



More Than May Flowers: The Correct Plan and Training Can Save Lives

April showers bring more than just May flowers; they also bring severe weather. This time of year serves as a reminder of the six workers who lost their lives in the EF3 tornado that struck an Amazon warehouse in Edwardsville in 2021. In response to this tragedy, the state established a Warehouse Safety Task Force ¹ to investigate the root causes of the workers' deaths and to recommend measures to prevent future incidents. Federal OSHA also conducted an inspection for the incident and issued Hazard Alert Letters to Amazon and three staffing companies involved.

As a result of the task force's findings, Illinois House Bill 2987, known as the Warehouse Tornado Preparedness Act ², was signed into law in August 2025. This law (240 ILCS 45) outlines specific requirements that warehouse owners and operators must implement to protect employees during tornadoes and other severe weather events. These requirements include developing a written, site-specific tornado plan, providing training, and constructing designated refuge areas. The provisions of this act align with OSHA's Exit Routes and Emergency Planning standard (1910.39). While the act focuses specifically on warehouse facilities, an Emergency Action Plan (EAP) is mandatory for all employers required by local codes to have fire extinguishers on site, in accordance with standard 1910.157.

The Warehouse Tornado Preparedness Act requires a written, site-specific plan. OSHA's EAP template³ is a helpful starting point, but it must be tailored to each site or establishment. The plan must include a floor layout that highlights refuge zones, assembly areas, and emergency exits. A copy should be kept in each refuge zone and must contain a written description of the actions employees should take to communicate with first responders and perform basic first aid. OSHA's EAP also requires procedures to account for all employees and to provide ways for employees to report and be notified of emergency conditions.

In addition to being reviewed and updated annually or whenever conditions change—such as building additions, modified exit routes, or operational procedures—the plan must also be filed with local emergency management officials each year. The Illinois Emergency Management Agency (IEMA) offers a list of these officials⁴, or you can contact your local fire department.

Both the Warehouse Tornado Preparedness Act and OSHA's EAP require that all employees be protected, irrespective of their status. This includes temporary, contractual, or subcontracted workers—all individuals working inside the facility must be accounted for in the planning and protective measures. While the act does not specify training requirements, OSHA's EAP does. Every employee affected or protected under the EAP must be trained on the plan, and participation in training and drills must be documented.



New warehouse construction must adhere to tornado-resistant building standards; however, existing warehouses are not required to modify their layouts or designs for improved refuge zone protection. The act allows engineers and architects to use a risk-targeted approach to determine the minimum requirements, with the Federal Emergency Management Agency's (FEMA) standard P-431⁵ highlighted as an acceptable option.

The Warehouse Safety Task Force and OSHA found that neither Amazon nor the other contractors at the Edwardsville facilities violated any state or federal safety standards, yet tragically, six employees died in the tornado, which underscores that OSHA standards are the minimum safety measures. Like OSHA, the Warehouse Tornado Preparedness Act offers the minimum protection, and employers should aim for better.

As an employer charged with the safety of your employees, the Illinois On-Site Safety and Health Consultation Program can review your business EAP and find ways to improve it. This program, offered at no cost by the State of Illinois, can provide the support and guidance needed to identify hazards, develop a hierarchy of controls, and establish a lasting safety and health program. Consulting services include on-site visits, air sampling, program assistance, and training, all of which can help create a safer, healthier workplace and possibly reduce workers' compensation insurance costs. Visit <https://worksafe.illinois.gov/> or contact Harry (Hap) Hileman with the Illinois Department of Labor at 217-993-2111 for more information.



* The 21(d) On-Site Consultation Cooperative Agreement is funded by a federal grant, constituting ninety percent of the overall budget. State funds finance ten percent.

1. <https://labor.illinois.gov/about/reports.html>
2. <https://my.ilga.gov/Legislation/ILCS/Articles?ActID=4624&ChapterID=27&Chapter=WAREHOUSES&MajorTopic=REGULATION&Print=True>
3. <https://www.osha.gov/etools/evacuation-plans-procedures/expert-systems/create-eap/plan>
4. <https://iemaohs.illinois.gov/content/dam/soi/en/web/iemaohs/contacts/documents/localemadirectory.pdf>
5. https://www.fema.gov/sites/default/files/documents/fema_barra-new-checklist_10-4-2017.pdf