



National Grain and Feed Association

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NGFA Safety Tips: Emergency Action Plan

...Committed to promoting safety and health in the workplace...

The Importance of Preparedness

OSHA's *grain handling facilities standard* [29 CFR 1910.272](#) (d) requires grain, feed and processing facilities to develop and implement an Emergency Action Plan (EAP) to meet the requirements contained in the agency's *EAP standard* [29 CFR 1910.38](#). An EAP is designed to facilitate and organize the actions taken by an employer or employee during workplace emergencies. A well-developed EAP, combined with proper employee training that explains the roles and responsibilities specified within the plan, can help minimize employee injuries and structural facility damage that otherwise could occur during an emergency event.

EAPs are to be written, kept in the workplace and available for review by employees. An exception applies to employers with 10 or fewer employees, in which case employers are not required to have a written plan and may communicate the plan orally to their staff. The EAP at a grain, feed or processing facility should address situations that have the potential to occur on the workplace site. Such situations could include, but are not limited to, inclement weather, fire, explosion, derailment, electrocution, violence in the workplace and biological/terroristic threats.

Minimum Requirements of an EAP

To meet OSHA requirements, the EAP at a minimum is to include procedures for:

- Reporting a fire or other emergency.
- Emergency evacuation, including types of evacuations and exit route assignments.
- Designated employees who are to remain to perform critical plant operations before evacuating.
- Accounting of all employees, customers and visitors.
- Employees performing rescue and medical duties.

NOTE: *It also is good practice to provide a list of names with job titles of other company employees who may need to be contacted by those executing the emergency plan. These individuals are typically upper supervisory or management personnel who can provide those implementing the EAP with further details of their positional duties and responsibilities, and further steps to be taken within the plan.*

Employee Alarm Systems

An employer must have and maintain an alarm system(s) that has a distinct signal for each purpose addressed in the plan. Situations that might require a different tone or rhythm of alarm under and EAP include:

- Severe weather.
- Fire and/or Explosion.
- Violence in the workplace.

NGFA Safety Program

- The NGFA is committed to promoting safety and health in the workplace, and shares the Occupational Safety and Health Administration's (OSHA's) commitment to protecting employees.
- The NGFA's extensive efforts to enhance safety include unprecedented research and education efforts launched in the early 1980s that helped lead to a dramatic reduction in the number of fire and explosion incidents in commercial grain-handling facilities.
- Each year, NGFA jointly sponsors regional safety seminars with affiliated state and regional grain and feed associations. The one-day conferences focus on keeping grain handling employees physically safe.

These alarms should be kept independent of operational or system alarms, such as those that may denote plugged equipment, conveyance slowdowns, temperature differentials or dryer notifications.

Training

An employer is required to designate and train employees to assist in safe and orderly evacuation of other employees and those who perform critical plant procedures before evacuating themselves.

Review of the Emergency Action Plan

An employer is required to review the EAP annually and with each employee covered by the plan when:

- The plan is developed, or the employee initially is assigned to a job.
- The employee's job responsibilities or the plan changes.

Best Practices

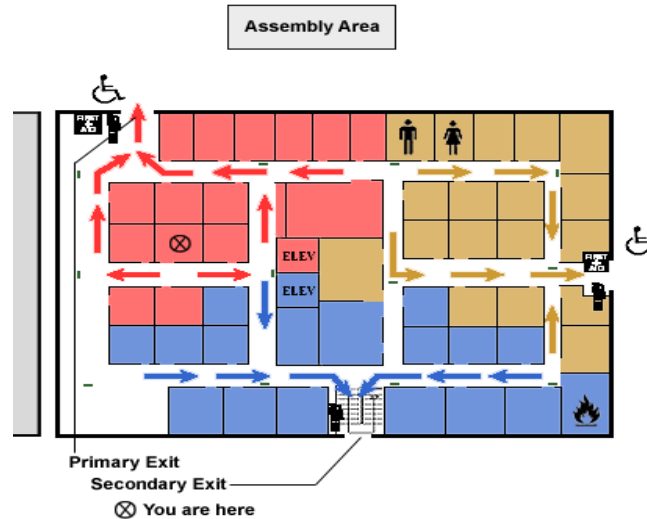
- Be familiar with OSHA's EAP regulations.
- Invite local first-responder agencies to the facility to discuss the EAP.
- Provide first responders with maps and egress routes of the facility.
- Consult with safety and regulatory specialists when designing new facilities and/or facility upgrades concerning appropriate locations and types of egress.
- Conduct and document appropriate EAP training with employees.
- Conduct and document annual EAP exercises and make plan improvements as necessary.

Disclaimer: The National Grain and Feed Association make no warranties, expressed or implied, concerning the accuracy, application or use of the information contained in this publication. Further, nothing contained herein is intended as legal notice. Competent legal counsel should be consulted on legal issues. Grain handling facilities should contact experienced safety and health legal counsel or a third-party expert if they have questions about the proper way to implement the items addressed in the document.

More safety information at www.ngfa.org

Contact VP for Safety and Regulatory Affairs Jess McCluer or Manager of Safety Education and Training Jim Seibert at 202-289-0873

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NGFA Reference Corner

OSHA's Laws & Regulations (Standard 29 CFR) 1910.38 Subpart E – Emergency Action Plans

[CLICK HERE](#)

OSHA's eTools, Evacuation Plans and Procedures

[CLICK HERE](#)

Develop and Implement an Emergency Action Plan (EAP) > Emergency Action Plan Checklist

[CLICK HERE](#)