Office of Compliance

112th Congressional Biennial Inspections Risk Based Approach Talking Points February 15, 2011

- **Intended Inspection Focus Areas**
  - Newly Completed Construction or Renovations including:
    - Examples: Book Modules 3 and 4, Fort Meade; Botanic Gardens Admin Facility; Any additional facilities that are completed and occupied during the 112th Congress
  - Higher Risk Areas and Areas of Special Interest – see examples on Attachment A
    - We will be discussing how this looks specifically for each facility during opening conferences.
    - Areas of Special Interest are listed on Att. A, page 2. These are areas that are highly visible, may have a vulnerable population or have special interest for our stakeholders.
      - Examples include: Day Care Centers, Member Offices, Page Dorms and Schools
  - Repeat RAC 1 and RAC 2 Findings
    - All areas with repeat RAC 1 and RAC 2 findings will be inspected.
  - **Fire and Life Issues Continue to be a Priority**

- **What Does this Mean to You?**
  - Strategically Focused Inspection Process
    - All facilities inspected, we are concentrating on higher risk areas within facilities.
    - The inspection process will be the same as in the past with the addition of seeing how employees are working within those areas.
  - Self-Inspection Process Implemented
    - We are requesting that Employing Offices self-inspect (in place of pre-inspections) the lower risk spaces that we will not be entering.
      - Examples of these areas: hallways, office and administrative spaces
      - We will be requesting lists of areas inspected, certification of inspections and summary data.
      - We plan to conduct spot checks of areas showing anomalies during inspections of facilities. Early in the Congress we may not have the self-inspection information and may need to re-visit facilities later in the Congress. We will do our best to minimize multiple visits.

- **What will the inspection look like?**

  - Similarities to previous biennial inspections
    - Same Findings Reports
    - Same Process for Scheduling
    - Same Need for Access
    - Same Standard Compliance Basis
    - Scheduled Opening and Closing Conferences
  - Potential for increased activity in the following areas:
    - Interviews of Employees
    - Information Requests
    - Opportunity for Employee Representation through Unions

  - Differences from past inspections
    - This will be an operational review. Please do not stop work.
    - Programs, procedures and written document review will be included this Congress.
    - Safety programs of interest will be targeted for program review. See details below.

- **Safety Programs of Interest**

  Our intent is to make this inspection process very similar to 111th Congress technical assistance process for programs.

  - Hazard Communication – 29 CFR 1910. 1200 for all areas except laboratories.
  - Occupational Exposure to Hazardous Chemicals in Laboratories 29 CFR 1910.1450 will be used where applicable.
  - Personal Protective Equipment – 29 CFR 1910.132
  - Others may be added based on biennial inspection findings and ongoing dialogue with employing offices.
  - One finding per program with sub-tasks identifying specific items not meeting standard requirements.
    - Example: Each shop or area that is required to have a Hazard Communication Program will need to have its program available for our review. The program is required to be specific to the hazards in the area it applies. The program for each area will be reviewed and one finding issued with sub-tasks for any program that does not comply with the OSHA standard. A sample of a program finding is attached.
  - Every effort will be made to perform program review inspection elements during scheduled facility visits. Employing Office cooperation is key to our performing this function in conjunction with the on-site inspection. We will be requesting programs prior to our opening conferences in order to have time to review them and be prepared to conduct our on-site review and interviews of affected employees.

- **Special Emphasis on Risky Occupations**
  - Capitol Grounds Landscaping Division has been chosen for this and we will work in coordination with the AOC in planning this phase.
    - We are planning two seasonal visits – Spring/Summer and Winter
    - Area specific documents will be requested: We will be working with the AOC to obtain job hazard analyses or job descriptions in order to determine what operations and occupations will be observed.
    - We will hold opening and closing conferences.
- **Ongoing Initiatives**
  - ADA Access – as covered in separate presentation by John Uelmen.
  - Safe Office Awards for Member Offices (not including Committee spaces)

Please see the attached documents for further details on the higher risk area examples, areas of special interest are included on that list. These are the areas we will be inspecting.

Please see the attached sample program finding. This depicts a sample of what the finding will look like that arises out of our "Safety Programs of Interest" review.

Please contact Terry Wigfall at 202-724-9232 or at twig@loc.gov ; David Young at 202-724-9266 or dayo@loc.gov; or Faith Perry at 201-724-9294 or fperry@loc.gov for questions or clarification needed during the 112th Congress inspection period. Thank you.

Attachment A

EXAMPLES OF HIGHER RISK AREAS FOR 112th BIENNIAL INSPECTION

February 7, 2011

Air Compressors
Air Handlers (With AC Filters and Fan Units)
Ammunition and Explosive Material Storage
Armory
Auditoriums and Theaters
Balers
Baghouse
Battery Banks, Battery Back Up or Recharging Areas
Boiler Equipment and Boiler rooms
Book Conveyor Equipment
Cable TV Equipment
Cafeteria, Canteens, Carryout's, Coffee Shops, Sandwich Shops, Food Preparation and Processing Areas
Chilled and Hot Water Systems
Coal Conveying Equipment
Communication Centers
Compactors
Compressed Gas Storage Areas (Including cylinders and pressure vessels)
Confined Spaces / Permit Required Confined Space
Cooling Tower
Dust Collection Systems
Elevator Machine Rooms (Including Freight Elevators)
Emergency Generators
Fire Alarm Panels
Fire Pump Rooms
Fire Suppression Systems Including FM 200 and Novec 1230 Systems
Firing Range
Fixed Pressure Vessel Tanks
Gunsmith Shop
Hazardous Chemical Storage, Tanks and Pesticide Storage
High Voltage Rooms
Hot Water Tanks
Hub Rooms (Communications)
Laboratories
Loading Docks
Mail Handling Facility
Mechanical Spaces
Motor Control Centers (MCC)
Panel Boards (Located in all areas identified as High Risk or Areas of Interest)
Parts Cleaning Equipment Areas
Pits (Examples: fountains, pumps)
Pools and Pump Rooms
Powered Industrial truck areas and vehicles
Refrigeration Systems
Refueling Stations
Sewer Injection Systems

Attachment A

SHOPS:

- Air Conditioning
- Automotive and Truck Repair
- Cabinet
- Carpentry
- Carpet
- Clock
- Drapery
- Electric
- Elevator
- Equipment Repair
- Fire Alarm
- Furniture
- Glass
- Grounds Maintenance
- Gunsmith Shop
- High Voltage
- Key
- Light Fixtures
- Machine including metal working
- Marble
- Masonry
- Meter
- Paint
- Pipe Fitting
- Plumbing
- Printing and Binding
- Sheet Metal
- Subway
- Upholstery
- Vehicle Repair (Non Automotive)
- Welding

Shredders
Shooting Range
Steam Piping Systems
Steam Stations
Sub-Stations
Switchgears Rooms
Transformer / Transformer Vaults (located inside of buildings)
Trash Compactors

AREAS OF SPECIAL INTEREST:

- All Day Care Centers
- Members Offices
- House Page Dorm and School
- Senate Page Dorm and School

This Document May Contain Security Sensitive Material – Please Handle Accordingly
Office of Compliance
Office of the General Counsel

Finding ID
O132140

PROGRAM ABATEMENT PLAN	Prepared by: H. Woodcock	Last Update: 1/19/2011	Completed:

Location:	Facility	Status:	Open	Complete by:
Area:	Facility-wide	Observed:		
Organization:	Responsible Office	Abate by:		
		Next insp:		

Finding Description

A Hazard Communication Program has been implemented for the Facility, but the program is not fully compliant.

Reference: 29 CFR §1910.1200

Risk Assessment	RAC: 3	Severity: II	Probability: C

Corrective Actions

TASK	Act. End
1. The Facility must either label process containers with the appropriate hazard warnings or include the appropriate hazard warnings in signs, placards, process sheets, batch tickets, operating procedures, or other written materials that are readily accessible to employees, as required in 29 CFR §1910.1200(f)(5). Although the written program covered labeling as required in 29 CFR §1910.1200(e)(1), it should be revised to include labeling of stationary process containers. 2. The Facility must make sure all portable "transfer containers" are labeled as required in 29 CFR §1910.1200(f)(7). • The written program appropriately covered the labeling of transfer containers. All of these containers were found to be labeled except the small bottles used to apply product.	

Abatement Verified by:_____ On: ___ / ___ / ___

Comments:

Good Practice Recommendations

GP1. The Facility should establish a process to ensure contractors remove all of their chemicals used either at the end of the workday or upon completion of their work.

- A large number of containers of chemicals were found that had been left behind after the departure of contractors that require the Facility to store them appropriately and arrange for disposal at a cost to the Responsible Office.

Explanatory Notes

Note 1. The Responsible Office records included "objective data" for the initial determination of exposure to lead during soldering. The 700°F maximum temperature of the tip of the soldering iron tip was compared with the 900°F minimum temperature needed to cause lead to produce fumes.

Note 2. According to the interview information, an item, " was received from a source that routinely ships product to the Facility from the location. Because he was interested in expediting the shipping, the person who sent the item had arranged for a different shipper than those previously used. The shipping firm was qualified to ship the product and packed it properly, but the container was not labeled as required. The leader explained that, since the time of this incident, he has provided feedback to the shipper to ensure this problem does not recur.