

# Means of Egress Emergency Action Plan OSHA 29 CFR 1910.33-39

OSHA Checklist from Liberty Mutual Insurance

This checklist will assist you with assessing areas of risk, existing controls, and the key elements of the OSHA Emergency Action Plan standard. This standard contains requirements that must be captured in a written program and it provides an overview of those requirements. You must tailor it to meet your own specific organizational processes/operations.

When the checklist is complete, refer to your existing program or Liberty Mutual's customizable program to determine if any modifications are necessary. Also, review your related written procedures, controls (engineering, training, and behavior), safety metrics, etc., to ensure they are in alignment.

This checklist may not address all potential situations that may cause injury, property, or environmental losses.

**Company Name:**

**Location:**

**Assessment by:**

**Date:**


This safety program and accompanying information does not identify all possible hazards and we cannot be responsible on your behalf for your obligations under any law, rule or regulations. The principles contained in the material are general in scope and, to the best of our knowledge, current at the time of publication. Liberty Mutual specifically disclaims all liability for damages or personal injury alleged to arise from reliance on the information contained in this document.

OK	No	N/A	Key Elements	Assessment/Comments
			<b>Best Practices</b>	
			One key individual is responsible for overseeing the Emergency Action program who can make decisions and take action to audit and improve the program.	
			Copies of company policies and guidelines regarding the program are available at the facility that supports the various program elements.	
			Adequate communication about program requirements among facility personnel occurs.	
			Program team members receive adequate training and education about the requirements to understand the goals and policies of the site-specific program.	
			Managers, supervisors, and employees are evaluated on their support of compliance programs during personnel performance reviews.	
			<p><b>Help Note:</b> The emergency action plan should address emergencies that may reasonably be expected in the workplace. Examples include fire; toxic chemical releases, hurricanes, tornadoes, blizzards, floods, etc.</p> <p>Best practices on Emergency Action Plans can be found in:</p> <ol style="list-style-type: none"> <li>1. NFPA 1600, <i>Standard on Disaster/Emergency Management and Business Continuity Programs</i>.</li> <li>2. FEMA 141, <i>Emergency Management Guide for Business and Industry</i>.</li> <li>3. OSHA eTool: <i>Evacuation Plans and Procedures</i> (<a href="http://www.osha.gov/SLTC/etools/evacuation/index.html">http://www.osha.gov/SLTC/etools/evacuation/index.html</a>)</li> </ol>	
			<b>Emergency Action Planning Procedure</b>	
			1910.38(b) A formal written Emergency Action Plan is in place.	
			<p><b>Help Note:</b> An emergency action plan must be in writing, kept in the workplace, and be available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.</p>	
			1910.38(c) The emergency action plan includes:	
			<ul style="list-style-type: none"> <li>■ Procedures for reporting a fire or other emergency.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Procedures for emergency evacuation, including type of evacuation and exit route assignments.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Procedures to account for all employees after evacuation.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Procedures to be followed by employees performing rescue or medical duties.</li> </ul>	

			<b>Emergency Action Planning Procedure (Cont'd)</b>
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>
			<p><b>Help Note:</b> Floor plans or workplace maps that clearly show emergency escape routes should be included in the emergency action plan. Color coding will aid employees in determining their route assignments.</p> <p>The plan should also include and explain in detail which rescue and medical first aid duties are to be performed and by whom. All employees are to be told what actions they should take in the emergency situations that the employer anticipates may occur in the workplace.</p>
			<b>Emergency Alarm System</b>
			1910.38(d) An employee alarm system that uses a distinctive signal for each purpose and complies with the requirements in OSHA 29 CFR 1910.165 is installed and maintained.
			<p><b>Help Note:</b> The employee alarm shall be capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace. Tactile devices may be used to alert those employees who would not otherwise be able to recognize an audible or visual alarm.</p>
			<b>Training</b>
			1910.38(e) Employees are designated and trained to assist in the safe and orderly evacuation of other employees.
			<p><b>Help Note:</b> Ensure that an adequate number of employees are available at all times during working hours to act as evacuation wardens. 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.</p> <p>Train the employees selected as wardens about complete workplace layout and alternative escape routes from the workplace. After the desired degree of evacuation is completed, 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.</p>
			<b>Plan Review and Communication</b>
			1910.38(f) The emergency action plan is reviewed with each employee covered by the plan:
			<ul style="list-style-type: none"> <li>■ When the plan is developed or the employee is assigned initially to a job.</li> </ul>
			<ul style="list-style-type: none"> <li>■ When the employee's responsibilities under the plan change.</li> </ul>
			<ul style="list-style-type: none"> <li>■ When the plan is changed.</li> </ul>
			<p><b>Help Note:</b> A good time to communicate the Emergency Action Plan with employees is during orientation or the first few days on the job or when an employee changes jobs or responsibilities. Review the plan annually.</p>

			<b>Exit Route Design and Construction</b>
			1910.36(a) Exit routes include the following as part of design and construction:
			<ul style="list-style-type: none"> <li>Each exit route is a permanent part of the workplace.</li> </ul>
			<ul style="list-style-type: none"> <li>Construction materials used to separate an exit from other parts of the workplace are 1-hour fire resistance-rating if the exit connects three or fewer stories, and a 2-hour fire resistance-rating if the exit connects four or more stories.</li> </ul>
			<ul style="list-style-type: none"> <li>Exits 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.</li> </ul>
			<b>Help Note 1:</b> To verify exit route provisions, review the current edition of NFPA 101 Life Safety Code as another check point. Also your research should include reviewing OSHA General Industry standards 1910.34, 1910.36, and 1910.37 to determine how they impact your workplace readiness plan.
			<b>Help Note 2:</b> Each fire door, including its frame and hardware, must be listed or approved by a nationally recognized testing laboratory, per OSHA Section 1910.155(c)(3)(iv)(A). This section defines "listed" and § 1910.7 defines a "nationally recognized testing laboratory."
			<b>Number of Exit Routes</b>
			1910.36(b) Number of exit routes are as follows:
			<ul style="list-style-type: none"> <li>Two exit routes are available in the workplace to permit prompt evacuation of employees and other building occupants during an emergency, except as allowed in Help Note below. Exit routes are 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.</li> </ul>
			<ul style="list-style-type: none"> <li>More than two exit routes are available in the 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.</li> </ul>
			<b>Help Note:</b> Where possible and practical, two exit routes are always preferred. The exception, OSHA standard 1910.36(b)(3), is stated as: 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.

OK	No	N/A	Key Elements	Assessment/Comments
			<b>Exit Details</b>	
			1910.36(c-f) All exits have the following characteristics:	
			Each exit discharge leads directly outside or to a street, walkway, refuge area, public way, or open space with access to the outside, large enough to accommodate the building occupants likely to use the exit route. 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.	
			Exit doors are unlocked and able to open from the inside at all times without keys, tools, or special knowledge except as allowed in Help Note 1 below. Exit route doors must be free of any device or alarm that could restrict emergency use if the device or alarm fails.	
			Side-hinged doors are used to connect any room to an exit route and 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).	
			Exit routes support the maximum permitted occupant load for each floor served. The capacity of an exit route may not decrease in the direction of exit route travel to the exit discharge.	
			<b>Help Note 1:</b> As specified in OSHA standard 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.	
			<b>Help Note 2:</b> Information regarding "Occupant load" is located in Chapter 7 of NFPA 101-2015, Life Safety Code.	
			<b>Maintenance, Safeguards, and Operational Features for Exit Routes</b>	
			1910.37(a-e) All exit routes have the following characteristics:	
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Exit routes must be free and unobstructed. No materials or equipment may be placed either permanently or temporarily within the exit route.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ Exit routes must be kept free of explosive or highly flammable furnishings or other decorations.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ The exit access must not go through a room that can be locked, such as a bathroom, nor may it lead into a dead-end corridor.</li> </ul>	

			<b>Maintenance, Safeguards, and Operational Features for Exit Routes (Cont'd)</b>
			<ul style="list-style-type: none"> <li>■ Stairs or a ramp must be provided where the exit route is not substantially level.</li> </ul>
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>
			<ul style="list-style-type: none"> <li>■ Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route.</li> </ul>
			<ul style="list-style-type: none"> <li>■ Each exit must be clearly visible and marked by a sign reading "Exit."</li> </ul>
			<ul style="list-style-type: none"> <li>■ Each exit route door must be free of decorations or signs that obscure the visibility of the exit route door.</li> </ul>
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>
			<ul style="list-style-type: none"> <li>■ 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).</li> </ul>
			<ul style="list-style-type: none"> <li>■ 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/m<sup>2</sup>) are permitted.</li> </ul>
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>
			<ul style="list-style-type: none"> <li>■ Fire retardant paints or solutions must be renewed as often as necessary to maintain their fire retardant properties.</li> </ul>
			<ul style="list-style-type: none"> <li>■ Exit routes must be maintained during construction, repairs, or alterations.</li> </ul>

OK	No	N/A	Key Elements	Assessment/Comments
			<b>Maintenance, Safeguards, and Operational Features for Exit Routes (Cont'd)</b>	
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ 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.</li> </ul>	
			<ul style="list-style-type: none"> <li>■ 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. Examine OSHA § 1910.165 for the provisions of employee alarm system.</li> </ul>	
			<b>Help Note:</b> Information regarding "Exit Routes" is located in NFPA 101-2015, Life Safety Code.	

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