



**VOSH PROGRAM DIRECTIVE: 02-013**

**ISSUED: April 1, 2003**

**SUBJECT: Compliance Policy for Emergency Action Plans and Fire Prevention Plans**

**A. Purpose.**

This directive transmits to field personnel a consolidated compliance policy for the application of emergency action plans (EAPs) and fire prevention plans (FPPs) for General Industry Standard, Part 1910.38.

*This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.*

**B. Scope.**

This directive applies to all VOSH personnel.

**C. Reference.**

OSHA Instruction CPL 2-1.037 (July 9, 2002).

**D. Cancellation.**

Pages F-2 and F-3 of Appendix F, (Relationship of 29 CFR 1910.120(a) with Other OSHA Standards and Other Agency Regulations) of VOSH Program Directive 02-073A, Inspection Procedures for the Hazardous Waste Operations and Emergency Response Standard, §§ 1910.120 and 1926.65, Paragraph (q): Emergency Response to Hazardous Substance Releases (12/15/98).

**E. Action.**

The Directors and Managers shall assure that the guidelines in this Directive are followed.

**F. Effective Date.**

April 1, 2003.

C. Ray Davenport  
Commissioner

Attachment (non e-copy): OSHA Instruction CPL 2-1.037 (July 9, 2002) or refer to:

[http://www.osha.gov/OshDoc/Directive\\_pdf/CPL\\_2-1\\_037.pdf](http://www.osha.gov/OshDoc/Directive_pdf/CPL_2-1_037.pdf)

Distribution: Commissioner of Labor and Industry  
Directors and Managers  
VOSH Compliance Staff  
Cooperative Programs Staff  
Legal Support Staff  
OSHA Regional Administrator, Region III  
OSHA Area Office, Norfolk

When the guidelines, as set forth in this Program Directive, are applied to the Commissioner of the Department of Labor and Industry and/or to Virginia employers, the following federal terms if, and where they are used, shall be considered to read as below:

Federal Terms

VOSH Equivalent

29 CFR

VOSH Standard

Regional Administrator

Commissioner of Labor and Industry

Area Director

Region Director

Regional Solicitor

Attorney General or  
VOSH Office of Legal Support (OLS)

Agency

Department

Office of Statistics

VOSH Research and Analysis

Compliance Safety and Health Officer (CSHO)  
and/or Industrial Hygienist

CSHO

Field Inspection Reference Manual (FIRM)

VOSH Field Operations Manual (FOM)