



Electronic Access/Egress & Electromagnetically Locking Door Failures



Public Employee Alert #34 Safety & Health Bulletin **ATTENTION: All Employers** *August 2021*

This Safety Alert is being sent in response to the potential for injuries and/or death to occur due to the failure of existing or future installation of electronic access and egress control systems and/or electromagnetically locked egress doors.

**PLEASE ENSURE THAT THIS INFORMATION IS SHARED WITH ALL
APPROPRIATE PERSONNEL**

In order to prevent employee entrapment during an emergency evacuation or power failure, employers are required to comply with the provisions of the New Jersey Public Employees' Occupational Safety and Health (PEOSH) Act and 29 CFR 1910 Occupational Safety and Health General Industry Standards, specifically:

- 29 CFR 1910 Subpart E – Exit Routes and Emergency Planning.
 - 1910.33 - Table of contents.
 - 1910.34 - Coverage and definitions.
 - 1910.35 - Compliance with alternate exit-route codes.
 - 1910.36 - Design and construction requirements for exit routes.
 - 1910.37 - Maintenance, safeguards, and operational features for exit routes.
 - 1910.38 - Emergency action plans.
 - 1910.39 - Fire prevention plans.
- When an employer decides to install the use of electronic access and egress control systems and/or devices that are capable of electromagnetically locking egress doors, the employer shall maintain the operational features for exit routes in order to safeguard against failure of the equipment in place to ensure the prevention of employee entrapment during a power outage.
- The employer shall also comply with the New Jersey Uniform Construction Code at the time of installation and the manufacturers specifications.
- Further, all means of egress devices and safeguards required by the New Jersey Uniform Fire Code or any other statute or code when the structure was constructed, altered or repaired shall be maintained in good working order in accordance with manufacturers specifications.
- The employer shall perform a hazard assessment of the facility to determine that the equipment in place will operate per its designed operational function at all times including during a facility wide loss of power or an emergency alarm activation.
- The employer shall establish a preventative maintenance program designed to maintain the performance and safety of the equipment at the facility. Moreover, the planned maintenance of equipment will help extend equipment life and avoid any unplanned maintenance activity or failures during a power outage or an emergency alarm activation.
- In accordance with N.J.S.A. 34:6A-49, “Whenever an action taken to comply with the provisions of this act makes it necessary for a property owner or employer to obtain a permit(s) pursuant to the State Uniform Construction Code, the owner or employer shall obtain the permit(s) from the enforcing agency having jurisdiction. The commissioner shall inform any owner or employer who is required to take an action in order to be in compliance. It is the responsibility of the owner or employer to contact the agency having jurisdiction to determine whether a permit(s) is required and to obtain any required permit(s).”

NJ Public Employers must report all work-related fatalities to PEOSH within eight (8) hours as well as all work-related in-patient hospitalizations, amputations, and losses of an eye to PEOSH within twenty-four (24) hours.

In the event that the individual responsible for reporting is not sure whether the incident is work-related or not, a report is to be made.

The oral report shall be made directly to (800) 624-1644.

Any employer who willfully or repeatedly violates the requirements of the Public Employees Occupational Safety and Health Act shall be assessed a civil administrative penalty of up to \$70,000 for each violation pursuant to N.J.S.A. 34:6A-41(d).

For additional information about the Public Employees Occupational Safety & Health Act contact:

**NJ Department of Labor & Workforce Development
Office of PEOSH
P.O. Box 386
Trenton, NJ 08625-0386
(800) 624-1644
Fax: (609) 292-3749
http://lwd.dol.state.nj.us/labor/lsse/employer/Public_Employees_OSH.html**

**NJ Department of Health
PEOSH Program
P.O. Box 360
Trenton, NJ 08625-0360
(609) 984-1863
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<http://www.state.nj.us/health/peosh/index.shtm>**