703, Sept. 12, 1980; 67 FR 67963, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Emergency action plans. - 1910.38

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● Part Number:	1910
● Part Title:	Occupational Safety and Health Standards
● Subpart:	E
● Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
● Standard Number:	<u>1910.38</u>
● Title:	Emergency action plans.

1910.38(a)

Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.

1910.38(b)

Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

1910.38(c)

Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:

1910.38(c)(1)

Procedures for reporting a fire or other emergency;

..1910.38 (c)(2)

1910.38(c)(2)

Procedures for emergency evacuation, including type of evacuation and exit route assignments;

1910.38(c)(3)

Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;

1910.38(c)(4)

Procedures to account for all employees after evacuation;

1910.38(c)(5)

Procedures to be followed by employees performing rescue or medical duties;
and

1910.38(c)(6)

The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

1910.38(d)

Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in § 1910.165.

1910.38(e)

Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.

1910.38(f)

Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:

1910.38(f)(1)

When the plan is developed or the employee is assigned initially to a job;

1910.38(f)(2)

When the employee's responsibilities under the plan change; and

1910.38(f)(3)

When the plan is changed.

[45 FR 60703, Sept. 12, 1980; FR 67 67963, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Fire prevention plans. - 1910.39

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• Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
• Standard Number:	<u>1910.39</u>
• Title:	Fire prevention plans.

1910.39(a)

Application. An employer must have a fire prevention plan when an OSHA standard in this part requires one. The requirements in this section apply to each such fire prevention plan.

1910.39(b)

Written and oral fire prevention plans. A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.

1910.39(c)

Minimum elements of a fire prevention plan. A fire prevention plan must include:

1910.39(c)(1)

A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard;

1910.39(c)(2)

Procedures to control accumulations of flammable and combustible waste materials;

1910.39(c)(3)

Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials;

1910.39(c)(4)

The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires; and

1910.39(c)(5)

The name or job title of employees responsible for the control of fuel source hazards.

1910.39(d)

Employee information. An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.

[FR 67 67963, Nov. 7, 2002]

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Regulations (Standards - 29 CFR)

Exit Routes, Emergency Action Plans, and Fire Prevention Plans. - 1910 Subpart E App

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• Subpart:	E
• Subpart Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans
• Standard Number:	1910 Subpart E App
• Title:	Exit Routes, Emergency Action Plans, and Fire Prevention Plans.

This appendix serves as a nonmandatory guideline to assist employers in complying with the appropriate requirements of subpart E.

1910.38 Employee emergency plans

1. "Emergency action plan elements." The emergency action plan should address emergencies that the employer may reasonably expect in the workplace. Examples are: fire; toxic chemical releases; hurricanes; tornadoes; blizzards; floods; and others. The elements of the emergency action plan presented in paragraph 1910.38(c) can be supplemented by the following to more effectively achieve employee safety and health in an emergency. The employer should list in detail the procedures to be taken by those employees who have been selected to remain behind to care for essential plant operations until their evacuation becomes absolutely necessary. Essential plant operations may include the monitoring of plant power supplies, water supplies, and other essential services which cannot be shut down for every emergency alarm. Essential plant operations may also include chemical or manufacturing processes which must be shut down in stages or steps where certain employees must be present to assure that safe shut down procedures are completed.

The use of floor plans or workplace maps which clearly show the emergency escape routes should be included in the emergency action plan. Color coding will aid employees in determining their route assignments.

The employer should also develop and explain in detail what rescue and medical first aid duties are to be performed and by whom. All employees are to be told what actions they are to take in these emergency situations that the employer anticipates may occur in the workplace.

2. "Emergency evacuation." At the time of an emergency, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In some cases where the emergency is very grave, total and immediate evacuation of all employees is necessary. In other emergencies, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued plant operation. In some cases, only

those employees in the immediate area of the fire may be expected to evacuate or move to a safe area such as when a local application fire suppression system discharge employee alarm is sounded. Employees must be sure that they know what is expected of them in all such emergency possibilities which have been planned in order to provide assurance of their safety from fire or other emergency.

The designation of refuge or safe areas for evacuation should be determined and identified in the plan. In a building divided into fire zones by fire walls, the refuge area may still be within the same building but in a different zone from where the emergency occurs.

Exterior refuge or safe areas may include parking lots, open fields or streets which are located away from the site of the emergency and which provide sufficient space to accommodate the employees. Employees should be instructed to move away from the exit discharge doors of the building, and to avoid congregating close to the building where they may hamper emergency operations.

3. "Emergency action plan training." The employer should assure that an adequate number of employees are available at all times during working hours to act as evacuation wardens so that employees can be swiftly moved from the danger location to the safe areas. Generally, one warden for each twenty employees in the workplace should be able to provide adequate guidance and instruction at the time of a fire emergency. The employees selected or who volunteer to serve as wardens should be trained in the complete workplace layout and the various alternative escape routes from the workplace. All wardens and fellow employees should be made aware of handicapped employees who may need extra assistance, such as using the buddy system, and of hazardous areas to be avoided during emergencies. Before leaving, wardens should check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area.

After the desired degree of evacuation is completed, the wardens should be able to account for or otherwise verify that all employees are in the safe areas.

In buildings with several places of employment, employers are encouraged to coordinate their plans with the other employers in the building. A building-wide or standardized plan for the whole building is acceptable provided that the employers inform their respective employees of their duties and responsibilities under the plan. The standardized plan need not be kept by each employer in the multi-employer building, provided there is an accessible location within the building where the plan can be reviewed by affected employees. When multi-employer building-wide plans are not feasible, employers should coordinate their plans with the other employers within the building to assure that conflicts and confusion are avoided during times of emergencies. In multi-story buildings where more than one employer is on a single floor, it is essential that these employers coordinate their plans with each other to avoid conflicts and confusion.

4. "Fire prevention housekeeping." The standard calls for the control of accumulations of flammable and combustible waste materials.

It is the intent of this standard to assure that hazardous accumulations of combustible waste materials are controlled so that a fast developing fire, rapid spread of toxic smoke, or an explosion will not occur. This does not necessarily mean that each room has to be swept each day. Employers and employees should be aware of the hazardous properties of materials in their workplaces,

and the degree of hazard each poses. Certainly oil soaked rags have to be treated differently than general paper trash in office areas. However, large accumulations of waste paper or corrugated boxes, etc., can pose a significant fire hazard. Accumulations of materials which can cause large fires or generate dense smoke that are easily ignited or may start from spontaneous combustion, are the types of materials with which this standard is concerned. Such combustible materials may be easily ignited by matches, welder's sparks, cigarettes and similar low level energy ignition sources.

5. "Maintenance of equipment under the fire prevention plan." Certain equipment is often installed in workplaces to control heat sources or to detect fuel leaks. An example is a temperature limit switch often found on deep-fat food fryers found in restaurants. There may be similar switches for high temperature dip tanks, or flame failure and flashback arrester devices on furnaces and similar heat producing equipment. If these devices are not properly maintained or if they become inoperative, a definite fire hazard exists. Again employees and supervisors should be aware of the specific type of control devices on equipment involved with combustible materials in the workplace and should make sure, through periodic inspection or testing, that these controls are operable. Manufacturers' recommendations should be followed to assure proper maintenance procedures.

[45 FR 60714, Sept. 12, 1980; 67 FR 67961, Nov. 7, 2002]

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How to File a Complaint with OSHA

The Occupational Safety and Health Act of 1970 gives employees the right to file complaints about workplace safety and health hazards. Further, the Act gives complainants the right to request that their names not be revealed to their employers. Complaints from employees and their representatives are taken seriously by OSHA.

If you would like to report hazards at your worksite to OSHA, or you have been discriminated against on the basis of safety and health issues, choose one of the following:

- File a complaint, online if you believe your working conditions are unsafe or unhealthful. (**Note:** Most online complaints are addressed by OSHA's phone/fax system. That means they may be resolved informally over the phone with your employer. Written, signed complaints submitted to OSHA Area or State Plan offices are more likely to result in onsite OSHA inspections; see complaint handling process. Complaints from workers in OSHA-approved state plan states will be forwarded to the appropriate state plan for response.) If you are concerned about confidentiality, you may prefer to file your complaint from your home computer or a computer in your local library.
- **Download** the OSHA complaint form, complete it and then **fax or mail** it to your local OSHA Regional Office or you may simply contact your local OSHA office to receive a copy of the complaint form. Be sure to include your name, address and telephone number so we can contact you.

NOTE: In order to view and print the complaint form, you must have the Adobe Acrobat Reader on your computer.

- Telephone your local OSHA Regional Office. OSHA staff can discuss your complaint and respond to any questions you have.
- File a discrimination complaint if your employer has punished you for exercising any employee rights established under the OSH Act or for refusing to work when faced with an imminent danger of death or serious injury and there is insufficient time for OSHA to inspect. You can file a complaint by calling your local OSHA Regional Office. In states with approved state plans, employees may file a complaint with both the State and Federal OSHA.
- **If there is an emergency or the hazard is immediately life-threatening, call your local OSHA Regional Office or 1-800-321-OSHA.**

Additional Information

For more information on filing a complaint, see the following:

[When can a complaint be filed?](#)

[Who can complain?](#)

[What information must the employee give?](#)

How does OSHA respond to complaints?

What happens in states operating approved safety and health programs?

When Can a Complaint Be Filed?

OSHA recommends that employees try to resolve safety and health issues first by reporting them to their supervisors, managers or the safety and health committee. At any time, however, employees can complain to their local OSHA Regional Office and ask for an inspection or an investigation. (Complaints to federal OSHA from workers in states with OSHA-approved state plans will be forwarded to the appropriate state plan for response.)

Who Can Complain?

Employees or their representatives have a right to request an inspection of a workplace if they believe there is a violation of a safety or health standard, or if there is any danger that threatens physical harm, or if an "imminent danger" exists. Anyone who knows about a workplace safety or health hazard may complain, and OSHA will investigate the concerns reported.

What Information Must the Employee Provide?

Employees or their representatives must provide enough information for OSHA to determine that a hazard probably exists. Workers do not have to know whether a specific OSHA standard has been violated in order to file a complaint.

Because it is important to give as much complete and accurate information as possible about an alleged hazard, answers to the following types of questions may be useful:

- How many employees work at the site and how many are exposed to the hazard?
- How and when are workers exposed?
- What work is performed in the unsafe or unhealthful area?
- What type of equipment is used? Is it in good condition?
- What materials and/or chemicals are used?
- Have employees been informed or trained regarding hazardous conditions?
- What process and/or operation is involved?
- What kinds of work are done nearby?
- How often and for how long do employees work at the task that leads to their exposure?
- How long (to your knowledge) has the condition existed?
- Have any attempts been made to correct the problem?
- How many shifts work in the area and what times do they start? On what shifts does the hazard exist?
- What personal protective equipment is required by the employer? Is the equipment used by the employees?
- Has anyone been injured or made ill as a result of this problem?
- Have there been any "near-miss" incidents?

The following are some additional specific questions for health hazards:

- Has the employer conducted any tests to determine if employees are exposed to the hazardous condition or substance?
- What are these tests and the results of the tests?
- What steps has the employer taken, if any, to control the hazard?
- Do any employees have any symptoms that they think are caused by the hazardous condition or substance?

- Have any employees been treated by a doctor for a work-related disease or condition? What was it?

(Note: It is not necessary to have the answers to all the questions in order to file a complaint. The list is provided here as a guide.)

How does federal OSHA Respond to Complaints?

There are two ways that OSHA can respond to a complaint. OSHA can either perform an on-site inspection or an off-site investigation, also known as a "phone/fax investigation."

Although every worker has a right to receive an onsite inspection if certain conditions are met, there are times when a phone/fax (or letter) investigation may be a better alternative. OSHA responds more quickly to lower priority hazards using a phone/fax approach. This enables the agency to concentrate resources on the most serious workplace hazards. Employees who request a phone/fax investigation do not give up the right to request an on-site inspection of potential violations and hazards if they are not satisfied with the investigation. Workers should call their nearest **OSHA Area Office** to discuss their options.

If an off-site investigation is appropriate, the agency telephones the employer, describes the alleged hazards and then follows up with a fax or letter. The employer must respond in writing within five days, identifying any problems found and noting corrective actions taken or planned. If the response is adequate, OSHA generally will not conduct an inspection. The employee or employee representative who filed the original complaint will receive a copy of the employer's response and, if still not satisfied, may then request an on-site inspection.

If the employee or employee representative files a written complaint that meets certain conditions described in OSHA Directive CPL 2.115, or a state plan's equivalent procedures, then OSHA may conduct an on-site inspection. Those conditions include claims of serious physical harm that have already resulted in disabling injuries or illnesses or claims of imminent danger situations; written, signed complaints requesting inspections; and situations where the employer provided an inadequate response to a phone/fax investigation.

What happens in states operating approved safety and health programs?

States with OSHA-approved state plans provide the same protections to workers as federal OSHA, although they may follow slightly different complaint processing procedures. There are currently 23 states and jurisdictions operating OSHA-approved state occupational safety and health programs that cover both the private-sector and state and local government authorities. Three other states operate approved state plans that cover state and local government employees only. Complaints to federal OSHA from workers in states with OSHA-approved state plans will be forwarded to the appropriate state plan for response.

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Occupational Safety & Health Administration
200 Constitution Avenue, NW
Washington, DC 20210

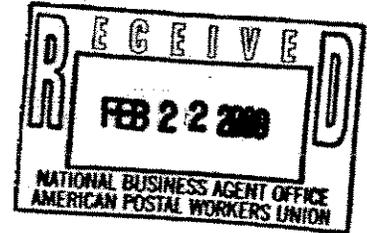
American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

February 16, 2000

To: Local Presidents
Regional Coordinators

Fr: Greg Bell, Director
Industrial Relations



Re: Joint Labor-Management Safety & Health Committees (APWU)

Enclosed you will find a copy of a joint memo signed by the parties intended to re-enforce the contractual requirement establishing safety and health committees at the area and local levels and that such committees should meet at least quarterly.

The memo was the result of discussions that took place at the National Joint Safety & Health Committee regarding the importance of ensuring that area and local committees are meeting regularly and actively working to address safety and health issues as required by the National Agreement.

We have periodically received complaints from the field regarding management's failure to have safety and health meetings. However, it should be noted that in installations with less than 50 employees the contract only encourages, rather than requires, installation heads to establish safety and health committees upon request by the Union. Where no safety and health committee exists in an installation with less than 50 employees, safety and health items may be placed on the agenda and discussed at labor-management meetings.

enclosure

cc: Resident Officers
National Business Agents

GB:jmg
opeiu#2
afl-cio

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, CAPITAL METRO OPERATIONS
DISTRICT MANAGERS
PLANT MANAGERS

AREA COORDINATORS, APWU
PRESIDENTS, APWU

SUBJECT: Joint Labor-Management Safety and Health Committees (APWU)

The National APWU/USPS Safety and Health Committee recently discussed the importance of ensuring that area and local committees are meeting regularly and actively working to address safety and health issues as required by the national agreement.

The national agreement between the APWU and USPS requires that safety and health committees be established at the area and local levels and meet at least quarterly. Joint committees have considerable potential for resolving unsafe conditions. Management, union, and employees, through their representatives, can all become actively involved in and make positive contributions to the Postal Service's safety and health program. Safety and health committees provide the parties with a valuable tool to demonstrate commitment to employee safety and health and to work cooperatively to improve safety performance.

Both the American Postal Workers Union and the Postal Service again reinforced the importance of providing a safe and healthful workplace for all postal employees when they agreed to the Correction of Unsafe Conditions MOU. Local committees should review and discuss the progress in accident prevention and elimination of unsafe conditions and recommend safety and health program areas which should have increased emphasis.

Both the area and local safety and health committees can also review the national and local history of OSHA citations for the most common violations and work together to correct potential unsafe conditions.

Local committees could also monitor and work to improve the process for handling employee reports of unsafe or unhealthful working conditions (PS Form 1767). A prompt response and resolution of reported safety hazards will significantly reduce the potential for incurring accidents or injuries. For example, egress issues, such as clearly marked aisleways, posting signs not to block aisles, exits, or fire extinguishers, could be corrected by action plans developed and implemented by local committees.

Our collective goal is to make these committees an effective tool. Accordingly, please ensure that the area and local safety and health committees have the commitment and support necessary to resolve issues effectively in accordance with the spirit and intent of our national agreement.

John E. Potter

John E. Potter
Senior Vice President
Operations
U.S. Postal Service

2/3/00
Date

Moe Biller

Moe Biller
President
American Postal Workers
Union, AFL-CIO

2/4/00
Date

**MEMORANDUM OF UNDERSTANDING
BETWEEN THE
UNITED STATES POSTAL SERVICE
AND THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO**

Re: Correction of Unsafe Conditions

The American Postal Workers Union, AFL-CIO ("APWU") and the United States Postal Service ("USPS") recognize the importance of providing a safe and healthful workplace for all postal employees. The parties acknowledge the passage of the Postal Employee Safety Enhancement Act ("PESEA") by Congress on September 29, 1998, and in concert with the provisions of PESEA, the parties agree to implement its provisions in the Postal Service by taking the following actions:

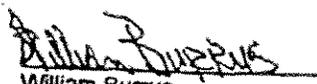
1. The parties encourage the resolution of unsafe conditions at the lowest level in the organization. In accordance with our current procedures, an employee or a union representative may identify and discuss an alleged unsafe condition with their immediate supervisor, who will investigate and take corrective action if necessary and within their authority. If unresolved, the issue will be recorded including all relevant facts and referred to the parties' designated representatives identified in Section 2 below.
2. The local parties will designate a facility union and management representative at all plants, bulk mail centers, airmail centers, the district main post office (which will also cover the stations/branches), and vehicle maintenance facilities. These representatives will meet on a regular predetermined basis to review and attempt to resolve the referred safety and health issues.
 - A. The management and union representatives should have sufficient authority and knowledge to resolve safety issues in an expeditious manner. As necessary, the parties will utilize available safety, maintenance, and other appropriate resources to develop possible resolutions.
 - B. To the extent issues are addressed on one tour in multi-tour facilities, the same issue will not be a topic for discussion on another tour as long as the issue is pending resolution with the parties' representatives.
 - C. Those offices that have an established program (e.g., Safety Captain) in which they regularly meet with union representatives to discuss safety concerns are not required to modify their existing program to conform to these procedures.
 - D. Safety issues originating in all offices not identified in Section 2 above and unresolved in discussions between the union or employee and management representatives may be processed in accordance with the regular grievance procedure.
3. If possible, management will try to immediately resolve safety issues as they are brought to its attention in the meetings described above. The parties recognize, however, that certain safety issues cannot be resolved immediately. For instance, a safety issue brought to management's attention might have national implications or would require engineering changes which facility management is incapable of resolving at the level to which the initial complaint is brought, or may require the use of outside resources to resolve. There may be

instances when it may not be possible to resolve the issue due to disagreement between the representatives over the nature of the safety issue itself, the necessary alternative resolutions, or the extent of work that needs to be performed to correct the situation. The parties' representatives may mutually agree to refer an unresolved issue to the local Safety and Health Committee.

4. The parties agree that bargaining unit employees will utilize these procedures to notify management of workplace safety issues for resolution. To this end, the union at both the national and local level will notify bargaining unit employees both verbally and through their written communications vehicles to communicate any safety matters to its representatives so they can raise and resolve them, if possible, through this procedure.
5. This Understanding and its procedures are for the purpose of further providing a safe and healthy workplace through timely recognition and resolution of safety issues and is not intended to deprive any bargaining unit employee of his/her right to notify appropriate third parties. It is the intent of this agreement to implement this process to allow employees and the union to bring safety issues to management's attention so they can be expeditiously addressed in a timely manner without invoking an administrative procedure and attendant litigation which would have a delaying effect on any resolution to the safety issue.
6. The parties agree that any issues regarding nationally deployed equipment or issues that have national implication are to be jointly forwarded by the local parties to the Vice President, Labor Relations and Director, Industrial Relations (APWU) for referral to the national Joint Labor-Management Safety Committee.
7. The parties agree to modify the language in bold print on page 80 of the 1998-2000 collective bargaining agreement as follows: Any grievance filed in accordance with Section 2. (c) above which is not resolved at Step 2 may be appealed to the local Safety and Health Committee for discussion and decision ~~or~~ may be appealed directly to arbitration within 21 days after receipt of the Employer's Step 2 decision. Any such appeal to the Safety and Health Committee must be made within fifteen (15) days after receipt of the Employer's Step 2 decision unless the parties agree to extend the time for appeal. The Committee shall meet and discuss the grievance at the next regularly scheduled Safety and Health Committee meeting. Any grievance not resolved by the committee may be appealed directly to arbitration within 21 days of the committee's review. If appealed to the regularly scheduled local safety and health committee, the parties' representatives shall be prepared to present the issue to the committee with their assessment and resolution.
8. The parties will implement this process and name representatives to begin meeting within 60 days of the signing of this agreement. This agreement and its procedure are in addition to the contractual obligations of both parties and in no way changes or alters those provisions.


John E. Potter
Senior Vice President
Operations
U.S. Postal Service

6/8/99
Date


William Burmus
Executive Vice President
American Postal Workers
Union, AFL-CIO

6/9/99
Date

August 4, 1999

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, CAPITAL METRO OPERATIONS

SUBJECT: Correction of Unsafe Conditions

This is a follow-up to the June 14 memorandum from Jack Potter informing you of the memorandum of understanding (MOU) with the American Postal Workers Union, AFL-CIO (APWU) establishing an internal process to jointly resolve unsafe conditions. This document was jointly developed by the APWU and USPS and reflects common understandings of the interpretation and application of the provisions of the MOU.

1. Item 2 of the agreement states that "the local parties (USPS and APWU) will designate a facility union representative and management representative." Does this mean one representative for both parties per facility or can there be more than one, such as one on each tour?

The agreement requires that one management and one union representative be designated for the identified facility. There is no requirement to establish teams for each tour.

2. Item 2 also identifies all plants, bulk mail centers, airport mail centers, the district main office (which will also cover the stations/branches) and vehicle maintenance facilities are required to designate union and management representatives. Northern Virginia District, for example, does not have a district main office. The largest post office in the district is Alexandria, which is an associate office. In fact, all of Northern Virginia's post offices are associate offices with their own stations and branches. Does this memo apply to them as well?

A team is to be established only for the district main post office and its stations and branches. Teams are not required for other associate offices. In associate offices unresolved safety and health issues may be processed in accordance with Article 14 of the National Agreement.

3. In Alexandria, we have a joint Safety and Health Committee with the APWU and NALC. This is a common practice in associate offices. The language in the APWU contract permits discussion of items in the grievance process, but the NALC contract does not. Should we have separate committees now or just wait to see if it is a problem. Item 2C indicates that modifications to existing programs are not required.

The agreement clearly states in Section 8, that the provisions of existing contractual obligations should in no way be changed or altered. Therefore, there would be no change to the existing membership of the joint Safety and Health Committee.

4. What defines a committee or other safety program in Section 2.C.?

An organized safety program or committee should:

- Consist of at least one postal management representative and one APWU representative
- Meet regularly to discuss safety and health problems
- Actively resolve safety and health issues

Such pre-established, active programs are not subject to modification and may continue to operate effectively under this agreement.

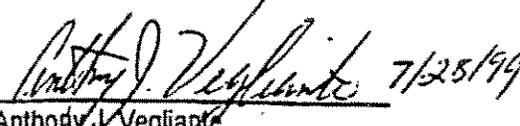
5. Does this agreement eliminate use of PS Form 1767, Report of Unsafe Condition or Hazard?

No.

6. If we have a joint labor/management Safety and Health Committee, do we also have to designate facility representatives and follow the agreement?

7. May the parties initiate a safety issue when preparing the agenda for the Safety and Health meeting?

Yes.


Anthony J. Vegliante
Vice President, Labor Relations
U.S. Postal Service


William Burrus
Executive Vice President
American Postal Workers Union, AFL-CIO

cc: Area Managers, Human Resources
District Managers
Plant Managers
Managers, Vehicle Maintenance Facilities

