



Emergency Action Planning

For High-Hazard Jobs & Environments

OSHA 29 CFR 1910.38 | Evaluation, Implementation & Compliance



Date: _____ Presenter: _____ Location: _____

Why Emergency Action Plans Matter

OSHA Regulatory Requirement

- OSHA 29 CFR 1910.38 requires a written Emergency Action Plan for all workplaces
- High-hazard environments (confined spaces, elevated work, chemical exposure) carry elevated risk of fatality or serious injury
- Employers MUST have an EAP when OSHA standard requires one, or when environment has establish one is needed
- Plans must be kept in writing and available to all employees
- Failure to comply can result in OSHA citations and penalties up to \$16,550/violation

Minimum EAP Elements (29 CFR 1910.38(c))

1. Procedures for reporting fires and other emergencies
2. Procedures for emergency evacuation (exit routes, floor plans)
3. Procedures for employees who remain to operate critical operations before evacuating
4. Procedures to account for all employees after evacuation
5. Rescue and medical duties for assigned employees
6. Names/job titles of contacts for further EAP information

No EAP = No Compliance = Workers at Risk



EAP Evaluation Process

How to Evaluate Your Emergency Action Plan

- Conduct a site-specific hazard assessment for each high-hazard task
- Identify all potential emergency scenarios (fire, chemical release, structural collapse, medical emergency, severe weather)
- Review historical incident data and near-miss reports
- Assess current evacuation routes for adequacy and accessibility
- Verify alarm systems are audible/visible in all work areas
- Confirm designated assembly points are at safe distances

Review Frequency & Triggers

- Review the EAP at least annually per OSHA best practice
- Update immediately when:
 - New hazards are introduced (chemicals, equipment, processes)
 - Facility layout changes (new exits, blocked routes)
 - After any actual emergency or drill reveals gaps
 - Personnel changes affect designated roles
- Document all reviews with date, reviewer, and findings

29 CFR 1910.38(b): Review plan with each new employee



Implementation & Compliance

Implementing the EAP in High-Hazard Environments

- Assign an EAP coordinator responsible for plan maintenance and drills
- Train ALL employees on the plan upon hire and when plan changes (29 CFR 1910.38(e))
- Conduct evacuation drills at least annually; quarterly for high-hazard sites
- Post evacuation maps at all exits and high-traffic areas
- Establish a clear chain of command for emergency decisions
- Coordinate with local fire/EMS for site-specific response protocols
- Ensure contractors and temporary workers receive EAP orientation

Key Takeaways for Supervisors

- You are the first line of compliance - know your EAP inside and out
- Document training attendance and drill participation
- Report gaps immediately; do not wait for the annual review
- OSHA can cite per-employee for training failures
- A strong EAP saves lives and protects the organization

Compliance = Preparedness = Lives Saved

