

The Capitol Power Plant

Summary

The OOC conducted a comprehensive inspection of the U.S. Capitol Power Plant (CPP) during the 111th Congress. The facility provides steam for heating and chilled water for cooling Capitol Hill buildings, but does not produce electrical energy for the Capitol campus. The CPP includes the Administration Building; the newly expanded West Refrigeration Plant (the East Refrigeration plant is being removed from service); the Boiler Building, which houses boilers, a bag house, storage areas, shops, a communication center and two smoke stacks; an ash collection building; three office trailers; two cooling towers; a coal yard including off-loading facilities for rail cars and an underground oil storage tank; a coal conveyor tunnel; a Hazmat storage shed; an emergency generator shed; the Blue Storage Building; Load Center One Building; several contractor trailers; two US Capitol Police kiosks; and the transfer building.

111th Congressional Inspection Findings

The OOC identified 184 hazards in the CPP, including 27 found in steam stations inside buildings connected to the utility tunnels. Steam stations for the House buildings were not inspected because of scheduling

difficulties. Pursuant to the Settlement Agreement between the OOC and the AOC, a private contractor conducted quarterly audits of the utility tunnels; accordingly, the OOC did not inspect those areas, and any hazards found there are not included in this report. The 184 hazards discovered for the 111th

Congress represent a decrease of 19% since the 110th Congress. See Figure 1. It should be noted, however, that the OOC issued a single general finding to cover the many instances of lockout/tagout hazards identified throughout the plant. The same approach was taken concerning the incorrect installation of fire door latching devices, as discussed later in this report, and for heat stress issues.

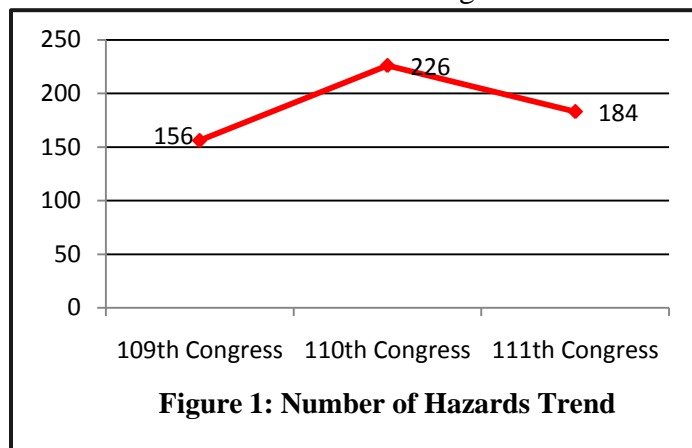
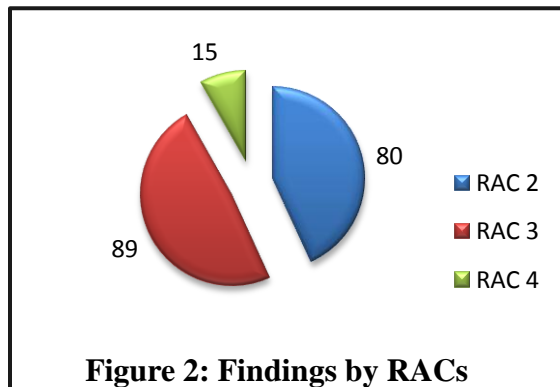


Figure 2 shows the findings broken down by Risk Assessment Codes (RACs). Figure 3 shows the breakdown of findings by the types of hazards found. RAC 2 findings decreased by 22% between the 110th and 111th Congressional inspections, falling from 102 to 80. RAC 3 findings remained about the same, while RAC 4 findings dropped from 24 to 15, a reduction of 38%.



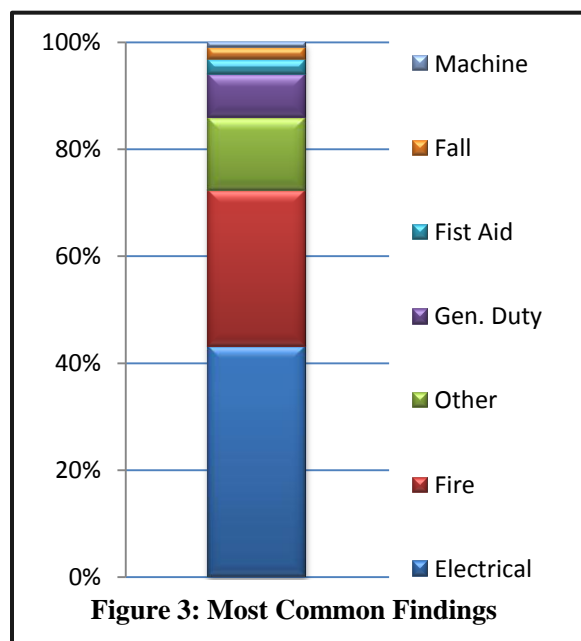
Out of the 184 total CPP findings, 94 (51%) were electrical hazards, fewer than in the 110th Congress but roughly the same on a percentage basis.

Thirty-five findings (44%) of the electrical hazards

were classified as RAC 2. Fire hazards represented 28% of the total findings, and first aid deficiencies made up 3% of the total. The remaining 40 CPP findings included hazards involving lockout/tagout, boiler and pressure vessel safety, fall protection, General Duty Clause hazards, tripping hazards, hazards associated with fork truck operations and problems with battery charging areas. Inspections inside steam stations found problems with corroded piping and valve systems, ripped asbestos lagging, and no documentation as to whether pressure relief valves were being adequately tested.

Electrical Hazards

While 94 findings in the most recent inspection is a significant decrease from the 119 electrical findings found in the 110th biennial inspection, the number still remains high. OOC inspectors found that at least six large energized portable electrical fans were missing their ground plugs, a hazard readily detected by anyone moving these fans.



Picture 1: Back Electrical Cover Missing On Control Panel

to contact energized components inside the panel box.

The inspectors noted ground fault circuit interrupters (GFCIs) missing from two electrical outlets near sinks in the basement of the Boiler Building. A GFCI on the first floor of the building was broken and would not trip. Inside a restroom near a sink, a GFCI was found loose in its bracket. Further problems with electrical cords were also noted. See Picture 2.

Lockout/Tagout:

A significant number of electrical and mechanical

Twenty-two electrical panel covers were discovered to be missing from electrical junction boxes leaving wires exposed that could cause electrical shock. See Picture 1. A number of electrical panels had incomplete or missing directories for the individual circuit breaker service. This has the potential to expose employees to hazards and may lead to serious injury if the wrong circuit is deactivated or locked out during maintenance or repair of equipment. Several electrical panels had missing or broken latches, leaving the internal mechanisms exposed to potentially corrosive dust. There were also several panels without a dead front, which could permit employees inadvertently



Picture 2: Electric Cord Pulled Away From Mounting

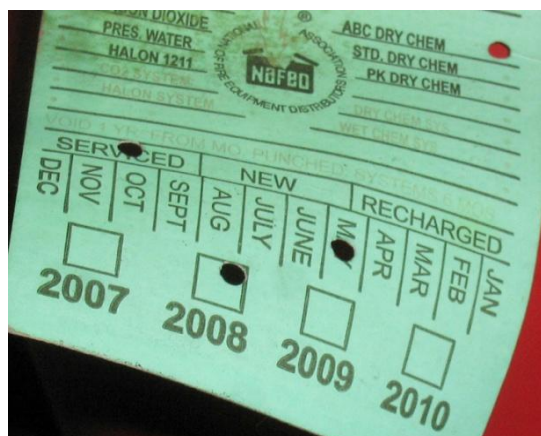
Lockout/Tagout deficiencies were observed during the inspection. The Power Plant does not appear to have implemented a comprehensive Lockout/Tagout program that complies with OSHA standards. This hazard was observed during the 110th Congress biennial inspection. During the 111th Congress inspection, the inspectors recorded these hazards as one general finding that an adequate program had not been implemented. This hazard puts employees at risk of injury from electrical, mechanical, thermal or stored energy including high voltage equipment. If these energy sources are not neutralized or controlled, equipment could accidentally start up during maintenance or repair, causing fatality, amputation or other serious injury. An unplanned startup could also damage CPP equipment or property. See Picture 3.



Picture 3: Valve Needs To Be Locked Out, Not Just Tagged

Fire Safety Hazards

The inspection team identified 29 fire safety hazards during the 111th Congress inspection, a decrease from the 52 recorded during the 110th inspection. The hazards included a single general finding regarding fire doors that failed to close and latch fully. The inspectors noted multiple doors in the west refrigeration plant on which improper hardware had been installed. In addition, one fire door had a deadbolt lock that was used after hours. The conditions of these doors compromise the ability of employees to exit promptly in the event of an emergency.



Picture 4: Tag On Portable Fire Extinguisher Indicates Last Inspection in 2008

The inspectors found six locations where fire wall openings would allow the penetration of smoke and toxic gases into an adjacent fire zone during a fire. Five instances of unsafe electrical space heaters were discovered. Four instances were recorded where lighting cables were not reconnected to the ground cables after work had been completed in those areas. Portable fire extinguishers were discovered that had not been inspected in over two years. See Picture 4.

Heat Stress Conditions

The 111th Congress inspection was conducted in July 2010. OOC inspectors took note of work areas within the Boiler Building where temperatures and humidity were high. While the Boiler Building does have an air-conditioned lounge that is open 24 hours a day, the plant does not have a heat stress management program. Six measurements of the wet-bulb globe temperature were taken inside the Boiler Building. All 6 measurements exceeded the action limit published by the American Conference of Governmental Industrial Hygienists. Three of the measurements exceeded the maximum level for any work duration.

Steam Stations

Each building serviced by the CPP has a vault or room known as a steam station where high pressure steam is reduced to a lower pressure and distributed throughout the building. The inspectors found a number of hazards in these areas, including friable asbestos lagging, a failure to test pressure relief valves, and potential weakness in steam lines due to corrosion. See Picture 5.

Hazard Communication

During the inspection, CPP representatives displayed an inventory of all chemicals in the facility, which is updated monthly. They also demonstrated a computerized system of material safety data sheets (MSDS). Most employees at the facility had received recent Hazard Communication training, including how to use the computerized system. The list of chemicals includes information concerning toxicity and appropriate handling procedures. Chemicals found to have special requirements, such as methylene chloride, are investigated to determine whether less toxic materials could be used instead. The inventory also includes chemicals maintained by organizations with employees working in the steam distribution tunnels.

Substantial Improvements

The Power Plant has made significant strides in worker protection during the past few years. For example, safety representatives recently finished an occupational health survey during which chemical exposure measurements were taken and evaluated for appropriate action. The plant has continued its noise control and hearing conservation programs. Further, CPP officials are continuing to develop a functional emergency action and response plans and a comprehensive lockout/tagout program. These are all positive developments.



Picture 5: Cloth Pipe Lagging Covers Are Ripped Open Exposing Friable Asbestos Insulation

The Capitol Visitor Center

Summary

The U.S. Capitol Visitor Center (CVC) is the newest addition to this historic complex. At nearly 580,000 square feet, the CVC is the largest project in the Capitol's more than two-century history and is approximately three quarters the size of the Capitol itself. The entire facility is located underground on the east side of the Capitol so as not to detract from the appearance of the Capitol and the grounds designed by Frederick Law Olmsted in 1874. The CVC is divided into three main areas: the north section provides space to the Senate, the south portion provides space to the House of Representatives and the center portion is open to visitors. The CVC's footprint encompasses 170,000 square feet of new building space for the House and Senate. The CVC public area has two orientation theaters, each of which seats roughly 250 people, and a restaurant that can serve over 400 people. Two small theaters in the Exhibition Hall can seat another 40 people each. Another part of this space is reserved for the use of Members of Congress and their guests and includes two large meeting rooms and the Congressional Auditorium, which seats some 450 people. The CVC was opened to the public in December 2008. The first biennial inspection of the CVC was conducted in January 2010.

111th Congress Inspection Findings for the Capitol Visitor Center

During the 111th Congressional inspection, the OOC observed 74 hazard findings. Figure 1 shows the inspection findings broken down by RACs. No RAC 1 findings were observed. Thirty-seven RAC 2 findings were observed. Sixty-four of the findings were assigned to the AOC to address.

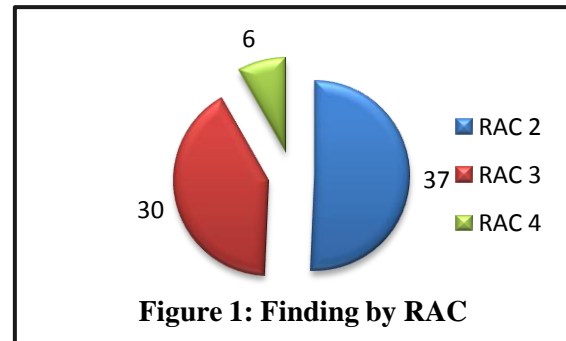
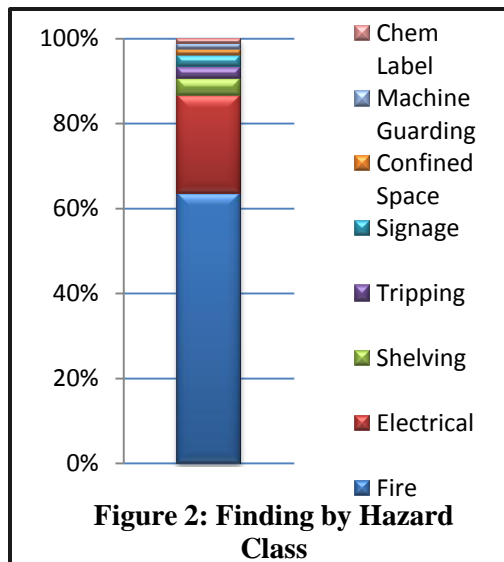


Figure 2 shows the breakdown of findings by hazard classifications. Fire hazards accounted for 64% of the findings, including the bulk of the 37 RAC 2 findings. 20 fire hazards (42% of the total) involved fire doors that failed to close or latch properly. The team found a number of



confined spaces that lacked required warning signs. However, AOC indicated the areas will be evaluated and signs installed by the end of 2011. Four instances were found where space heaters lacked a protective tip-over switch. Only one instance was found for inadequate machine guarding and one instance was found for an unlabeled hazardous chemical container. Picture 1 displays a connector pin protruding from a newly installed handrail. This pin could easily injure a person's fingers. After inspectors brought this problem to the AOC's attention, contractors quickly sawed off the pin and made the surface smooth.

Picture 2 displays a fire door with tape covering the latching mechanism, which could prevent the door from latching in a fire emergency. Fire doors must

close and latch by themselves in an emergency so that fire, smoke and other toxic gases do not easily move into other fire zones. Picture 3 is a push-to-talk device in a stairwell so that building occupants can easily contact the U.S. Capitol Police in an emergency if they need assistance. This device is well-marked and readily accessible to Members, staff and visitors alike. Picture 3 is an excellent example of a system that meets OSHA and fire code requirements.



Picture 1: Brass Connector Pin Protruding From Handrail



Picture 2: Fire Door Latch is Taped Open



Picture 3: Excellent Emergency Communications System

The Government Accountability Office (GAO)

Summary

The GAO building is a ten-story building including a penthouse, a basement and sub-basement and an underground garage. It covers approximately 1,935,500 square feet of space and consists of hundreds of offices with electrical, communications and storage closets on each of the office floors. The building also contains a gift shop, a small sundries store, a large loading dock, a cafeteria and a grade-level Day Care Center that includes an outdoor playground. Cooling towers, air handlers, a chemical storage area, various shops and a projection room are located in the penthouse (10th floor). The basement holds electrical transformer vault rooms, switch gear rooms, a parking garage, storage, a physical fitness room, a print shop, archive records center, security services facilities and additional shops. There is also a sub-basement. The entire third floor and a portion of the sixth are occupied by the Army Corps of Engineers and were not inspected by the OOC. The GAO Building is managed by UNICCO Government Services, a contractor; the General Services Administration provided steam service to the building during the OOC’s inspection, although gas-fired boilers have since been installed.

111th Congressional Inspection Findings

During the 111th Congress inspection, the OOC identified 373 hazards, a reduction of 267 findings, or 41%, since the 110th Congress. See Figure 1.

The team noted that GAO had abated many of the hazards found in the 110th Congress inspection. While 373 hazards remains a significant number, it is encouraging that none was a RAC 1 hazard, and 21% were RAC 2s. See Figure 2. The inspectors identified 159 fewer RAC 3 hazards and 50 fewer RAC 4 hazards during the 111th Congress.

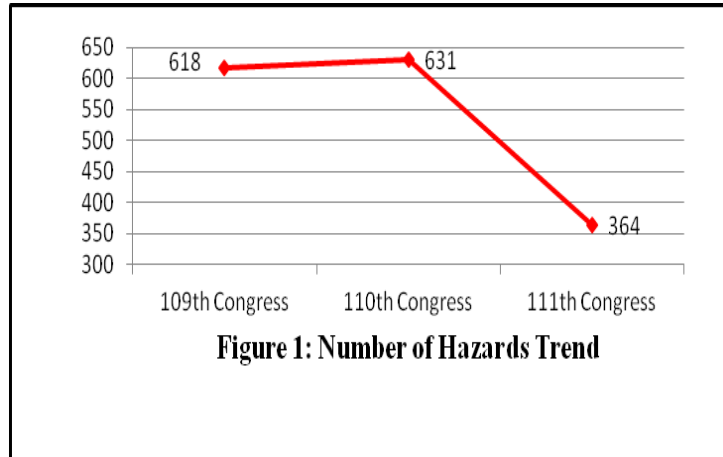


Figure 1: Number of Hazards Trend

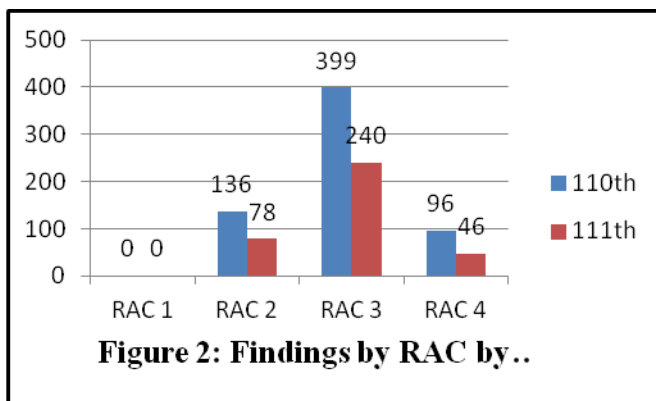


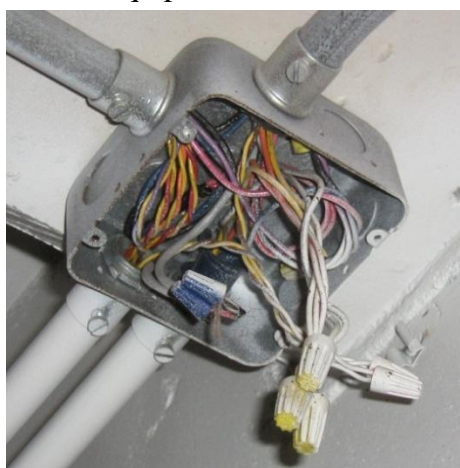
Figure 2: Findings by RAC by..

Figure 3 shows the 111th Congressional findings by major hazard categories.

Electrical hazards were the most common findings across all RAC levels. Of the 52 RAC 2 electrical findings, there were 26 missing electrical covers (See Picture 1), 9 electrical outlets and switches, 7 miscellaneous electrical hazards, 7 electrical panels hazards, and 3 improper use of extension cords. The inspectors found 41

instances of missing or damaged electrical equipment covers.

Most of the fire safety hazards identified dealt with missing ceiling tiles. Missing ceiling tiles can cause a delay in smoke detector and sprinkler head activation. Since heat rises, missing ceiling tiles will allow the heat to rise during a fire and accumulate in the areas above the ceiling tiles instead of activating fire detection equipment.



Picture 1: Open Electrical Junction Box

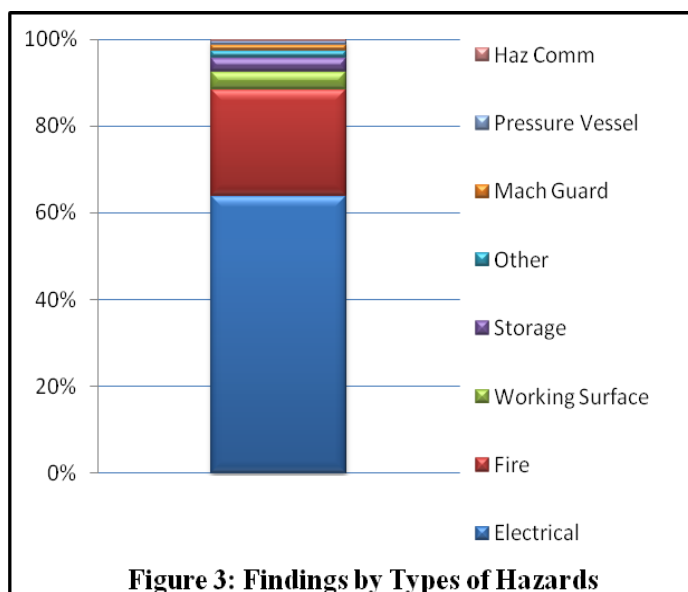


Figure 3: Findings by Types of Hazards

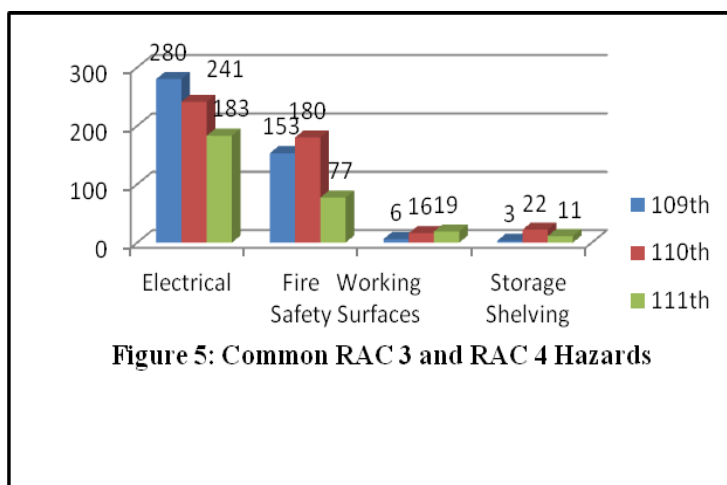
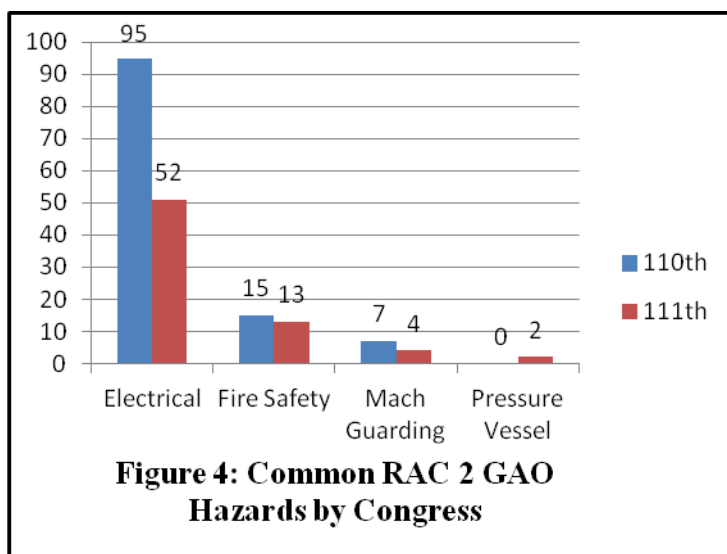
The 111th Congress inspection identified four machine guarding hazards. See Picture 2. This was 42% lower than the number of such hazards found in the previous Congress. The fire sprinkler system presented multiple hazards, including non-approved Omega sprinkler heads, sprinkler heads that had been spray-painted, and others that were covered with dust and dirt. In one case sprinkler heads had been installed upside down. The team noted a lack of required documentation stating that the fire sprinkler system is visually inspected annually and tested periodically.

Baseboards were missing on modular furniture in 13 instances, which can expose employees to shock hazards. Depending on the type of furniture being used, employees may not readily notice that the baseboards within their workstations have been disturbed. Employees may need training in order to identify this type of hazard and report it for immediate corrective action.

Less serious hazards commonly found in offices decreased significantly in the GAO Building. These include office electrical, fire safety, and working and walking surfaces hazards. These types of hazards are typically created by employees due to lack of training and limited access to resources such as power strips, space heaters with tip-over switches, and storage space.



Picture 2: Inadequate Guard Over V-belt & Pulley



The Office of Security Programs Jurisdiction – Architect of the Capitol Issues

Summary

The Architect of the Capitol is responsible for the maintenance of a number of facilities operated under the Office of Security Programs (OSP) jurisdiction. These facilities include parts of several buildings; many of these house the United States Capitol Police, including their Headquarters Building; the Fairchild Building; portions of the Government Printing Office; USCP Guard Posts; K9 Training and Kennel facilities; the Offsite Delivery Inspection facility; the Courier Acceptance Building; the USCP Vehicle Maintenance Shop; and a secure site in Virginia. The total area included in this group of facilities is approximately 800,000 square feet.

The 111th Congress inspections identified 87 findings, including 36 hazards rated as Risk Assessment Code (RAC) 2s; 41 RAC 3s, and 10 RAC 4s. Because the U.S. Capitol Police recently leased space for their operations in the Government Printing Office, the team inspected that area for the first time during the 111th Congressional inspections. Figure 2 displays the findings for the 111th Congress by RACs.

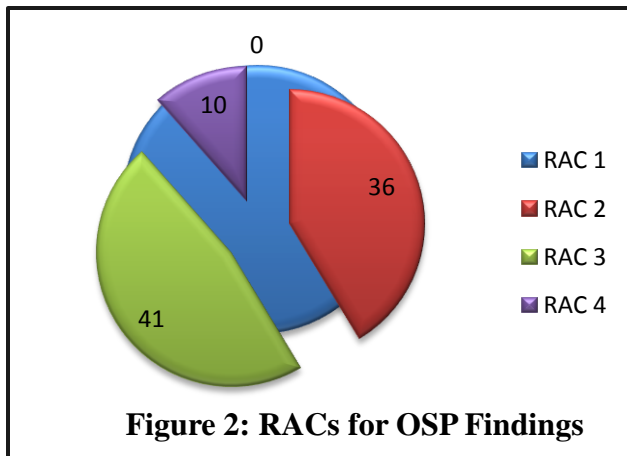


Figure 2: RACs for OSP Findings

The U.S. Capitol Police is responsible for remedying hazards created by USCP employees; those findings are discussed in a separate Appendix.

Figure 3 lists the facilities with the most hazards. Figure 4 displays the types of hazards found. Fire safety hazards and electrical hazards account for 94% of all the hazards found during the inspections.

A number of the fire safety hazards involved missing ceiling tiles, which can delay the

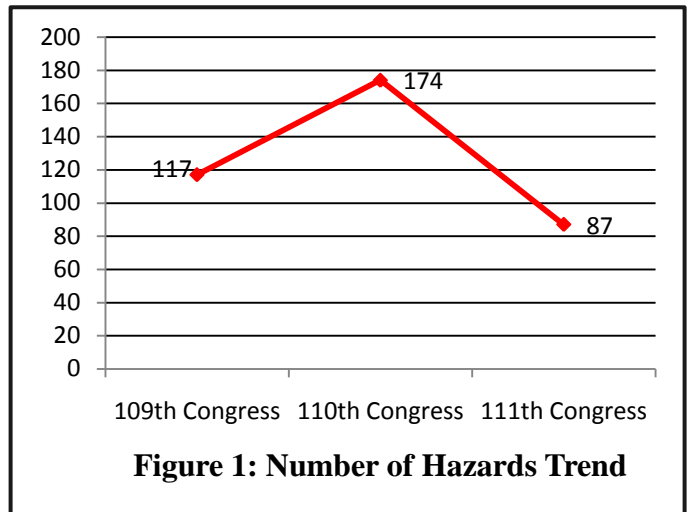


Figure 1: Number of Hazards Trend

As Figure 1 shows, the number of findings was reduced by 50% between the 110th and 111th Congresses. This reduction in hazard findings is particularly noteworthy given that it coincided with an increase in the area inspected. Correcting the hazards identified and discussed in this report is the responsibility of the Architect of the Capitol.

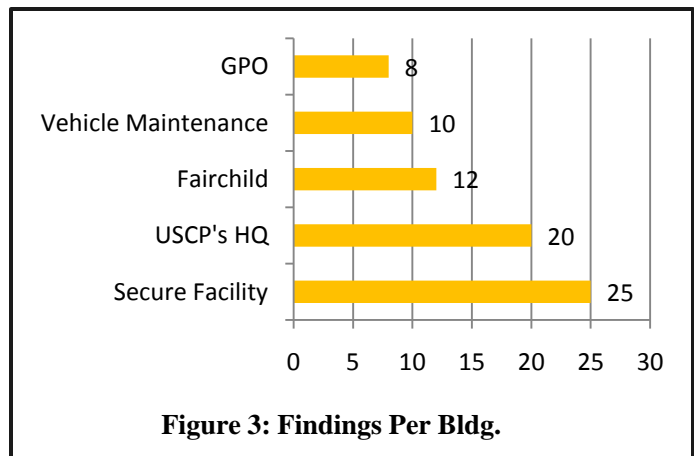
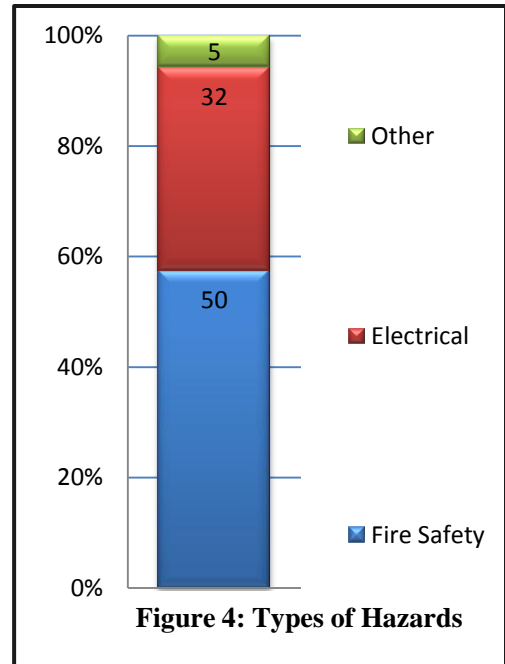


Figure 3: Findings Per Bldg.

activation of sprinklers and smoke detectors. As a consequence, a fire can become larger, smokier and more hazardous than would otherwise be the case. Additionally, there were 12 instances with missing or non-functioning emergency lighting. The inspectors documented 7 findings dealing with portable fire extinguishers. Problems with non-working fire doors were noted in 7 instances. The team found seven problems with exit signs and six deficiencies in ground fault circuit interruptors (GFCIs).

Many of the RAC 3 and RAC 4 hazards are relatively easy to correct. For example, replacement of ceiling tiles will help maintain proper operation of fire detection and suppression equipment. Similarly, periodic maintenance can keep fire doors operating, thus eliminating those hazards. The OOC has been advised that the OSP has had a self-inspection program in place since at least 2009; a thorough program should identify and facilitate prompt abatement of most of these hazards.



The Botanic Garden

The United States Botanic Garden is a complex of facilities operated by the Architect of the Capitol. The main portion of the Botanic Garden is located on Capitol Hill, and consists of the Conservatory and National Garden, Administrative Office Building and a new storage facility. The Conservatory has a high volume of public traffic. Buildings at DC Village, which is located in the District of Columbia along the Anacostia Freeway, include Administrative, Mechanical and Pesticides buildings, the Head House and numerous greenhouses.

The inspection team found significantly fewer hazards in the 111th Congress than during the 110th Congress. See Figure 1. Although the Administration Building was not inspected during the 111th Congress because it was undergoing renovation, only four hazards were found in that facility during the 110th Congress. The reduction in hazards is therefore attributable principally to improved conditions since the previous Congress.

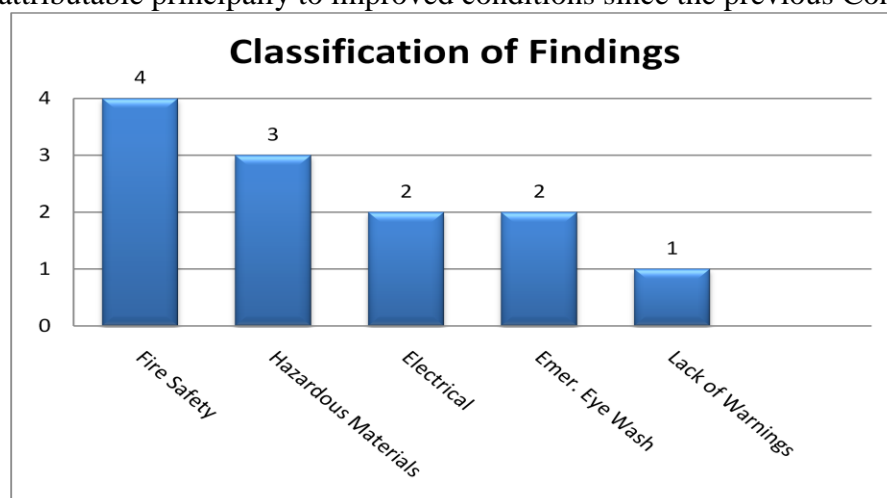
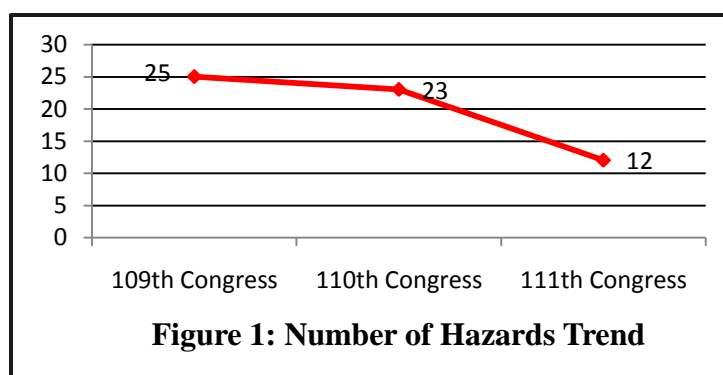


Figure 2: Classification of Findings

Figure 2 presents the 111th Congress inspection results by hazard category. Fire safety hazards accounted for 4 out of the 12 findings; two were RAC 2 and two were RAC 3. Included in these findings are issues dealing with emergency lighting and the obstruction of exit signs indicating the path to take during a fire emergency. Three findings are related to the handling and storage of hazardous chemicals, where labels were either illegible or missing altogether. Picture 1 shows electrical hazards involving the condition of the plug and power cord. The inspectors noted a missing Material Safety Data Sheet for a sealant that can produce a severe skin reaction. Employees were not aware of the hazards of this chemical so as to protect themselves from skin contact. Two Ground Fault Circuit Interrupters (GFCIs) presented electrical hazards. In one case, the GFCI did not work. In another case, the device arced and started to smoke when tested. Two RAC 2 findings were associated with emergency eye wash areas. In one instance, the wash was



Picture 1: The Plug Is Missing A Ground Prong & The Cord Has Been Pulled From The Device

too far from the location where the hazardous chemicals were being used; in the other case, no wash was present at all. A single RAC 3 finding involves an area where piping control valves and their stems protruded into a tunnel walkway without the requisite warnings.

During the 111th Congress, the Botanic Garden sought technical assistance from the Office of Compliance regarding a Lock Out/Tag Out program. The OOC provided comments and suggestions to Botanic Garden staff in developing and implementing the program.

The U.S. Capitol Building

Summary

This report describes the hazards found in the U.S. Capitol Building; the adjoining Capitol Visitor Center, which was inspected for the first time in the 111th Congress, is described in a separate Appendix. The Capitol Building consists of approximately 843,000 square feet of Member offices, Committee offices, Leadership areas, the House and Senate Chambers, common areas, Office of Attending Physician spaces, Chief Administrative Officer spaces, media galleries, cafeterias, mechanical areas and workshops. The Capitol Building also serves as a terminus for both the House and Senate subway systems, which run in single rail and multiple pedestrian tunnels between the Capitol Building and the House Office Buildings and the Senate Office Buildings. There is also a pedestrian tunnel between the Capitol Building and the Cannon House Office Building. As in the 109th and the 110th Congresses, the OOC inspection team was not granted access to inspect the Senate Chamber. However, the House Chamber was made available for both inspection cycles.

111th Congress Inspection Findings for the Capitol Building

The 111th Congress inspection identified 140 hazard findings, a reduction of 64% from the 391 hazards found during the previous Congress. See Figure 1.

This decline is consistent with the reductions the inspection team noted in other campus facilities. Further, the AOC employees (including an electrician) who accompanied the OOC inspectors abated many of the newly-identified hazards on the spot.

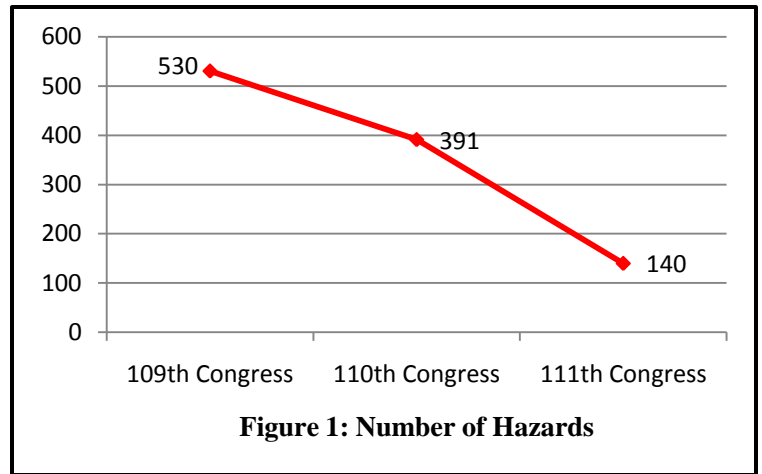
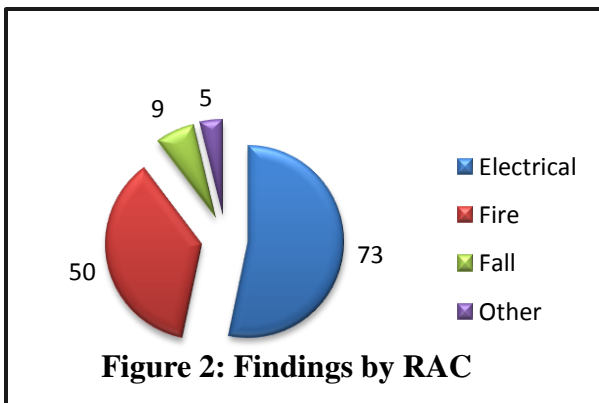


Figure 2 shows the 111th Congress findings broken down by Risk Assessment Codes (RACs). One finding was ranked as RAC 1, and 41 were ranked as RAC 2's. The combined number of RAC 2 and RAC 3 is 59% lower than that recorded during the 110th Congress.



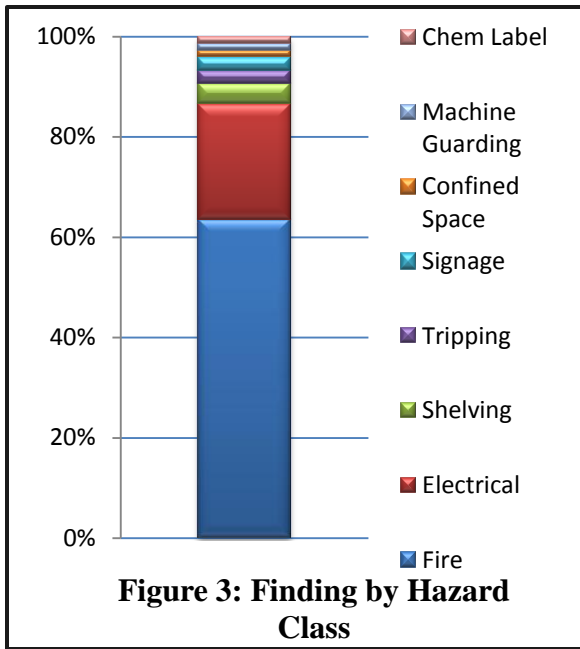


Figure 3 displays the seven types of hazards that we found most frequently in the Capitol. These were the same hazard types that were most common during the previous inspection. However, the number of such hazards was substantially lower – 66% fewer electrical deficiencies, 50% fewer fire hazards and 60% fewer fall protection violations.

Ongoing Fire Safety Issues

Several serious fire safety issues remain in the Capitol. Most notable is the citation regarding unprotected exit route stairwells and pathways that leave occupants exposed to the risk of fire, smoke, and other toxic gas inhalation during a fire and other emergencies. The AOC has made progress towards enclosing some of these stairways since the OOC issued Citation 16 in 2000. The AOC recently installed two new fire-rated exit discharge enclosures on the west basement wall level that increase

the Capitol’s emergency exit discharge capacity. This is an important fire safety improvement.

A smoke purge/control system, which is designed to provide fire protection while minimizing the impact on the Capitol’s historic architectural features, is planned for the two marble grand staircases by the House chamber and the two by the Senate chamber. The design work for these two new fire protection systems has been completed. Smoke detection coverage in the Capitol Building is being expanded and will be integrated into the Capitol Master Plan to reach complete coverage. Design work is ongoing to address the remaining spaces.

Fire Sprinkler System

Progress has also been made on sprinkler installations in the Capitol Building. The Capitol basement is now almost fully sprinkled, which increases the building’s coverage to roughly 30%. However, the high voltage switchgear rooms in the basement of the Capitol still do not have fire sprinklers. Under the proposed Capitol Master Plan, the building is to be fully covered by a fire sprinkler system. Installation of a second fire pump was completed in 2009 and 2010 to service the Senate side of the Capitol Building. Final acceptance testing of the fire pump occurred in FY2010.

Access to Electrical Power Being Improved

Employing offices and office managers with spaces in the Capitol Building are making headway in preventing the use of unapproved cords as permanent wiring. Demand for electrical outlets in this historic building makes this effort a challenge, as staff seeks to use computers, fax machines, copiers and telephones. The inspection team noticed only 8 instances of unapproved cords being used as permanent wiring and linking unapproved cords and/or linking power strips together in a “daisy chain” formation. Further, the emergency backup electrical power using emergency diesel generators has been greatly improved since the opening of the CVC to the extent that the battery pack units are no longer needed in the Capitol building to fully power all of the emergency electrical power needs.



Picture 1: Two Prong Electrical Outlets Must Be Replaced With 3 Prong Outlets

Exposure to Electrical Shock

The inspection team noted 12 GFCI violations. These hazards could cause electrical shock. Four electrical junction boxes had exposed wires and lacked a firmly affixed cover. There were six electrical panels missing breaker position covers or lacking a dead front. This was a 40% decrease from the 110th Congress. These deficiencies were remedied during the inspection cycle. The team found a number of two-prong outlets, which are hazardous because they are not grounded. See Pictures 1 and 2.

These old style receptacles were later replaced with three-prong, grounded outlets.



Picture 2: Displays Receptacle With High Impedance

Fall Protection

A notable remaining example of a slip and fall hazard is a historic spiral staircase that connects the ground floor of the Capitol with the second floor. There is no handrail and the steps are worn, creating a potential hazard. This finding was noted during the 110th Congress and continued into the 111th. The OOC has been informed that fabrication of the handrail is underway. Walking on a steep and at times wet and slippery metal roof was the only means to access the flag pole on the east front. The AOC constructed a stairway and hatch from the attic to the roof near the flag pole for safer and easier access. See Picture 3.



Picture 3: Example Of An Excellent Solution To A Fall Hazard

Machine Guarding

Only one mechanical device was identified that lacked complete machine guarding to prevent contact with moving or rotating parts – a significant decrease from the five that the team found during the 110th Congressional inspection. This deficiency was remedied during the inspection cycle.

The House of Representatives

Summary

The House of Representatives comprises the single largest legislative branch complex in the Metropolitan Washington, D.C. area. The facilities under House jurisdiction include the Longworth, Rayburn, Cannon, and Ford Buildings, the East and West underground garages, the House Page School, the House Page Dormitory, the E Street Garage, two subways connecting the Rayburn and Cannon Buildings, respectively, to the Capitol, and 10 pedestrian tunnels. These facilities encompass approximately 5.2 million square feet of space. Each office building has multiple floors, containing Member and Committee offices, Hearing Rooms, support staff offices, workshops, mechanical rooms, and garages. The Longworth, Rayburn and Ford Buildings also include cafeterias, coffee shops, and credit union offices; in addition, Longworth contains a gift shop and Cannon contains a carry-out food service facility. The House occupies space in the Capitol Visitor Center as well; that inspection data is found in the Appendix entitled “Capitol Visitor Center.”

111th Congressional Inspection Findings

The 111th Congress inspection found 1,861 hazards, a reduction of 52% since the 110th Congress. See Figure 1. We attribute this significant decrease in large measure to the outreach, education, pre-inspection and training provided by the AOC House Superintendent’s Office and the Chief Administrative Office. The AOC employees (including several electricians) who accompanied inspectors abated many of the newly-identified hazards on the spot.

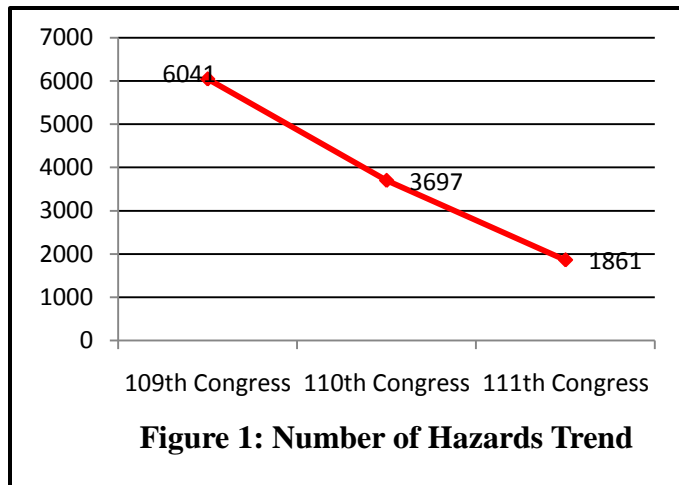
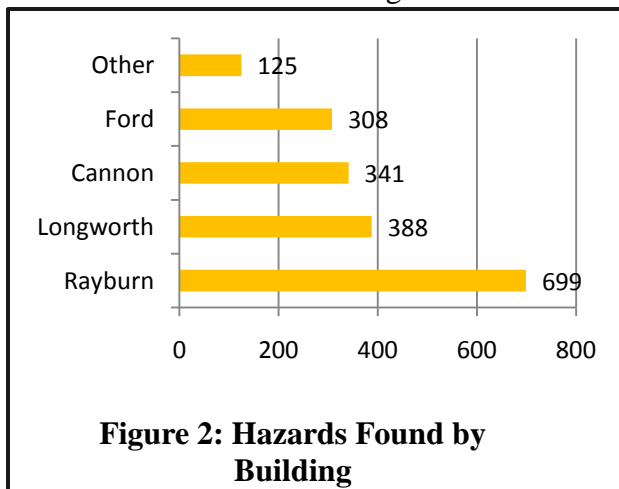


Figure 2 shows the number of hazards found in each of the four largest House Office Buildings; hazards found in the remaining facilities are included in the “other” category. The Rayburn



House Office Building has 2.3 million square feet, Longworth has roughly 700,000 square feet, Cannon has just over 800,000 square feet and Ford has almost 600,000 square feet.

Figure 3 breaks down findings by Risk Assessment Codes (RACs). In a significant improvement, RAC 3 findings dropped by 47% compared to the 110th Congress. The three RAC 1 findings involved fire and life safety hazards that were the subject of OOC Citations 17 and 18, issued in 2000. Figure 4 shows the findings by responsible office.

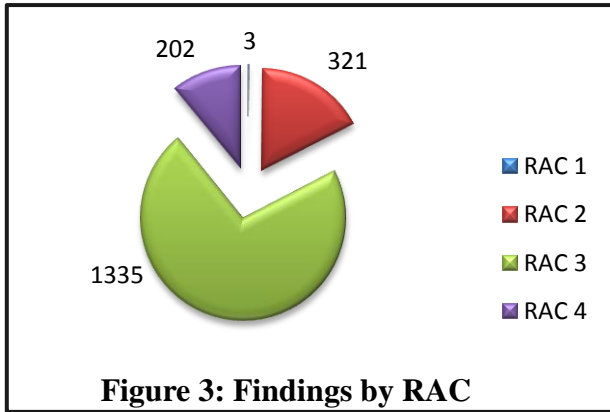


Figure 3: Findings by RAC

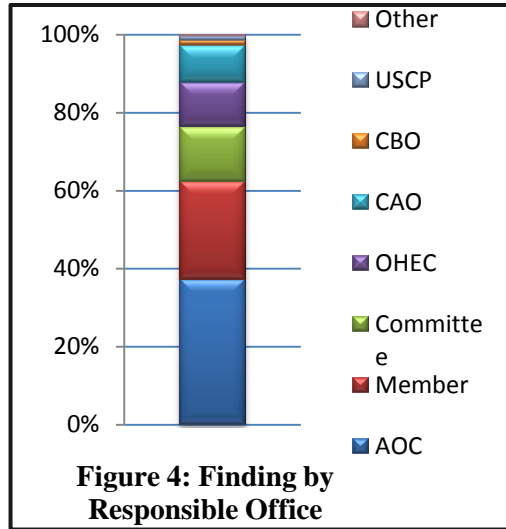


Figure 4: Finding by Responsible Office

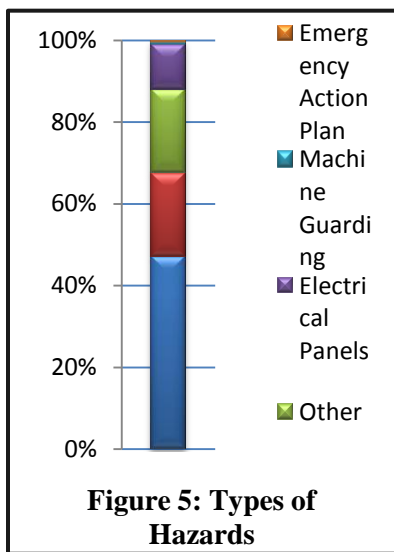


Figure 5: Types of Hazards

As Figure 5 indicates, 50% of the hazards that the team found involved electrical issues. These hazards include deficiencies with outlets, electrical covers, cords, plugs and electrical panels. See Figure 6. The inspectors noted a high incidence of exposed live wiring behind outlets and switches, as well as in damaged cords and plugs. See Picture 1. The team found 56 Ground Fault Circuit Interrupter (GFCI) hazards, including 13 broken GFCIs. These devices can quickly cut the power when a short is detected. Forty-three locations were identified where GFCIs should have been installed and were not. In 35 of these cases, outlets located less than six feet from a water source lacked requisite



Picture 1: Open Electrical Box.

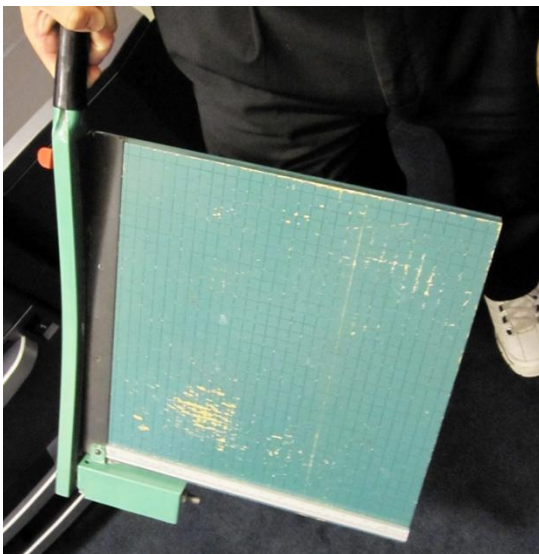
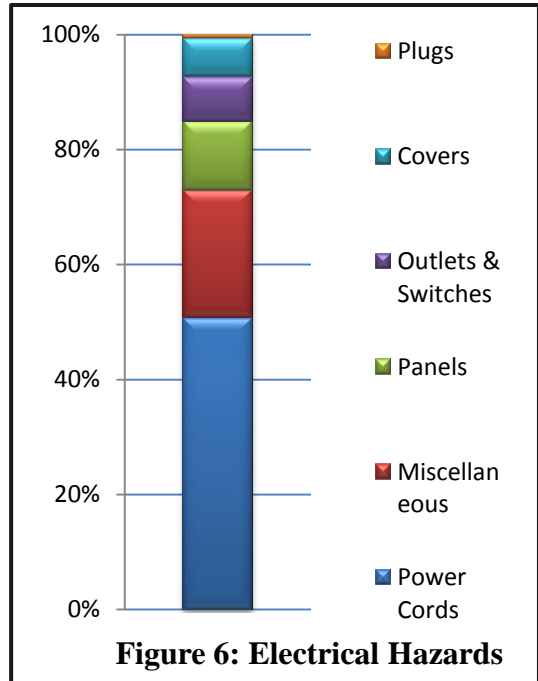
protection. GFCIs are especially important in wet locations where contact with energized electrical parts can be fatal. Twenty three hazards associated with GFCIs were found in the Rayburn Building. Sixteen were found in the Longworth Building. Seven were found in Cannon and 4 in Ford.

The inspectors found nine hazards associated with missing or inadequate machine guarding. Although this represents a small percentage of the total, see Figure 5, these hazards can be very serious. Inspectors found paper cutters that lacked appropriate finger guards. See Picture 2. The team also identified missing or broken guards on portable electric fans. In workshops, the team found several saws and bench grinders that lacked guards to prevent the operator from reaching into the point of operation.

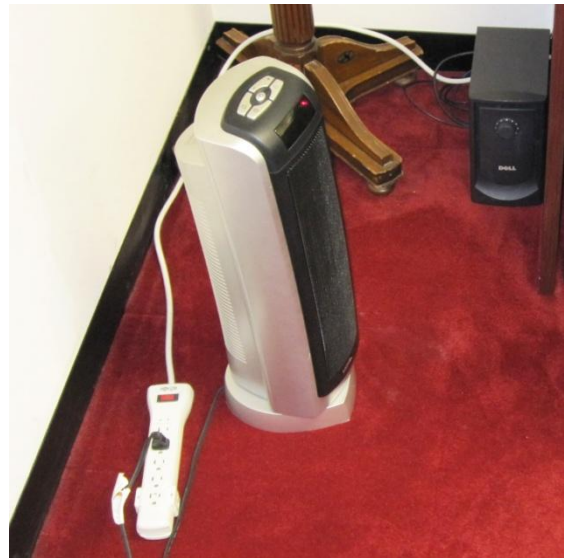
Fire safety hazards were documented in 329 findings. Problems with portable electric space heaters accounted for 105 findings. See Picture 3. Ten of the space heaters had broken parts such as legs or mounts. Most lacked a tip-over switch to shut off the heat if the device were turned on

its side; this prevents the coils from heating carpet or flooring to the point of catching fire. The inspectors found 18 such heaters in the Cannon Building, 23 in the Ford Building and 50 in the Rayburn Building. We understand that the CAO has prepared a list of space heaters featuring tip-over switches that could replace the non-compliant devices.

The inspectors noted just 2 hazards involving permit-required confined space labeling, a reduction of 90% since the 110th Congress inspection. The team also found a substantial reduction in hazards associated with missing or inadequate emergency lighting: 16 in the 111th Congress compared with 19 in the 110th Congress. The AOC’s House Superintendent deserves a good deal of credit for targeting and correcting these hazardous conditions.



Picture 2: Missing Finger Guard



Picture 3: Portable Space Heater No Tip Switch

The Senate Facilities

Summary

The Senate has jurisdiction over ten buildings (excluding areas within the Capitol Visitor Center, which are described in the Capitol Building report), including three office buildings, underground garages, space in the Postal Square building, two furniture warehouses, the Senate Child Care Center, a Page dormitory and school, two mail processing facilities (one in Cheverly and one in the Congressional Acceptance Site, usually referred to as the “Old Crib”) and storage areas in two GPO Buildings. The Hart Senate Office Building (HSOB) covers 1,271,000 square feet of floor space that includes garage levels and rooms on these levels. The Dirksen Senate Office Building (DSOB) encompasses 750,500 square feet including parking space in the garage levels. The Russell Senate Office Building has 699,000 square feet floor space which includes the attic and swing space in the courtyard. The remaining Senate buildings and spaces encompass over 350,000 square feet of additional space.

111th Congressional Inspection Findings

During the 111th Congress inspections, the Office of Compliance identified 662 hazards -758 fewer than were found during the 110th Congress. This 53% reduction is primarily attributable to the efforts of both the AOC/Senate Superintendent’s staff, which developed training aids to educate employees on common safety hazards and findings, and the Senate Chief Counsel for Employment, whose staff visited Member and Committee offices to conduct pre-inspections and educate employees on occupational safety and health

requirements. In addition, the AOC installed modular furniture in many Member offices. These efforts significantly reduced the number of hazards in Senate spaces. See Figure 1. In a positive development, AOC employees (including an electrician) accompanied the inspection team and abated many of the newly-identified hazards on the spot.

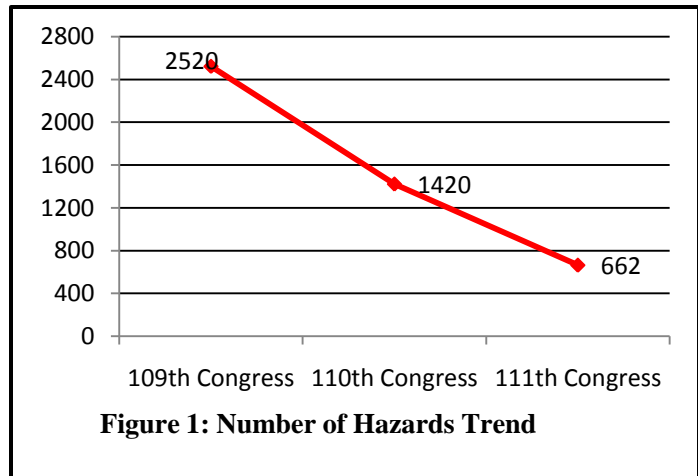


Figure 1: Number of Hazards Trend

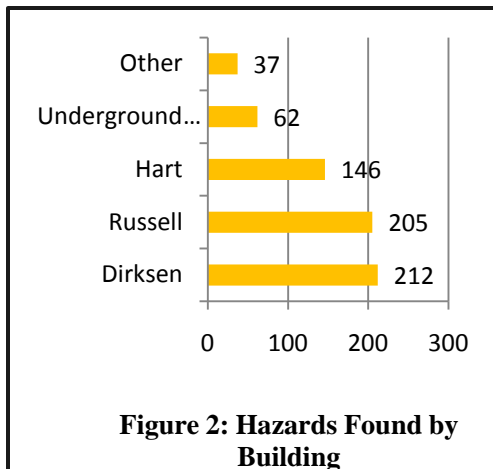


Figure 2: Hazards Found by Building

The Dirksen and Russell Buildings had 212 and 205 hazard findings, respectively. See Figure 2. These are the two oldest of the Senate Buildings. Figure 3 illustrates the distribution of findings in Senate buildings by Risk Assessment Codes (RACs). The RAC 1 hazards deal with the lack of enclosed stairwells and exit route integrity in the Russell Senate Office Building. These very serious hazards are the subject of the Office’s Citation 19, which was issued in 2000.

Figure 4 shows the findings by responsible office. During the 110th Congress, roughly half of the findings

were the responsibility of Senate employing office including Members, Committees, the Sergeant at Arms, this percentage dropped to 22% for the 111th inspections. The remaining findings fell within the jurisdiction of the AOC, including structural and electrical hazards.

Figure 5 illustrates the breakdown of findings by hazard category or class. Electrical hazards are the most common findings, comprising 52% of the total. Fire safety hazards made up roughly 32% of the total, while the remaining findings were distributed among a number of categories. Electrical hazards include damaged or severely pinched electrical power cords, broken or burned outlets and switches, and junction boxes that were missing covers. The AOC is updating the electrical panels' directories, although the work is not yet complete. The maintenance of electrical panels remains a problem. Many panels are unlabeled or mislabeled. In addition, access to a number of electrical panels is blocked, which poses a threat in case of an emergency. Picture 1 displays an opening in an electrical panel circuit breaker box and energized contacts are exposed.

The inspection team also recorded 30 findings dealing with missing or non-working ground fault circuit interrupters (GFCIs). GFCIs are especially important in wet locations to prevent employees from fatal electrical shock.



Picture 1: Electrical Box Hole Exposing Energized Contacts

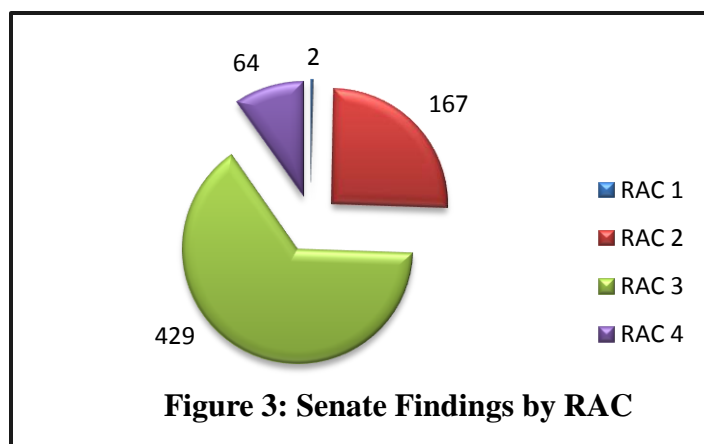


Figure 3: Senate Findings by RAC

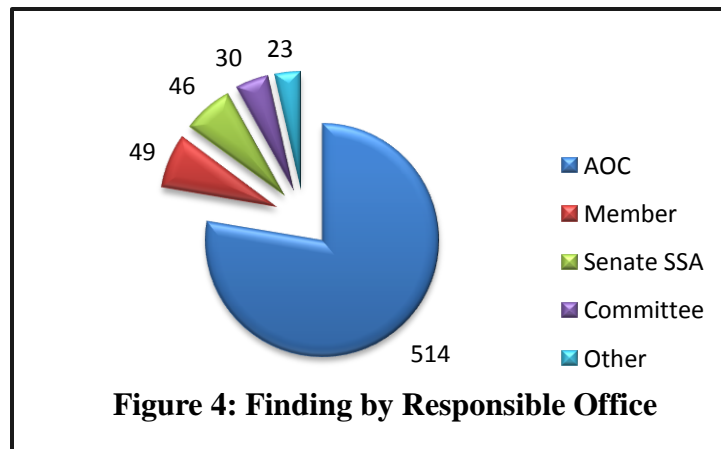


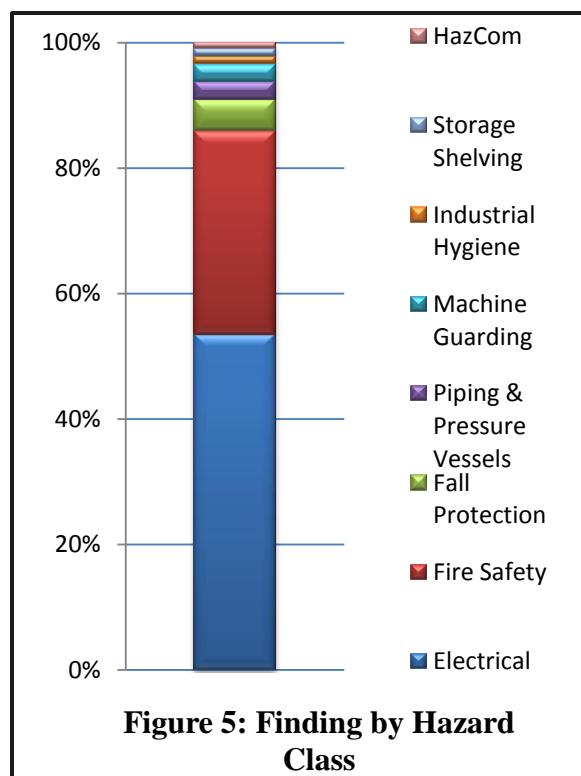
Figure 4: Finding by Responsible Office

The team found 19 hazards dealing with pressure vessel safety. The AOC is expected to conduct periodic testing on piping and pressure relief valves that carry steam and compressed gas to various parts of the buildings. There were several findings for high noise levels in steam stations in the buildings. Sound level monitoring needs to be conducted as well as documentary studies for employees required to work in these areas in order to determine the need for hearing protection or a hearing conservation program. Several areas were documented where deteriorating pipe lagging could allow presumed asbestos containing materials to become air

borne and present a hazard to employees working around these materials. Other RAC 2 hazards in the Senate involve fire safety. A general finding pertaining to the entire Dirksen facility exists for most committee and hearing rooms because they lack signage to exit routes. A general finding was documented for the Russell Building in that many of the stairways with four or more steps lack a handrail.¹ A general finding was recorded for the Furniture Warehouse located at DC Village because the fire alarm system has not been annually inspected. In addition, a general finding was recorded for the Congressional Acceptance Site called the Old Crib Building because the facility lacks an annunciator alarm system to alert employees of an emergency.

The team noted a disturbing increase in machine guarding hazards, from 8 in the 110th Congress to 18 during the 111th Congress. In a number of instances mechanized equipment, power tools, and air handler belts lacked guards required to protect workers against injury from hazardous moving parts. The inspection team also identified several cases where machine guarding was inadequate and did not provide employees with the necessary protection.

On a positive note, the inspectors found that the AOC had made exceptional progress in eliminating the use of extension cords and halting the use of daisy chaining power strips. AOC has also developed an excellent program for checking that portable fire extinguishers were in working condition.



¹ The AOC is responsible for abating these two hazard findings.

The U.S. Supreme Court – Legislative Branch Occupied Spaces

Summary

Although the Supreme Court is almost entirely under the jurisdiction of the Judicial Branch, Architect of the Capitol (AOC) personnel maintain and provide support services for the Supreme Court building and certain of its systems. Accordingly, the Office of Compliance inspects those spaces within the Supreme Court in which AOC personnel have dedicated work areas. The team inspected a suite of offices; several mechanical shops; storage areas; mechanical rooms; elevator machinery rooms; and the routes to those work areas. The AOC will move into additional workspaces once their renovation is complete, and the Office of Compliance will inspect at that time.

The number of hazards was cut by nearly 60% between the 110th and 111th Congress inspections. See Figure 1. The AOC's preinspection process accounts for much of this reduction, as AOC employees identified and corrected hazards before the Office of Compliance team began its inspection.

The most common hazards were electrical findings, including electrical cord deficiencies. See Figure 2. The team also identified two machine guarding hazards on a drill press, and two fire safety hazards that consisted of missing or inadequately illuminated exit signs. The remaining violations involved two storage problems and one deficiency with respect to an emergency eye wash area.

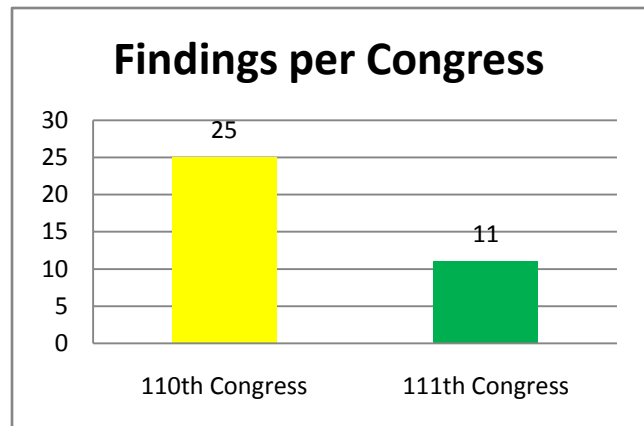


Figure 1: Findings per Congress

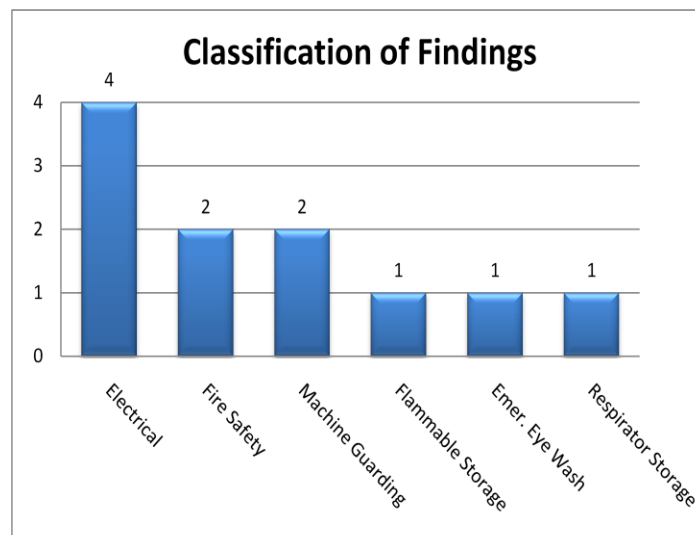


Figure 2: Classification of Findings

The United States Capitol Police

Summary

The United States Capitol Police (USCP) protects Congress, Members, employees, visitors and facilities from crime, disruption or terrorism. USCP officers are posted on street corners, guarding the entries to buildings and patrolling hallways across campus, as well as in facilities under their own jurisdiction. Officers work in and around 16 facilities throughout the legislative branch. These facilities include the Eney, Chestnut and Gibson Building, which is frequently referred to as the Headquarters Building; the Fairchild Building; USCP Guard Posts; K9 Training and Kennel facilities; the Offsite Delivery Inspection facility; the Senate Mail Sorting facility; and the USCP Vehicle Maintenance Shop. During the 111th Congress, the USCP began leasing space from the Government Printing Office (GPO). That space was inspected for the first time in this inspection cycle. In total, the USCP occupies approximately 400,000 square feet of work space.

This report is limited to hazards that the U.S. Capitol Police is responsible for abating. The Architect of the Capitol (AOC) maintains many of the facilities in which USCP officers are employed; accordingly, the AOC is responsible for correcting a number of hazards located in those facilities, which are discussed in the Appendix entitled “Office of Security Programs.”

111th Congress Inspection Findings

During the 111th Congress, the inspection team identified 122 hazards, which represented a decrease of 19% from the 150 hazards found during the 110th Congress. See Figure 1. This reduction is consistent with other employing office inspections across the campus.

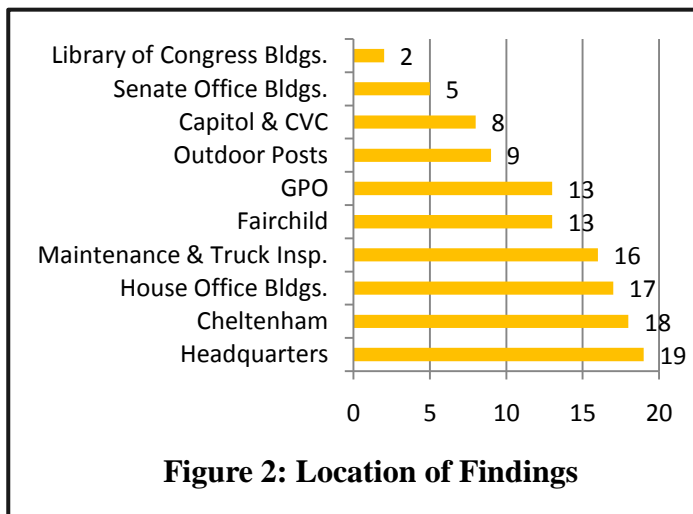
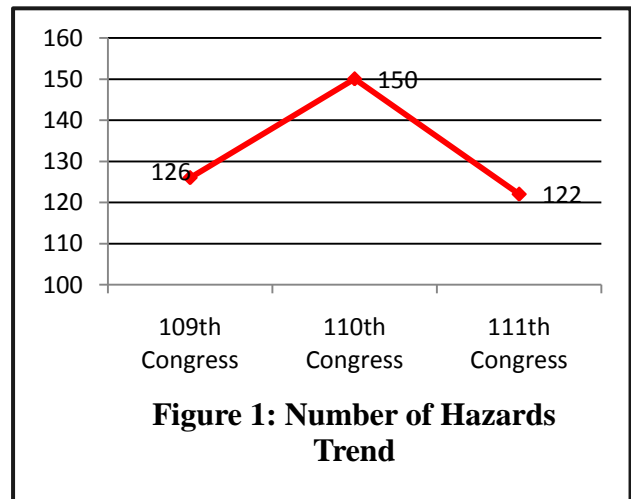


Figure 2 shows the location of findings.

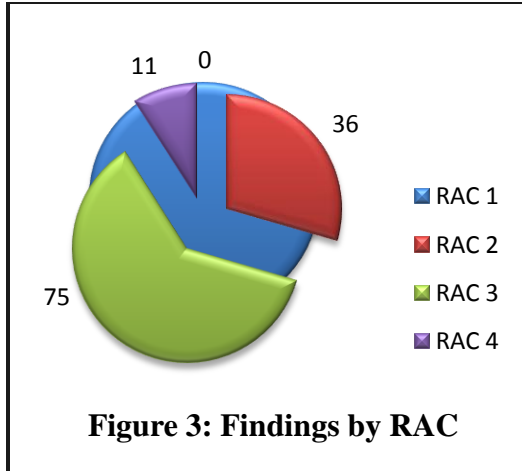
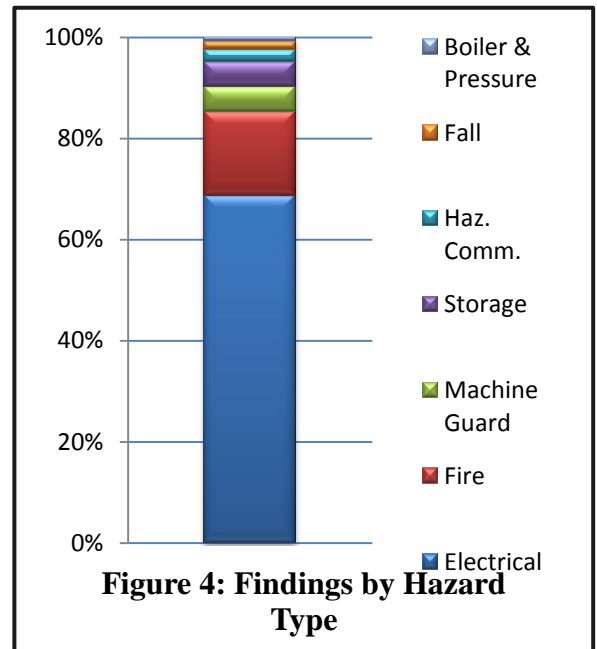


Figure 3 breaks down findings by Risk Assessment Code (RAC). The team did not find any of the most serious hazards (RAC 1), although 36 were RAC 2 and 75 were RAC 3. As shown in Figure 4, 69% of the total findings were electrical hazards. These hazards included missing or damaged junction box covers, damaged electrical cords and plugs, missing baseboards on modular furniture that exposed energized contacts, and blocked or mislabeled electrical panels. Fire and life safety hazards accounted for 16% of the total findings.

Many of the RAC 2 hazards are easily preventable, such as eliminating the use of unapproved extension cords, removing daisy-chained extension cords, using only approved space heaters with tip-over switches, and replacing cover plates on electrical junction boxes. Similarly, keeping sprinkler heads clear allows water to be distributed as designed in case of fire, while keeping aisle ways clear and exit signs visible promotes quick egress during an emergency.

During the 111th Congress, USCP officers assigned to the Capitol Building were able to move their equipment and meeting areas out of the Capitol’s west ground level corridor into dedicated space in the Capitol Visitor Center. This change should expedite emergency evacuations from the Capitol.

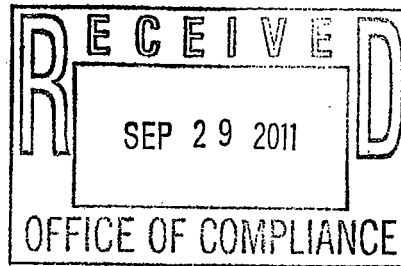




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September 27, 2011

Mr. Peter Ames Eveleth
 General Counsel
 Office of Compliance
 110 Second Street, SE
 Room LA-200, John Adams Building
 Washington, DC 20540-1999



Dear Mr. Eveleth:

This letter provides comments on the Office of Compliance's *DRAFT Safety & Health in the Congressional Workplace Report on the 111th Congress Biennial Occupational Safety & Health Inspections* (Draft Report). These comments are intended for inclusion in the final report, subject to security review by the U.S. Capitol Police. In order to assist in highlighting specific content issues prior to final publication, on September 6, 2011, Ms. Susan Adams, Director of Safety, Fire, and Environmental Programs, submitted detailed comments.

It is with pleasure that I provide the enclosed summary of the Architect of the Capitol's (AOC) safety-related accomplishments during the 111th Congress. Safety is a top priority at the AOC. Since FY 2007, Congress has invested over \$210 million in more than 55 fire, life, and occupational safety projects to improve the safety in the buildings entrusted to our care, and for the people who work and visit here. As you can see in the enclosed materials and as discussed below, significant progress has been made in a number of areas.

Your Draft Report provides a good description of the challenges faced by the Legislative Branch. While I appreciate the Office of Compliance's attempts to recognize progress, it is important that the Draft Report provide a balanced view of the overall state of safety today, and that it clearly articulates the tremendous progress being made across the Legislative Branch.

The news is extremely positive. All indicators show significant improvements in safety. Eleven AOC Citations and 21 AOC Occupational Safety and Health Cases were closed during the 111th Congress. Requests for Inspection have decreased across the Legislative Branch. Biennial inspection findings have decreased with the AOC's findings declining by 40 percent. Seventy-eight percent of AOC findings are now closed. (See Enclosure 1, Table 7)

The Draft Report indicates, "In short, safety and health conditions in the legislative workplaces continue to improve." I wholeheartedly agree. In fact, the level of safety and health within legislative workplaces has never been higher. Significant progress has been made in a number of facility-related

efforts. The Draft Report enumerates several examples of these successful efforts: "significant progress in reducing [utility tunnel] hazards by means of egress installation, concrete and structural improvements, ventilation system installation, and electrical and lighting upgrades;" "...virtually all the exit stairways in the Longworth House Office Building have been enclosed;" "...significant progress [has been made] in reducing hazards by means of egress installation, concrete and structural improvements, ventilation system installation and electrical and lighting upgrades;" sprinkler and smoke detector coverage "...are at or near 100% coverage." For further examples of the improvements made, please refer to the summary provided in the enclosure.

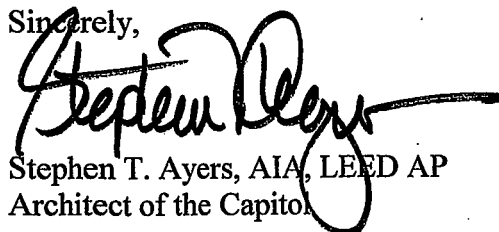
Regarding references concerning the Blue Ribbon Panel, I discourage any discussion of the Blue Ribbon Panel Report in your biennial report. As you know, the Blue Ribbon Panel Report was commissioned by the Senate Committee on Rules and Administration. Therefore, the Committee is the owner of the report and holds the authority regarding the release of any information contained in the report. It was not intended for public discussion and contains information that is security sensitive, including and not limited to, technical data about the Russell Senate Office Building's infrastructure and potential vulnerabilities. Furthermore, public discussion of the contents of the Blue Ribbon Panel Report is unnecessary because the relevant stakeholders have access to the report.

Finally, the Office of Compliance has acknowledged as a matter of public record that it has no authority to make the Blue Ribbon Panel Report public. On September 30, 2010, Ms. Tamara Chrisler, Office of Compliance Executive Director, testified before the House Transportation Subcommittee on Economic Development, Public Buildings and Emergency Management. In response to an inquiry regarding the Office of Compliance's intent to publish the Blue Ribbon Panel Report, Ms. Chrisler responded: "The report is not ours to make public."

Substantial progress has been made both within the AOC and across the Legislative Branch. The record shows that the level of safety has never been higher and continues to improve. The AOC is committed to continuing to work in a prioritized and fiscally responsible manner using available resources to address future challenges. I encourage your office to continue to ensure that reports present a balanced perspective of the issues facing the Legislative Branch so that priorities and resources may be allocated appropriately.

I appreciate the opportunity to provide comments on the Draft Report and look forward to our continued joint efforts to improve the safety of those who work in and visit the Capitol campus. Please do not hesitate to contact me at 202.228.1793 if you would like additional information or to discuss this matter further.

Sincerely,



Stephen T. Ayers, AIA, LEED AP
Architect of the Capitol

Enclosure

Doc. No. 110922-03-01

**AOC Significant Accomplishments
In Occupational Safety and Health (OSH)
111th Congress**

**A. Building Sprinkler and Smoke Detection System Coverage Statistics
FY09 – FY10:**

**Table 1: August 2011 Status of Smoke Detection and Sprinkler Coverage in
Congressional Office, Daycare and Dormitory Buildings**

Jurisdiction	Building	% Sprinkler Coverage	% Smoke Detector Coverage	Comments
U.S. Capitol	US Capitol	30%	100%	Sprinkler installation will be performed as part of Capitol Master Plan implementation. Smoke detector installation is complete.
House Office Buildings	Cannon	100%	100%	Additional areas identified during installation and inspections completed in FY 11.
	Longworth	99%	100%	Smoke detection installation completed in FY10. Sprinkler installation to be performed as funding and client schedules permit.
	Rayburn	100%	100%	None
	Ford	100%	100%	None
	House Page Dorm	100%	100%	None
Senate Office Buildings	Hart Building	98%	20%	HSOB Fire Alarm Upgrade completion Phase 1 FY11, Phase 2 FY17; HSOB Modular Furniture Upgrade completion FY12; HSOB Attic sprinklers completed FY10.
	Dirksen Building	95%	85%	Phase II Basement and Sub-Basement sprinkler system complete.
	Russell Building	97%	80%	RSOB Attic sprinkler complete; RSOB Sprinklers (throughout) completion FY11.
	Webster Page Dorm	100%	100%	Fire alarm system replacement completed FY10.
	Senate Child Care	100%	100%	Fire alarm system replacement completed FY09.
	Senate Underground Garage	100%	100%	SUG Fire Alarm installation completed FY09; SUG sprinklers completion FY12.
	Subway Tunnels	0%	0%	Sprinkler completion FY12, Fire Alarm completion FY17.

Jurisdiction	Building	% Sprinkler Coverage	% Smoke Detector Coverage	Comments
Library of Congress Buildings	Thomas Jefferson	97%	100%	1) Phase 1 sprinkler upgrades completed 2009. Phase 2 System Expansion construction is underway with sprinklers completed on the 2 nd floor and in attic spaces. Ground Floor work expected to be complete 2011; 2) Smoke detection has been installed throughout the building. Acceptance testing completed in 2009.
	John Adams	100%	90%	1) Adams sprinkler systems upgrades completed in 2009; 2) Construction on smoke detector installation has begun. Approximately 55% of the work is complete.
	James Madison	100%	90%	1) Sprinkler protection has been provided throughout the building since 2007; 2) Construction on smoke detector installation has begun. Approximately 50% of the work is complete.
	Ft Meade Module 1	100%	100%	
	Ft Meade Warehouses	0%	100%	As of Aug 2007
	Saint Cecilia's D.C.	40%	100%	100% in occupied spaces.
Office of Security Programs (Owned)	US Capitol Police Headquarters	100%	100%	Smoke detector coverage is reported as zone coverage.
	USCP Canine Facility	100%	100%	Smoke detector coverage is reported as zone coverage. Trailers are not included.
	USCP Interim Offsite Delivery Facility	100%	0%	Does not include trailers. Does not include vehicle inspection tent.
	USCP Kiosks (57 total)	0%	0%	
	Alternate Computer Facility	100%	100%	
Office of Security Programs (Leased)	Fairchild Building	100%	100%	100% sprinkler protected as per code, including dead areas, i.e., electrical closets. USCP and AOC occupy floors 1, 2, 3, 5, 7 and 8.
	GPO	100%	100%	USCP occupies space on the First and Third floors.
	67 K Street, SW	98%	98%	All occupied areas are fully covered with smoke detection and sprinklers. The basement, with two small rooms (not occupied), is not sprinkler protected and does not contain smoke detectors.

B. Fire and Life Safety Building Feature Improvements FY09 – FY10:

Table 2a: U.S. Capitol Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Timeframe	Brief Description of Accomplishment
FY10	Installation of a Redundant Fire Pump on the Senate Side of the Capitol.
On-going	West Grand Stair Enclosure (Coordinating with Leadership to receive approval to proceed).
On-going	Installation of Smoke Control System in Four Grand Stairs (Engineered Equivalency to Stair Enclosure): Design completed. Construction award expected by first quarter FY12. 12 month project construction duration.
On-going	West Front Egress Stair (Design Complete: Funding will be requested in the FY16 Budget Submission).
On-going	Egress Modifications to Old Senate/Supreme Court Chambers (Design Complete: Funding will be requested in the FY15 Budget Submission).
On-going	Senate Attic Egress Stair (Design Modifications Underway: Construction funding will be requested in the FY15 Budget Submission)
On-going	Installation of a New Addressable Fire Alarm Detection and Notification System (Design underway with expected completion in the 2 nd Quarter of FY12)
Master Plan	Building Sprinkler Coverage (30% complete: 100% Completion dependent on Capitol Building Master Plan Implementation)

Table 2b: House Office Buildings Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
HOB-wide	Ongoing	Installing a central fire alarm monitoring system for all House Office Buildings.
Cannon	FY10	Corrected doors swing deficiencies on Basement Floor of Stairwells 5, 6, and 7.
Cannon	FY10	Modifications to Roof Fall Protection System.
Cannon	FY10	Replaced existing smoke detectors in Member Suites.
Cannon	FY10	Installed heat detection and sprinkler protection throughout all elevator machine rooms.
Cannon	FY10	Installed emergency generator power to both fire pumps.
Cannon	FY10	Completed Alternative Egress Design to improve exiting arrangements.
Cannon	FY10	Completed design to install fire rated horizontal exits throughout building to close out open Stairwell Citation. Construction funding requested in FY12.
Cannon	FY10	Provided ADA compliant Men's and Women's restrooms on the 5 th Floor.
Rayburn	FY09	UL Field Listed 37 Stairwell doors on the Garage and Sub-Basement Levels to close out Open Stairwell Citation.
Rayburn	FY10	Completed Prescriptive Egress Design to improve exiting arrangements.
Rayburn	FY10	Upgraded fire alarm visual notification system to more than double capacity.
Rayburn	Ongoing	Upgrading emergency lighting and exit signs throughout entire building. Planned completion date is FY11.
Longworth	FY09	Installed ADA compliant handrails along both ramps between Longworth and Rayburn and along South ramp between Longworth and Cannon.
Longworth	FY09	Installed redundant fire pump.
Longworth	FY09	Upgraded emergency lighting and exit signs throughout entire building.

Building	Timeframe	Brief Description of Accomplishment
Longworth	FY09	Completed design for new addressable fire alarm system.
Longworth	Ongoing	Currently installing fire rated walls at all stairwell landings to close out open Stairwell Citation. Planned completion date is FY11.
Longworth	FY10	Installed emergency generator power to both fire pumps.
Ford	FY09	Completed installation of sprinkler system in data and telecom rooms.
House Page Dorm	Ongoing	Design underway for new addressable fire alarm system.

Table 2c: Senate Office Buildings Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Hart	FY09-FY10	Modular Furniture Upgrade sprinkler modifications.
Hart	FY10	Attic Sprinkler System completed.
Hart	FY10	MER Sprinkler Protection completed.
Russell	FY10	Blue Ribbon Panel Report completed.
Russell	FY010	Exterior handrail construction completed.
Russell	FY09	Additional Egress Capacity completed (SW corner, 1 st floor).
SUG	FY10	Sprinkler installation completed.
SUG	FY10	Fire alarm installation completed.
SECCC	FY09	Installation of New Fire Alarm System completed.
SECCC	FY09	Emergency Generator Completed.
DWPD	FY09	Emergency Generator Completed.

Table 2d: Library Buildings and Grounds Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Thomas Jefferson	FY09	100% Coverage of smoke detection provided.
Thomas Jefferson	FY07	Completed design for Emergency Lighting Upgrades. Construction funding requested in FY13.
Thomas Jefferson	FY11	Sprinkler installation Phase II construction to be completed in 2011. Phase III construction funding was requested as part of FY12 budget.
Thomas Jefferson	FY09	Stair interrupters installed in all exit stairs at the level of exit discharge.
Thomas Jefferson	FY08	Stair signage installed in all exit stairs.
Thomas Jefferson	FY10	Sealing of vertical penetrations in the book stacks completed.
Thomas Jefferson	FY11	Book conveyor removal and building infrastructure repairs is currently in design. Expected design completion in FY12.
Thomas Jefferson	FY09	Design has begun for Smoke control systems including stair pressurization and smoke evacuation systems. The Program of Requirement documents completed. Estimated date of completion for the design FY12.
Thomas Jefferson	FY12	North Stair B design has been completed. 100% design documents submitted for the remaining three stairwells. Design completion in FY12.

Thomas Jefferson	FY09	Received design funding for emergency generator replacement in FY09. Design completion expected in FY11. Construction funding to be requested in FY13.
Thomas Jefferson	FY10	Completed Interim Safety Actions to improve egress from the Page School.
Thomas Jefferson	FY11	Completed construction on Phase I of visual notification appliance installation.
Thomas Jefferson	FY11	Construction on Phase I fire doors, replacement of non-historical doors to be completed in FY11.
Thomas Jefferson	FY12	Design for Fire Door Improvements of historically significant doors has begun. Design Completion expected in FY12.
James Madison	FY11	Start construction on emergency lighting upgrades. Project includes upgrades to exit signage throughout the building.
James Madison	FY09	Completed design of LOC Egress Improvements which addresses excessive common path issues. Construction funding was requested in FY12.
James Madison	FY09	Completed FM-200 installation in the Main Computer Room and Communications room replacing the Halon systems.
James Madison	FY10	Phase I ADA strobe installation for public assembly areas, corridors and restrooms completed.
James Madison	FY11	Book conveyor removal and infrastructure repairs is currently in design. Expected design completion in FY12.
James Madison	FY09	Design has begun for smoke control systems including upgrading existing smoke control systems and providing new smoke evacuation systems. The POR design documents have been submitted. Estimated completion for the design FY12.
James Madison	FY09	Emergency generator replacement currently in design.
James Madison	FY12	Construction for smoke detection upgrades is about 50% complete. Project completion in FY12.
James Madison	FY12	Construction for the second means of egress from the Madison 1 st floor atrium space has begun. Construction completion in FY12.
John Adams	FY12	Construction for three of the four stairwells in the ADA bathroom/storage room renovations project has been completed. Construction is scheduled to be completed for the fourth stairwell in FY12.
John Adams	FY09	Completed design of LOC Egress Improvements which addresses excessive common path issues. Construction funding was requested in FY12.
John Adams	FY09	Completed sprinkler upgrades throughout the building, to include full coverage of all areas.
John Adams	FY13	Construction funding for emergency lighting upgrades is being requested in the FY13 budget.
John Adams	FY12	Construction to begin in FY12 for monumental exterior exit door project.
John Adams	FY11	Book conveyor removal and building infrastructure repairs is currently in design. Expected design completion in FY12.
John Adams	FY09	Design has begun for smoke control systems including upgrading ventilation system serving the ground floor corridors to eliminate system return in the corridors and stair pressurization. Program of Requirement documents have been submitted. Estimated completion for the design FY12.
John Adams	FY12	Construction for smoke detection upgrades is about 55% complete. Project completion in FY12.
John Adams	FY12	Design of emergency generator to be completed in FY11. Construction funding to be requested in FY13.
John Adams	FY12	Construction to begin to provide two additional exits on the North side of the Adams building to increase building egress.

John Adams	FY12	Construction to be completed in FY12 to extend exit stair 6 to the Cellar level.
John Adams	FY12	Construction to be completed in FY12 to reactivate South exit on the ground floor in order to reduce travel distance to exit on the South stairs.
John Adams	FY11	Construction on Egress Improvements II project to be completed in FY11.
John Adams	FY10	Construction completed on return air system modifications, ground floor.
John Adams	FY11	Completed construction on Phase I of Visual notification appliance installation.
John Adams	FY12	Construction on Phase I fire doors, replacement of non-historical doors to be completed in FY12
John Adams	FY12	Design for Fire Door Improvements of historically significant doors has begun. Design Completion in FY12.

Table 2e: Office of Security Programs Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
67 K Street, SW	FY10	Installed a security gate to the fence line to provide additional emergency egress from the building.
USCP Headquarters	FY10	Reversed door swing of the First Floor Rear Stairwell door to allow for proper emergency egress.
Alternate Computer Facility	FY 11	Installed an ADA compliant exit ramp for the second emergency egress pathway from the North building .

Table 2f: U.S. Botanic Garden Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
USBG Administration Building	FY10	Completed installation of fire sprinkler system.
USBG Administration Building	FY10	Completed installation of smoke detectors.
USBG Administration Building	FY10	Completed emergency lighting upgrades.

Table 2g: Capitol Visitors Center Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Capitol Visitors Center	FY10	Enhancement to orientation films shown to all visitors prior to taking the Capitol tour: written safety instructions on exiting the theater and other logistics shown before and after the film. This improvement was added to enable individuals who can not hear to get critical instructions that are generally given verbally to audiences by Visitors Assistants.
Capitol Visitors Center	FY10	Large, attractive signage identifying main exits from the Visitor Center added to spaces near the exits. This has proven extremely helpful to all visitors who had difficulty indentifying the main exits from the overhead signage, New "MAIN EXIT" signs are also being developed for the upper hall bulkheads that visitors see when ascending the east staircases in Emancipation Hall.

Table 2h: Capitol Power Plant (CPP), Utility Distribution System (UDS) Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

During the 111th Congress, AOC reduced the total number of open Settlement Agreement findings, or unique hazard conditions, within the CPP UDS, from 1,798, to 895. Specific accomplishments include:

Building	Timeframe	Brief Description of Accomplishments
Capitol Power Plant (CPP), Utility Distribution System (UDS)	FY 09 – FY 10	Abatement of all ACM/PACM Thermal System Insulation in the R and O tunnels.
CPP and UDS	FY 09 – FY 10	Installation of the steam pipe and anchor repairs in the O tunnel.
CPP and UDS	FY 09 – FY 10	Installation of D.C. Fire & Rescue communication system upgrades.
CPP and UDS	FY 09 – FY 10	Installation of structural, electrical, lighting, ventilation and egress upgrades in the R, Y, B, V, G, CVC, and non-walkable tunnels.
CPP and UDS	FY 09 – FY 10	Design of egress improvements in the R and CVC tunnels.
CPP and UDS	FY 09 – FY 10	Design of Phase III concrete repairs in the R tunnel.
CPP and UDS	FY 09 – FY 10	Development of the following: tunnel-specific standard operating procedures; Emergency Action and Response Plan; Asbestos Operations and Maintenance Plan; long-term operations and maintenance support contract; and pipe integrity testing contract for the CPP UDS.
CPP and UDS	FY 09 – FY 10	Abatement of a variety of other hazards throughout the CPP UDS.
CPP and UDS	FY 09	In addition, on April 2, 2009, the OOC accepted the Notice of Corrective Action for Citation #24, Item #3; permit-required confined space hazards in the non-walkable tunnels.

Table 2i: Supreme Court of the United States Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

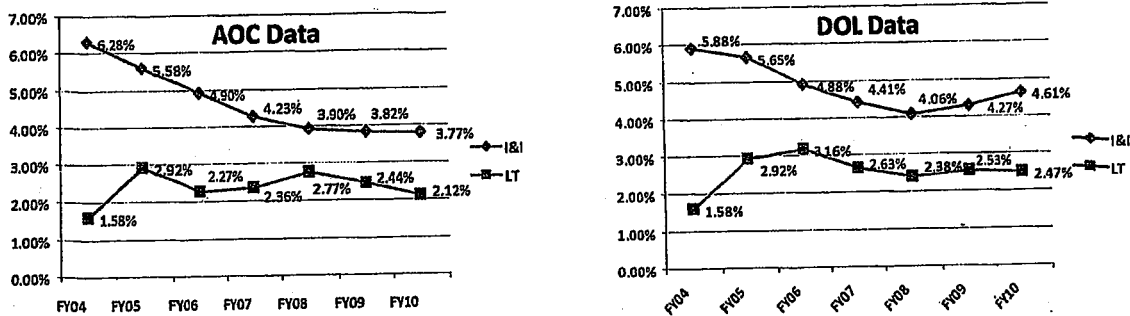
Building	Timeframe	Brief Description of Accomplishment
Supreme Court of the United States	FY 09 – FY 10	The additional of a full-time Safety Specialist has been most helpful with: <ul style="list-style-type: none"> • reviewing, developing and formally implementing safety standard operating procedures, and • developing an in-house safety training program for the employees.

C. Injury and Illnesses Information Update FY09 – FY10:

Annual Injury Rate Reductions Total 40% Since FY04

The AOC total injury and illness case rate was reduced from 3.90 to 3.77 injuries reported per 100 employees during the 111th Congress; a 3.33% reduction. The AOC lost time injury and illness case rate was reduced by 24.3%, from 2.77 in FY08 to 2.12 in FY10. Since FY04, our total injury rate has been reduced each year, resulting in an overall rate reduction of 40%.

Table 3: Historical AOC Injury and Illness Rates

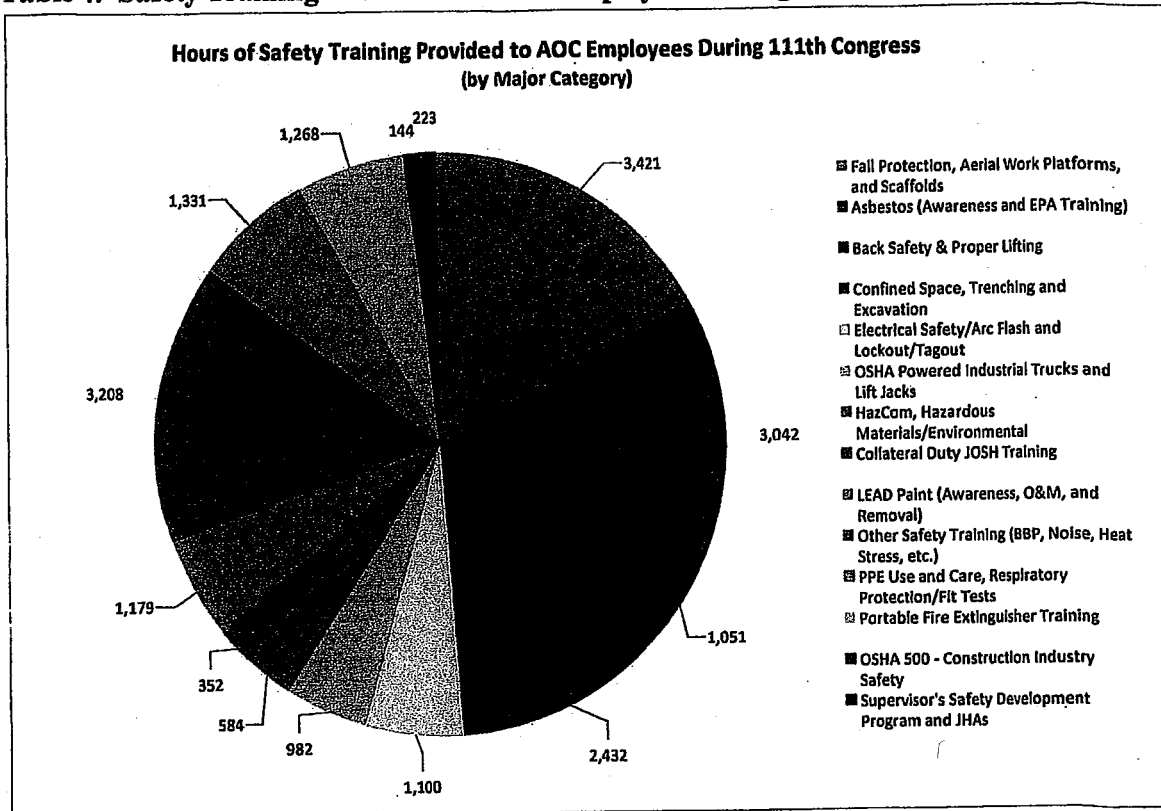


Note the difference between the AOC recordkeeping and U.S. Department of Labor (DOL) data. During the past, the AOC was reporting injury claims made (even non-reportable first-aid only claims) to the DOL for review and acceptance or denial. We have since learned that DOL recorded those reports in our claims data. The AOC has changed this practice and claims are being managed according to the reportable and DOL recordable nature of each individual claim.

Injuries Continue to be Reduced through Active Safety Training

Training was targeted at our blue color workforce (including laborers, custodians, and other skilled trades shop employees). This chart shows the hours of safety training by major category.

Table 4: Safety Training Provided to AOC Employees During the 111th Congress



D. Citation and Case Updates FY09 – FY 10:

11 Citation items and 21 OSH Cases were Closed During the 111th Congress

The AOC continues to work cooperatively with OOC to update, track, and pursue abatement and closure of pre-existing Citations and OSH Cases. The AOC believes that OOC opportunities remain and are being pursued for improving timeliness of reporting findings and recording abatements. Additionally, the AOC continues to contest or dispute the OOC's application of Risk Assessment Codes (RACs) to present non-compliance issues, as opposed to as a measure of risk as they were intended.

The AOC continues to collaborate towards mutually beneficial improvements in these areas and has most recently participated in technical discussions with the OOC. AOC's emphasis in monitoring and closing OSH Findings, Cases, and Citations has continued during the 111th Congress, as presented in the following tables 1 through 3:

Table 5: Closure Record for AOC Cases and Citations during the 111th Congress

AOC	# Closed Pre- 111 th Congress	# Closed During 111 th Congress	Comments
OSH Cases	148	21	Since 1998, only 16 of the 185 total OSH Cases remain open.
OSH Citation Items	71	11	Of 40 OSH Citations (with 97 total items), 82 items have been closed and 15 items remain open

AOC continues to submit comprehensive update packages, including Notices of Corrective Action (NOCA) and Requests for Modification of Abatement (RFMA), for open Citations. AOC and OOC continue to work together to evaluate complex fire and life safety issues, develop abatement plans and programming, and accelerate abatement where feasible.

E. Findings from the 111th Biennial Inspections:

78% of 2,835 Biennial Inspection Findings for Major Congressional Office Buildings Were Closed, Contested or Re-assigned During the 111th Congress

Table 7: Status of Findings Generated During the 111th Biennial Inspections

Jurisdiction	Building	# AOC findings	% Closed, Contested or Re-Assigned
U.S. Capitol	US Capitol	98	81%
House Office Buildings	Cannon	97	87%
	501 1 st Street	7	100%
	Longworth	122	97%
	E Street Garage	7	100%
	Rayburn	227	97%
	Ford	192	97%
	House Page Dorm	12	100%
	East Underground Garage	13	100%
	West Underground Garage	47	98%
	Senate Office Buildings	Hart Building	154
Dirksen Building		133	29%
Russell Building		132	44%
Webster Page Dorm		4	100%
Senate Child Care		2	100%
Senate Underground Garage		53	2%
Postal Square		4	75%
Library of Congress Buildings	Thomas Jefferson	373	93%
	John Adams	222	88%
	James Madison	355	92%
	Ft Meade	73	100%
	Saint Cecilia's D.C.	6	83%
	67 K Street	10	90%
Office of Security Programs	Alternate Computer Facility	24	96%
	Fairchild Building	10	100%
	USCP Headquarters	20	100%
	Offsite Delivery Center	7	100%
	Kiosks/Miscellaneous	5	100%
	Total		2,835

All is Data as of August 2011 unless otherwise noted
 N/A – Not Applicable



Safety, Fire, and Environmental Programs Office
 Ford House Office Building, Room H2-571
 Washington, DC 20515

www.aoc.gov

September 6, 2011

Mr. Peter Ames Eveleth
 General Counsel
 Office of Compliance
 110 Second Street, SE
 Room LA-200, John Adams Building
 Washington, D.C. 20540-1999

Subject: Response to Ms. Susan Green's Letter dated July 20, 2011, transmitting the "DRAFT Safety & Health in the Congressional Workplace – Report on the 111th Congress Biennial Occupational Safety and Health Inspections"

Dear Mr. Eveleth:

This letter is written to provide comment on the OOC's *DRAFT Safety & Health in the Congressional Workplace Report on the 111th Congress Biennial Occupational Safety & Health Inspections* ("Draft Report") as requested in Ms. Susan Green's letter of July 20, 2011.

It is with pleasure that I provide AOC's safety related accomplishments during the 111th Congress, see enclosure 1. Safety is top priority at AOC. Since FY2007, Congress has invested over \$ 210 million in more than 55 fire, life and occupational safety projects to improve the safety of the buildings and people entrusted to our care. As you can see in enclosure 1 and as discussed below, significant progress has been made in a number of areas.

The Draft Report provides a good description of the challenges faced by the Legislative Branch. While AOC appreciates the Office of Compliance's attempts to recognize progress, it is unfortunate the Draft Report's Overview does not provide a more balanced view of the overall state of safety today, and does not clearly articulate the tremendous progress being made across the Legislative Branch.

The news is **great: all indicators show an improvement in safety**. Eleven AOC citations and 21 AOC Occupational Safety and Health Cases were closed¹. Requests for Inspection have decreased across the Legislative Branch. Biennial inspection findings have decreased, AOC findings declined by 40%. Seventy Eight percent of AOC findings are now closed².

As your report indicates on page 12, "In short, safety and health conditions in the legislative workplaces continue to improve." In fact, **the level of safety and health within legislative workplaces has never been higher**. As discussed below, it is unfortunate this perspective is not better highlighted.

¹ Not mentioned in the Draft Report. See Enclosure 1, Tables 5 and 6.

² See Enclosure 1, Table 7.

Additional examples of a lack of balanced perspective include:

- 1) The Draft Report fails to acknowledge that over the years AOC has submitted Requests for Modification of Abatement to extend fire safety citation abatement schedules and OOC has approved those requests³.
- 2) The Draft Report fails to acknowledge that a substantial number of fire safety citations have been abated. Of the 97 citation items issued to AOC since 1998, 82 are closed and 45 of those closed related to fire safety⁴.
- 3) Fire sprinkler and unprotected exit route hazards are the 8th and 9th most common hazards. This is described as a “disturbing development”⁵. Although these moved to the “Top Ten” list, have the number of overall findings in these two categories increased? If not, why is this represented as a disturbing development? Both these findings require substantial funding and time to abate, where the majority of previous “Top Ten” categories (e.g. electrical cords, panels, covers, outlets/switches, fire extinguishers, electrical plugs, etc.) were much quicker and easier to abate.
- 4) The Draft Report implies that the OOC inspection program is driving the campus safety program, and that employing offices will not take proactive safety measures⁶ unless forced by legislation. As you know, the AOC performs extensive tracking and analysis of injuries and illnesses, including the Chief Operating Officer’s monthly review of AOC’s critical performance metrics with senior managers. Our injury data trends are provided to your office every Congress⁷ and more detailed analysis was presented to OOC at least twice during the 111th Congress. Additionally, injury rate data is publicly available on OSHA’s website. While we welcome your independent perspective on inspections and investigations, the primary responsibility for safety and prevention of injury and illness rests with employing offices. Please remember that any OOC request for refinement of data comes with a price of both time and resources from the AOC.
- 5) It is not appropriate to mention or include 111th Biennial Supreme Court inspection findings in the report. OOC has acknowledged failure to transmit any 111th Supreme Court findings to AOC.

In regard to the Blue Ribbon Panel, I object to reference to and/or release of Blue Ribbon Panel Report contents. As you know, the Blue Ribbon Panel Report was commissioned by the Senate Committee on Rules and Administration (Rules Committee)⁸. Therefore, the Rules Committee is the owner of the report and the only entity authorized to release the report. Additionally, the report was developed presuming the contents would not be made public⁹. It contains technical information AOC considers inappropriate for public release, information of a sensitive nature that could impact the safety and security of Legislative Branch employees and visitors. Lastly, Ms. Tamara Chrisler, OOC Executive Director testified¹⁰ that, “The report is not ours to make public.”

³ Draft Report, pgs 3-4, section 1. Fire Safety on Capitol Hill and footnote 5.

⁴ Of the 15 citation items remaining open, 7 are utility tunnel related and 8 are fire safety related.

⁵ Draft Report, pg 12; section 2. Inspection Findings.

⁶ Draft Report, pgs 13-15 section 4.

⁷ See Enclosure 1, Table 3.

⁸ Rules letter transmitted to OOC by AOC on May 14, 2009.

⁹ AOC considers communication with committees privileged, see S. Adams March 22, 2011 letter to OOC on OSH 2009-02.

¹⁰ Ms. Tamara Chrisler’s testimony to the House of Representatives Committee on Transportation and Infrastructure September 30, 2010.

In addition to objecting to the release of the report, I strongly encourage you to refrain from quoting a verbal comment, taken out of context, not vetted with the speaker, and not included in the final written Blue Ribbon Panel Report. The page 4 description of Mr. Ed Plaughter's April 6, 2010 statement is a grossly misleading misrepresentation of Mr. Plaughter's statement and lacks due diligence. Enclosure 2 is an email from Mr. Plaughter providing his actual statements.

As mentioned above, significant progress has been made in a number of facility related efforts. As the Draft Report describes, "... significant progress in reducing [utility tunnel] hazards by means of egress installation, concrete and structural improvements, ventilation system installation, and electrical and lighting upgrades"; "...virtually all the exit stairways in the Longworth House Office Building have been enclosed"¹¹; "...significant progress [has been made] in reducing hazards by means of egress installation, concrete and structural improvements, ventilation system installation and electrical and lighting upgrades"¹²; sprinkler and smoke detector coverage "...are at or near 100% coverage"¹³. A number of other improvements have been made, a comprehensive list is provided in Enclosure 1.

Additional detailed comments are provided in Enclosure 3.

Thank you for allowing AOC the opportunity to review and comment on the draft. In keeping with previous responses, the Architect will provide a separate letter for inclusion in the final report. Given the magnitude and serious nature of AOC comments on the first draft, the Architect is withholding formal comment at this time, pending response to this letter and/or opportunity to review and comment on a second draft.

Please do not hesitate to contact me at 202.226.0630 if you would like additional information or to discuss this matter further.

Sincerely,



Susan P. Adams
Director of Safety, Fire and Environmental Programs

Enclosures:

- 1) AOC Significant Accomplishments in Occupational Safety and Health – 111th Congress
- 2) E. Plaughter email of August 9, 2011
- 3) AOC Comments to the OOC's Draft 111th Biennial OSH Report

¹¹ Draft Report, pg 7.

¹² Draft Report, pg 8, Section 2.

¹³ Draft Report, pg 8 Section 1b understates sprinkler and smoke detector coverage, see Enclosure 1.

**AOC Significant Accomplishments
In Occupational Safety and Health (OSH)
111th Congress**

**A. Building Sprinkler and Smoke Detection System Coverage Statistics
FY09 -- FY10:**

Table 1: August 2011 Status of Smoke Detection and Sprinkler Coverage in Congressional Office, Daycare and Dormitory Buildings

Jurisdiction	Building	% Sprinkler Coverage	% Smoke Detector Coverage	Comments
U.S. Capitol	US Capitol	30%	100%	Sprinkler installation will be performed as part of Capitol Master Plan implementation. Smoke detector installation is complete.
House Office Buildings	Cannon	100%	100%	Additional areas identified during installation and inspections completed in FY 11.
	Longworth	99%	100%	Smoke detection installation completed in FY10. Sprinkler installation to be performed as funding and client schedules permit.
	Rayburn	100%	100%	None
	Ford	100%	100%	None
	House Page Dorm	100%	100%	None
Senate Office Buildings	Hart Building	98%	20%	HSOB Fire Alarm Upgrade completion Phase 1 FY11, Phase 2 FY17; HSOB Modular Furniture Upgrade completion FY12; HSOB Attic sprinklers completed FY10.
	Dirksen Building	95%	85%	Phase II Basement and Sub-Basement sprinkler system complete.
	Russell Building	97%	80%	RSOB Attic sprinkler complete; RSOB Sprinklers (throughout) completion FY11.
	Webster Page Dorm	100%	100%	Fire alarm system replacement completed FY10.
	Senate Child Care	100%	100%	Fire alarm system replacement completed FY09.
	Senate Underground Garage	100%	100%	SUG Fire Alarm installation completed FY09; SUG sprinklers completion FY12.
	Subway Tunnels	0%	0%	Sprinkler completion FY12, Fire Alarm completion FY17.

Jurisdiction	Building	% Sprinkler Coverage	% Smoke Detector Coverage	Comments
Library of Congress Buildings	Thomas Jefferson	97%	100%	1) Phase 1 sprinkler upgrades completed 2009. Phase 2 System Expansion construction is underway with sprinklers completed on the 2 nd floor and in attic spaces. Ground Floor work expected to be complete 2011; 2) Smoke detection has been installed throughout the building. Acceptance testing completed in 2009.
	John Adams	100%	90%	1) Adams sprinkler systems upgrades completed in 2009; 2) Construction on smoke detector installation has begun. Approximately 55% of the work is complete.
	James Madison	100%	90%	1) Sprinkler protection has been provided throughout the building since 2007; 2) Construction on smoke detector installation has begun. Approximately 50% of the work is complete.
	Ft Meade Module 1	100%	100%	
	Ft Meade Warehouses	0%	100%	As of Aug 2007
	Saint Cecelia's D.C.	40%	100%	100% in occupied spaces.
Office of Security Programs (Owned)	US Capitol Police Headquarters	100%	100%	Smoke detector coverage is reported as zone coverage.
	USCP Canine Facility	100%	100%	Smoke detector coverage is reported as zone coverage. Trailers are not included.
	USCP Interim Offsite Delivery Facility	100%	0%	Does not include trailers. Does not include vehicle inspection tent.
	USCP Kiosks (57 total)	0%	0%	
	Alternate Computer Facility	100%	100%	
Office of Security Programs (Leased)	Fairchild Building	100%	100%	100% sprinkler protected as per code, including dead areas, i.e., electrical closets. USCP and AOC occupy floors 1, 2, 3, 5, 7 and 8.
	GPO	100%	100%	USCP occupies space on the First and Third floors.
	67 K Street, SW	98%	98%	All occupied areas are fully covered with smoke detection and sprinklers. The basement, with two small rooms (not occupied), is not sprinkler protected and does not contain smoke detectors.

B. Fire and Life Safety Building Feature Improvements FY09 – FY10:

Table 2a: U.S. Capitol Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Timeframe	Brief Description of Accomplishment
FY10	Installation of a Redundant Fire Pump on the Senate Side of the Capitol.
On-going	West Grand Stair Enclosure (Coordinating with Leadership to receive approval to proceed).
On-going	Installation of Smoke Control System in Four Grand Stairs (Engineered Equivalency to Stair Enclosure): Design completed. Construction award expected by first quarter FY12. 12 month project construction duration.
On-going	West Front Egress Stair (Design Complete: Funding will be requested in the FY16 Budget Submission).
On-going	Egress Modifications to Old Senate/Supreme Court Chambers (Design Complete: Funding will be requested in the FY15 Budget Submission).
On-going	Senate Attic Egress Stair (Design Modifications Underway: Construction funding will be requested in the FY15 Budget Submission)
On-going	Installation of a New Addressable Fire Alarm Detection and Notification System (Design underway with expected completion in the 2 nd Quarter of FY12)
Master Plan	Building Sprinkler Coverage (30% complete: 100% Completion dependent on Capitol Building Master Plan Implementation)

Table 2b: House Office Buildings Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
HOB-wide	Ongoing	Installing a central fire alarm monitoring system for all House Office Buildings.
Cannon	FY10	Corrected doors swing deficiencies on Basement Floor of Stairwells 5, 6, and 7.
Cannon	FY10	Modifications to Roof Fall Protection System.
Cannon	FY10	Replaced existing smoke detectors in Member Suites.
Cannon	FY10	Installed heat detection and sprinkler protection throughout all elevator machine rooms.
Cannon	FY10	Installed emergency generator power to both fire pumps.
Cannon	FY10	Completed Alternative Egress Design to improve exiting arrangements.
Cannon	FY10	Completed design to install fire rated horizontal exits throughout building to close out open Stairwell Citation. Construction funding requested in FY12.
Cannon	FY10	Provided ADA compliant Men's and Women's restrooms on the 5 th Floor.
Rayburn	FY09	UL Field Listed 37 Stairwell doors on the Garage and Sub-Basement Levels to close out Open Stairwell Citation.
Rayburn	FY10	Completed Prescriptive Egress Design to improve exiting arrangements.
Rayburn	FY10	Upgraded fire alarm visual notification system to more than double capacity.
Rayburn	Ongoing	Upgrading emergency lighting and exit signs throughout entire building. Planned completion date is FY11.
Longworth	FY09	Installed ADA compliant handrails along both ramps between Longworth and Rayburn and along South ramp between Longworth and Cannon.
Longworth	FY09	Installed redundant fire pump.
Longworth	FY09	Upgraded emergency lighting and exit signs throughout entire building.

Building	Timeframe	Brief Description of Accomplishment
Longworth	FY09	Completed design for new addressable fire alarm system.
Longworth	Ongoing	Currently installing fire rated walls at all stairwell landings to close out open Stairwell Citation. Planned completion date is FY11.
Longworth	FY10	Installed emergency generator power to both fire pumps.
Ford	FY09	Completed installation of sprinkler system in data and telecom rooms.
House Page Dorm	Ongoing	Design underway for new addressable fire alarm system.

Table 2c: Senate Office Buildings Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Hart	FY09-FY10	Modular Furniture Upgrade sprinkler modifications.
Hart	FY10	Attic Sprinkler System completed.
Hart	FY10	MER Sprinkler Protection completed.
Russell	FY10	Blue Ribbon Panel Report completed.
Russell	FY010	Exterior handrail construction completed.
Russell	FY09	Additional Egress Capacity completed (SW corner, 1 st floor).
SUG	FY10	Sprinkler installation completed.
SUG	FY10	Fire alarm installation completed.
SECCC	FY09	Installation of New Fire Alarm System completed.
SECCC	FY09	Emergency Generator Completed.
DWPD	FY09	Emergency Generator Completed.

Table 2d: Library Buildings and Grounds Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Thomas Jefferson	FY09	100% Coverage of smoke detection provided.
Thomas Jefferson	FY07	Completed design for Emergency Lighting Upgrades. Construction funding requested in FY13.
Thomas Jefferson	FY11	Sprinkler installation Phase II construction to be completed in 2011. Phase III construction funding was requested as part of FY12 budget.
Thomas Jefferson	FY09	Stair interrupters installed in all exit stairs at the level of exit discharge.
Thomas Jefferson	FY08	Stair signage installed in all exit stairs.
Thomas Jefferson	FY10	Sealing of vertical penetrations in the book stacks completed.
Thomas Jefferson	FY11	Book conveyor removal and building infrastructure repairs is currently in design. Expected design completion in FY12.
Thomas Jefferson	FY09	Design has begun for Smoke control systems including stair pressurization and smoke evacuation systems. The Program of Requirement documents completed. Estimated date of completion for the design FY12.
Thomas Jefferson	FY12	North Stair B design has been completed. 100% design documents submitted for the remaining three stairwells. Design completion in FY12.

Thomas Jefferson	FY09	Received design funding for emergency generator replacement in FY09. Design completion expected in FY11. Construction funding to be requested in FY13.
Thomas Jefferson	FY10	Completed Interim Safety Actions to improve egress from the Page School.
Thomas Jefferson	FY11	Completed construction on Phase I of visual notification appliance installation.
Thomas Jefferson	FY11	Construction on Phase I fire doors, replacement of non-historical doors to be completed in FY11.
Thomas Jefferson	FY12	Design for Fire Door Improvements of historically significant doors has begun. Design Completion expected in FY12.
James Madison	FY11	Start construction on emergency lighting upgrades. Project includes upgrades to exit signage throughout the building.
James Madison	FY09	Completed design of LOC Egress Improvements which addresses excessive common path issues. Construction funding was requested in FY12.
James Madison	FY09	Completed FM-200 installation in the Main Computer Room and Communications room replacing the Halon systems.
James Madison	FY10	Phase I ADA strobe installation for public assembly areas, corridors and restrooms completed.
James Madison	FY11	Book conveyor removal and infrastructure repairs is currently in design. Expected design completion in FY12.
James Madison	FY09	Design has begun for smoke control systems including upgrading existing smoke control systems and providing new smoke evacuation systems. The POR design documents have been submitted. Estimated completion for the design FY12.
James Madison	FY09	Emergency generator replacement currently in design.
James Madison	FY12	Construction for smoke detection upgrades is about 50% complete. Project completion in FY12.
James Madison	FY12	Construction for the second means of egress from the Madison 1 st floor atrium space has begun. Construction completion in FY12.
John Adams	FY12	Construction for three of the four stairwells in the ADA bathroom/storage room renovations project has been completed. Construction is scheduled to be completed for the fourth stairwell in FY12.
John Adams	FY09	Completed design of LOC Egress Improvements which addresses excessive common path issues. Construction funding was requested in FY12.
John Adams	FY09	Completed sprinkler upgrades throughout the building, to include full coverage of all areas.
John Adams	FY13	Construction funding for emergency lighting upgrades is being requested in the FY13 budget.
John Adams	FY12	Construction to begin in FY12 for monumental exterior exit door project.
John Adams	FY11	Book conveyor removal and building infrastructure repairs is currently in design. Expected design completion in FY12.
John Adams	FY09	Design has begun for smoke control systems including upgrading ventilation system serving the ground floor corridors to eliminate system return in the corridors and stair pressurization. Program of Requirement documents have been submitted. Estimated completion for the design FY12.
John Adams	FY12	Construction for smoke detection upgrades is about 55% complete. Project completion in FY12.
John Adams	FY12	Design of emergency generator to be completed in FY11. Construction funding to be requested in FY13.
John Adams	FY12	Construction to begin to provide two additional exits on the North side of the Adams building to increase building egress.

John Adams	FY12	Construction to be completed in FY12 to extend exit stair 6 to the Cellar level.
John Adams	FY12	Construction to be completed in FY12 to reactivate South exit on the ground floor in order to reduce travel distance to exit on the South stairs.
John Adams	FY11	Construction on Egress Improvements II project to be completed in FY11.
John Adams	FY10	Construction completed on return air system modifications, ground floor.
John Adams	FY11	Completed construction on Phase I of Visual notification appliance installation.
John Adams	FY12	Construction on Phase I fire doors, replacement of non-historical doors to be completed in FY12
John Adams	FY12	Design for Fire Door Improvements of historically significant doors has begun. Design Completion in FY12.

Table 2c: Office of Security Programs Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
67 K Street, SW	FY10	Installed a security gate to the fence line to provide additional emergency egress from the building.
USCP Headquarters	FY10	Reversed door swing of the First Floor Rear Stairwell door to allow for proper emergency egress.
Alternate Computer Facility	FY 11	Installed an ADA compliant exit ramp for the second emergency egress pathway from the North building .

Table 2f: U.S. Botanic Garden Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
USBG Administration Building	FY10	Completed installation of fire sprinkler system.
USBG Administration Building	FY10	Completed installation of smoke detectors.
USBG Administration Building	FY10	Completed emergency lighting upgrades.

Table 2g: Capitol Visitors Center Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

Building	Timeframe	Brief Description of Accomplishment
Capitol Visitors Center	FY10	Enhancement to orientation films shown to all visitors prior to taking the Capitol tour: written safety instructions on exiting the theater and other logistics shown before and after the film. This improvement was added to enable individuals who can not hear to get critical instructions that are generally given verbally to audiences by Visitors Assistants.
Capitol Visitors Center	FY10	Large, attractive signage identifying main exits from the Visitor Center added to spaces near the exits. This has proven extremely helpful to all visitors who had difficulty indentifying the main exits from the overhead signage, New "MAIN EXIT" signs are also being developed for the upper hall bulkheads that visitors see when ascending the east staircases in Emancipation Hall.

Table 2h: Capitol Power Plant (CPP), Utility Distribution System (UDS) Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

During the 111th Congress, AOC reduced the total number of open Settlement Agreement findings, or unique hazard conditions, within the CPP UDS, from 1,798, to 895. Specific accomplishments include:

Building	Timeframe	Brief Description of Accomplishments
Capitol Power Plant (CPP), Utility Distribution System (UDS)	FY 09 – FY 10	Abatement of all ACM/PACM Thermal System Insulation in the R and O tunnels.
CPP and UDS	FY 09 – FY 10	Installation of the steam pipe and anchor repairs in the O tunnel.
CPP and UDS	FY 09 – FY 10	Installation of D.C. Fire & Rescue communication system upgrades.
CPP and UDS	FY 09 – FY 10	Installation of structural, electrical, lighting, ventilation and egress upgrades in the R, Y, B, V, G, CVC, and non-walkable tunnels.
CPP and UDS	FY 09 – FY 10	Design of egress improvements in the R and CVC tunnels.
CPP and UDS	FY 09 – FY 10	Design of Phase III concrete repairs in the R tunnel.
CPP and UDS	FY 09 – FY 10	Development of the following: tunnel-specific standard operating procedures; Emergency Action and Response Plan; Asbestos Operations and Maintenance Plan; long-term operations and maintenance support contract; and pipe integrity testing contract for the CPP UDS.
CPP and UDS	FY 09 – FY 10	Abatement of a variety of other hazards throughout the CPP UDS.
CPP and UDS	FY 09	In addition, on April 2, 2009, the OOC accepted the Notice of Corrective Action for Citation #24, Item #3; permit-required confined space hazards in the non-walkable tunnels.

Table 2i: Supreme Court of the United States Egress and other Fire and Life Safety Building Feature Improvements FY09 – FY10

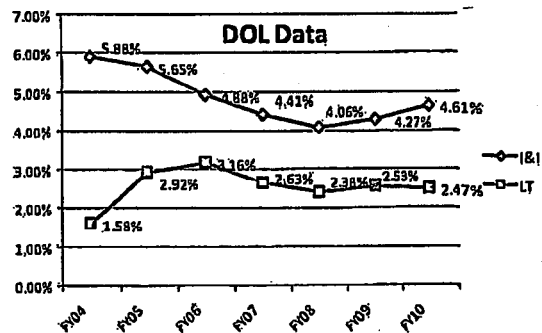
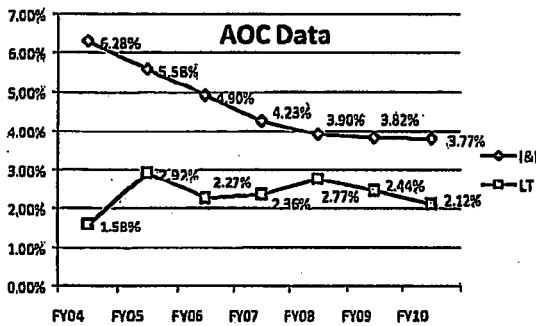
Building	Timeframe	Brief Description of Accomplishment
Supreme Court of the United States	FY 09 – FY 10	The additional of a full-time Safety Specialist has been most helpful with: <ul style="list-style-type: none"> • reviewing, developing and formally implementing safety standard operating procedures, and • developing an in-house safety training program for the employees.

C. Injury and Illnesses Information Update FY09 – FY10:

Annual Injury Rate Reductions Total 40% Since FY04

The AOC total injury and illness case rate was reduced from 3.90 to 3.77 injuries reported per 100 employees during the 111th Congress; a 3.33% reduction. The AOC lost time injury and illness case rate was reduced by 24.3%, from 2.77 in FY08 to 2.12 in FY10. Since FY04, our total injury rate has been reduced each year, resulting in an overall rate reduction of 40%.

Table 3: Historical AOC Injury and Illness Rates

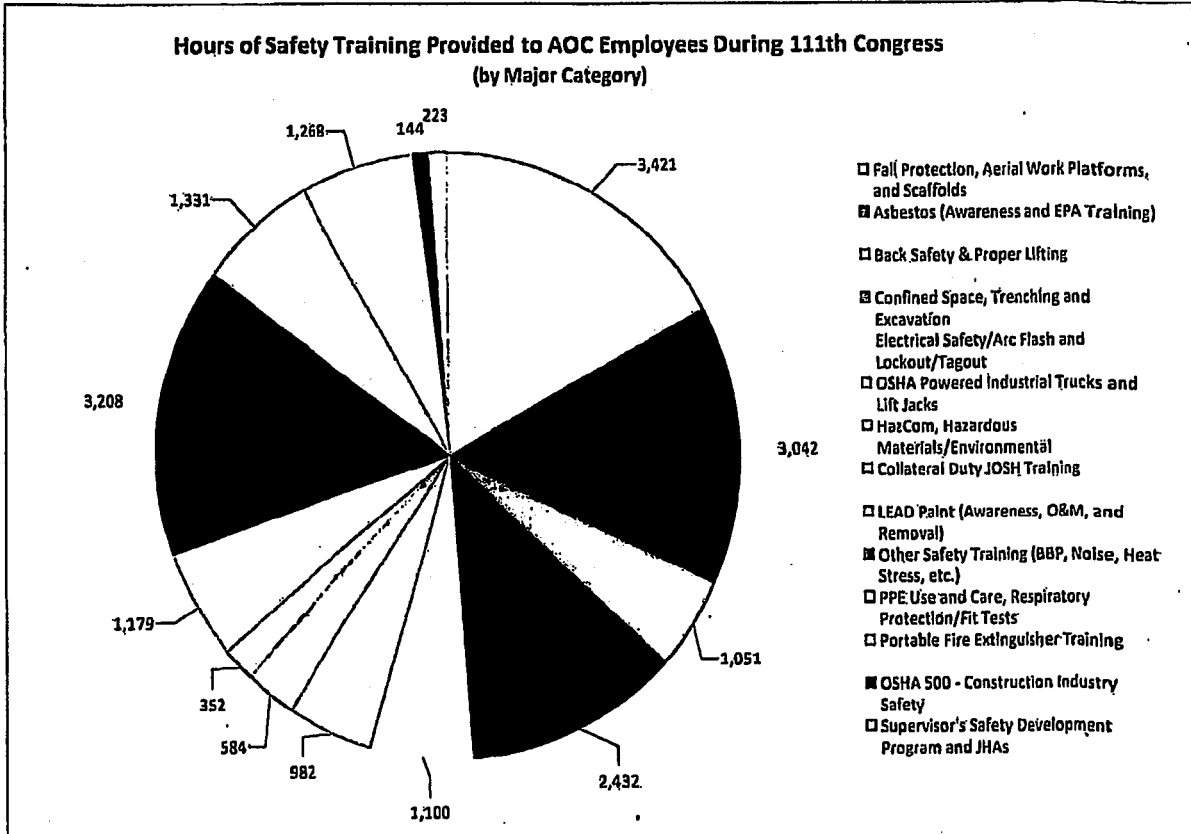


Note the difference between the AOC recordkeeping and U.S. Department of Labor (DOL) data. During the past, the AOC was reporting injury claims made (even non-reportable first-aid only claims) to the DOL for review and acceptance or denial. We have since learned that DOL recorded those reports in our claims data. The AOC has changed this practice and claims are being managed according to the reportable and DOL recordable nature of each individual claim.

Injuries Continue to be Reduced through Active Safety Training

Training was targeted at our blue color workforce (including laborers, custodians, and other skilled trades shop employees). This chart shows the hours of safety training by major category.

Table 4: Safety Training Provided to AOC Employees During the 111th Congress



D. Citation and Case Updates FY09 – FY 10:

11 Citation items and 21 OSH Cases were Closed During the 111th Congress

The AOC continues to work cooperatively with OOC to update, track, and pursue abatement and closure of pre-existing Citations and OSH Cases. The AOC believes that OOC opportunities remain and are being pursued for improving timeliness of reporting findings and recording abatements. Additionally, the AOC continues to contest or dispute the OOC's application of Risk Assessment Codes (RACs) to present non-compliance issues, as opposed to as a measure of risk as they were intended.

The AOC continues to collaborate towards mutually beneficial improvements in these areas and has most recently participated in technical discussions with the OOC. AOC's emphasis in monitoring and closing OSH Findings, Cases, and Citations has continued during the 111th Congress, as presented in the following tables 1 through 3:

Table 5: Closure Record for AOC Cases and Citations during the 111th Congress

AOC	# Closed Pre- 111 th Congress	# Closed During 111 th Congress	Comments
OSH Cases	148	21	Since 1998, only 16 of the 185 total OSH Cases remain open.
OSH Citation Items	71	11	Of 40 OSH Citations (with 97 total items), 82 items have been closed and 15 items remain open

AOC continues to submit comprehensive update packages, including Notices of Corrective Action (NOCA) and Requests for Modification of Abatement (RFMA), for open Citations. AOC and OOC continue to work together to evaluate complex fire and life safety issues, develop abatement plans and programming, and accelerate abatement where feasible.

E. Findings from the 111th Biennial Inspections:

78% of 2,835 Biennial Inspection Findings for Major Congressional Office Buildings Were Closed, Contested or Re-assigned During the 111th Congress

Table 7: Status of Findings Generated During the 111th Biennial Inspections

Jurisdiction	Building	# AOC findings	% Closed, Contested or Re-Assigned
U.S. Capitol	US Capitol	98	81%
House Office Buildings	Cannon	97	87%
	501 1 st Street	7	100%
	Longworth	122	97%
	E Street Garage	7	100%
	Rayburn	227	97%
	Ford	192	97%
	House Page Dorm	12	100%
	East Underground Garage	13	100%
	West Underground Garage	47	98%
	Senate Office Buildings	Hart Building	154
Dirksen Building		133	29%
Russell Building		132	44%
Webster Page Dorm		4	100%
Senate Child Care		2	100%
Senate Underground Garage		53	2%
Postal Square		4	75%
Library of Congress Buildings	Thomas Jefferson	373	93%
	John Adams	222	88%
	James Madison	355	92%
	Ft Meade	73	100%
	Saint Cecilia's D.C.	6	83%
Office of Security Programs	67 K Street	10	90%
	Alternate Computer Facility	24	96%
	Fairchild Building	10	100%
	USCP Headquarters	20	100%
	Offsite Delivery Center	7	100%
	Kiosks/Miscellaneous	5	100%
Total		2,835	78%

All is Data as of August 2011 unless otherwise noted
 N/A – Not Applicable

From: Edward Plaugher [mailto:EPlaugher@iafc.org]
Sent: Tuesday, August 09, 2011 12:07 PM
To: Wong-Wittmer, Marilyn; Enrique A. Bellini; 'mbuck@kcct.com'; James A. Milke
Cc: Morey, Robin; Kayon, Michelle; Franz, Anna
Subject: RE: BRP Statement in OOC Report

The statement was "I would if Fire Marshal issue an order to abate the hazards immediately", i.e., as soon as possible, and "that the RSOB was indeed a safe structure and that I did not feel unsafe while in the RSOB". Those concerns for the hazardous processes in the RSOB are in the Blue Ribbon Report.

Edward P. Plaugher
Assistant Executive Director
International Association of Fire Chiefs
National Programs and Consulting Services
4025 Fair Ridge Drive, Suite 300
Fairfax, VA 22033

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(In response to Ms. Susan Green's letter dated July 20, 2011)

GENERAL COMMENTS:

- 1) All mention of the Blue Ribbon Panel Report (BRP) should be removed. The Senate Committee on Rules and Administration is the owner of the Blue Ribbon Panel and the only entity authorized to release the report. Additionally, the report was developed presuming the contents would not be made public. It contains technical information AOC considers inappropriate for public release, information of a sensitive nature that could impact the safety and security of Legislative Branch employees and visitors. Lastly, Ms. Tamara Chrisler, OOC Executive Director testified that, "The report is not ours to make public."
- 2) Due to the late publication date of the Draft Report, 112th Congress accomplishments and future plans are mixed with those of the 111th Congress – presenting a less than fully accurate view of 111th Congress accomplishments.
- 3) The Draft Report fails to mention that the Office of Compliance closed 11 AOC citations and 21 AOC OSH Cases during the 111th Congress.
- 4) OOC is encouraged to review Enclosure 3 for AOC's significant accomplishments.
- 5) Through-out the Draft Report and the Appendices, the construction of Risk Assessment Code (RAC) numbers is inconsistent, e.g., RAC II versus RAC 2.
- 6) In some cases, in both the Draft Report and in the Appendices, there is no discussion or reference about how pictures might relate to the text, or vice versa. In other cases, the captions of pictures seem to be out-of-sync with the pictures. There is also reference to a picture, when no picture exists.
- 7) Review all pictures to make certain that they are not Law Enforcement Sensitive.
- 8) Abbreviations such as GFCI (Ground Fault Circuit Interrupter) are used without explanation.
- 9) Through-out the Draft Report, there is inconsistent use of square footage numbers. In one case, there is a reference to "18 million square feet;" and in the following paragraph on the same issue, the Draft Report refers to over "17.25 million square feet."
- 10) It should be explained somewhere in the text, or in each Appendix B, that the AOC is likely to have a larger percentage of inspection findings, due to the AOC's role of facility manager.
- 11) The continued focus on numbers of findings without normalization¹ does not necessarily provide an accurate assessment of safety. Without normalization, the inspection changes made during the 112th Congress will result in an inability to compare findings between Congress' in the future.
- 12) Employing offices continued to face challenges due to lack of timely transmittal of biennial report findings, confusion over responses received/entered into the OOC tracking system, and a lack of OOC responsiveness to contested findings.
- 13) The number of inaccuracies and errors, especially in Appendices B findings figures, is concerning. A careful review of all data and calculations is needed.
- 14) The Draft Report covers more than the 111th Congress Biennial Inspections. You may want to broaden the title to be more reflective of content.

¹ See Mr. Ayers' letters to Mr. Eveleth dated May 12, 2009 and November 2, 2007

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PAGE 2:

- 1) Many statistics are provided regarding Member Office inspections, awards, and the OOC's decision to stop Member-related efforts in the 112th Congress. This level of detail information is not provided elsewhere in the report. Inclusion in the Overview is self-serving.

PAGE 3:

- 1) The Draft Report raises a "critically important" activity for "comprehensive fire prevention plans"². As of the date of this letter, OOC has not yet discussed this "critically important" activity with AOC.
- 2) Section 1, first paragraph, second sentence – what does the number "7-9" refer to? *pages*
- 3) Section 1, first paragraph, second sentence – while the text notes that the time for abating hazards has "long since expired," the OOC has reviewed and approved the AOC's submittal of Requests for Modification of Abatement, and multiple extensions thereof, for each outstanding Citation.

PAGE 4:

- 1) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: the Draft Report's characterization of Mr. Plaughter's statement is grossly misleading and lacks due diligence.
- 2) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: Section 1.a., Paragraph 3 – the Draft Report notes that the Blue Ribbon Panel (BRP) Final Report recommended the creation of temporary fire zones. This is not accurate. The BRP Final Report presented Immediate, Short and Long Term recommendations, as well as design options to address Citation 19. None of these recommendations included provision of temporary fire zones. Fire zones were recommended in Design Option 2.

PAGE 5:

- 1) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: Third paragraph – although the BRP Report speaks to provision of pocket doors as a means to provide fire separation, it does so in the context that such doors are less architecturally intrusive than cross-corridor doors. The Draft Report makes clear that the BRP recommends compartmentation, but such compartmentation could be achieved through various methods of fire resistive construction, including pocket doors or cross corridor doors.
- 2) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: Second and third paragraph – the OOC indicates Design Option 2 would meet

² Draft Report, pg 3, Section: The Bad News

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all of the life safety objectives when it only meets 5 of 8 life safety objectives. Further, this design option only provides partial improvements.

- 3) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: Fourth Paragraph – the OOC indicates the BRP Report recommended design options should be implemented “along with” the Senate Alternative Life Safety Approach (SALSA). This is not accurate. The BRP Report indicates that the OOC can implement one of the design options, or SALSA.

PAGE 6:

- 1) AOC objects to inclusion of or reference to the Blue Ribbon Report. If OOC persists in inclusion: Second bullet – the Draft Report states that Design Option 1 does not address the building's lack of exit capacity or excessive travel distances. This is not completely accurate. The BRP Report notes that Design Option 1 improves risks associated with various fire scenarios, however it falls short of Design Option 2 in the level of protection provided.

PAGE 7:

- 1) Section b, Fire and Life Safety... Paragraph 1, last sentence – replace with the following sentence; “AOC has requested the funding to complete fire separation of the Cannon Building and is prepared to execute the project when funds are appropriated.
- 2) Section b, Paragraph 2 – Point of clarification to the whole Paragraph: The AOC has not been granted full authority to proceed with installing self-closing fire doors to divide the Capitol in three sections, on the basement, third and fourth floor levels. U.S. Capitol Building management is still seeking authorization.

PAGE 8:

- 1) First paragraph – the Draft Report notes that the Capitol, the Senate Office Buildings, and parts of the Library of Congress still require significant additions to sprinkler and smoke detection systems. This is not accurate. While the Capitol is still at 30% automatic sprinkler coverage, it is protected by near 100% smoke detection. The Senate Office Buildings are over 95% protected by automatic sprinklers, with all but the Hart Building over 85% protected by smoke detection. At the Library of Congress, the Jefferson, Adams and Madison buildings are at or near 100% sprinkler coverage, and above 90% smoke detection coverage. On-going projects are underway to improve even these levels of coverage.
- 2) Second paragraph, Capitol Power Plant Utility Tunnels: the description of settlement agreement requirements is less than complete.
- 3) Third paragraph, Capitol Power Plant Utility Tunnels:
 - a) There is no mention of the citations approved by your office.
 - b) As currently written, the Draft Report gives the impression that AOC does not require additional funds. Request the following sentence be deleted: “The work required to fulfill the requirements of the settlement has been funded and

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obligated." As you are aware, AOC requires FY12 funding for program management and other efforts.

PAGE 9:

- 1) The pictures starting on Page 9, and continuing on Page 10: captions do not have a designator that references them cleanly to the text, for example, Picture A, Picture B, etc.

PAGE 10:

- 1) Second paragraph – this paragraph contains dated material, see suggested corrections in the Appendix B for the Capitol Visitor Center.
- 2) Third paragraph – the numbers of findings do not agree.

PAGE 11:

- 1) "Inspection Scope and Process" Section:
 - a) First and second paragraphs – note that the AOC was not the only facility management office who accompanied the OOC inspectors.
 - b) Second paragraph, third sentence – incremental closing conferences began in the middle of the 111th Biennial, but written closing conferences did not begin in earnest until the 112th Biennial inspections.
 - c) Second paragraph, fourth sentence – written reports from closing conferences are utilized to give jurisdictional leadership ideas about trends. Hazard Reports and Serious Deficiency Needing Immediate Attention Form, are more useful for developing and implementing preventative measures.
- 2) Last paragraph, carrying over to Page 12 – regarding the "contest" process, OOC's tracking of and response to contested finding continues to be problematic. Increased vigilance paid to the correct assignment of findings, at the time of identification, continues to be more fruitful.

PAGE 12:

- 1) "Inspection Findings" Section, first paragraph, last sentence – should be moved to the very first sentence of the "The Good News" section of the Draft Report.

PAGES 13 through 15:

- 1) The Draft Report implies that the OOC inspection program is driving the campus safety program, and that employing offices will not take proactive safety measures³ unless forced by legislation. As you know, the AOC performs extensive tracking and analysis of injuries and illnesses, including the Chief Operating Officer's monthly review of AOC's critical performance metrics with senior managers. Our injury data trends are provided to

³ Draft Report, pgs 13-15 section 4.

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your office every Congress and more detailed analysis was presented to OOC at least twice during the 111th Congress. Additionally, injury rate data is publicly available on OSHA's website. While we welcome OOC's independent perspective on inspections and investigations, the primary responsibility for safety and prevention of injury and illness rests with employing offices. Please remember that any OOC request for refinement of data comes with a price of both time and resources from the AOC.

- 2) "Employing Office Safety Initiatives" Section – to be more equitable, this section should list all Employing Offices' safety initiatives, not just those that have received awards issued by the OOC. Or, perhaps the section should be re-titled to indicate "Award Winning Initiatives."

PAGE 16:

- 1) "Requestor-Initiated Inspection Cases" Section – timely reports and responses to these cases by the OOC remain a challenge. For one particular case, which was initiated by the OOC in July of 2010, the formal report from the OOC was not delivered until March of 2011. The AOC still takes great efforts to protect the safety and health of its employees, even when the investigation and reporting are protracted.

PAGE 17, 18, and 19: No comments.

APPENDIX B — THE U.S. CAPITOL BUILDING:

- 1) "Ongoing Fire Safety Issues" Section:
 - a) There is only one citation for the U.S. Capitol Building.
 - b) The following sentence is in error and should be deleted: "Further work is being delayed until decisions are made by the Blue Ribbon Panel Report concerning fire and life safety improvements in the Russell Building." The Blue Ribbon Panel Report will not make decisions. While there are some efforts on hold pending the notice to proceed from Leadership, we have not suspended all further work since the completion of the two fire-rated exit discharge enclosures on the west basement wall level. We abated the deficiencies on Stairs H9 and S9 by installing new self-closing fire doors, fire rated frames and transoms. We have also validated and labeled the fire doors on the 3rd and 4th levels of the stairs located near the Senate Curators Space (Room S411). Additionally, we are moving forward with the project for the installation of the Smoke Purge System for the four grand stairs on the House and Senate Sides of the Capitol. We expect award of this contract in the 1st quarter of FY12. We continue to meet with Congressional Leadership to gain approval to proceed with other efforts related the Citation 16. We are hoping to gain approval in the near future to proceed with the Compartment Barrier and Horizontal Exit project. The remaining efforts will continue to be reviewed with Congressional Leadership as required to gain approval to fully abate Citation 16 for the U.S. Capitol.

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- c) "Ongoing Fire Safety Issues" Section, second paragraph – update the paragraph:
"Design is complete on the Smoke Purge project. The construction award is expected by the 1st quarter of FY12. Construction duration is 12 months."
- 2) "Exposure to Electrical Shock" Section – update the last sentence of the paragraph: "The two prong outlets have been replaced with three prong, grounded outlets."
- 3) "Fall Protection" Section – add an update at the end of the second sentence of the paragraph: "Fabrication of the handrail for the British Stairwell is underway. The installation of the handrail is projected to be completed by September 2, 2011."

APPENDIX B — THE CAPITOL POWER PLANT:

- 1) The Capitol Power Plant has taken significant actions to address the enumerated paragraphs – as opposed to just the few examples noted in the "Substantial Improvements" paragraph on page 3 on the Appendix. Other improvements include:
- 2) The Emergency Action and Response Plan was updated to include operational shutdowns. A tabletop exercise was conducted for catastrophic utility outage. ISO 14001 development and full chemical inventory was completed. Sound testing and sound posting with hearing requirements for all plant locations. After defining the root cause of near misses or incidents, the staff is retrained with either face-to-face, or online, safety courses. Generation plant self audits are conducted twice a year. Safety days and plant cleanups are held twice per year. Safety videos twice per month. Distribution tunnel inspections are conducted every week. Jurisdiction - Customer interfaces within the distribution system were established to resolve safety and operational issues quickly. Steam traps and expansion joints were standardized to best-in-class to minimize steam leakage. Safety awards are recommended by the Safety Committee. Emergency Action and Response Plan plans have been finalized. Emergency failures have been defined in desktop working group.

APPENDIX B — THE U.S. CAPITOL VISITOR CENTER:

- 1) There is an error in the "Summary" statement regarding the U.S. Capitol Visitor Center. The following sentence: "*The CVC center portion has an auditorium, two theaters (one for the House presentation and the other for the Senate presentation) and a restaurant that can serve over 250 people;*" should read: "The CVC public area has two orientation theaters which each seat approximately 250 visitors, and a restaurant that can serve more than 400 people. Additionally, a 16,500-square-foot Exhibition Hall houses two small theaters which seat approximately 40 people. Another portion of this space is reserved for the use of Members of Congress and their guests and includes two large meeting rooms and the Congressional Auditorium, which seats approximately 450 people."
- 2) Regarding "Picture 2: Fire Door Latch is Taped Open" – the tape has been removed from the locker room doors (SVC324 and SVC311), and these doors now are opened via cipher locks. They are no longer taped.

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- 3) "111th Congress Inspection Findings for the Capitol Visitor Center" Section:
 - a) First paragraph – what is the relevance of, "Sixty-four of the findings were assigned to the AOC to address."?
 - b) Second paragraph – at the end of the first sentence, the last word should be "classification."
 - c) Second paragraph – the following issues have been updated: "Confined Space" signs have been installed; space heaters replaced with units with tip-over switches; the noted hazardous chemical container has been properly labeled; and machine guarding issues have been corrected.
 - d) Second paragraph, third sentence – fire door hazards should either be listed as a quantity of 20, or be defined as 42% of [what?] figure, but not both – without further explanation.
 - e) Third paragraph – Pictures 4, 5, and 6 are missing.

APPENDIX B — THE GOVERNMENT ACCOUNTABILITY OFFICE: No comments.

APPENDIX B — THE HOUSE OF REPRESENTATIVES:

- 1) "House Page School" Section, in the Summary paragraph, note in parentheses that the facility, while administered by the House of Representatives, is located in the Thomas Jefferson Building of the Library of Congress.
- 2) "House Page School" Section, in the Summary paragraph:
 - a) When discussing connecting subways, add the Cannon Tunnel to the Capitol.
 - b) When discussing cafeterias and coffee shops, the Cannon Building also has a carry-out.
 - c) When noting the credit unions, there are facilities in the Longworth, the Ford and the Rayburn Buildings.
 - d) The last sentence adds more confusion that it does clarification. Issues with House spaces in the CVC should be listed in the CVC Appendix, just as issues with House spaces in the U.S. Capitol Building should be listed in the U.S. Capitol Building Appendix.
- 3) "House Page School" Section, in the 111th Congressional Inspection Findings: Fourth paragraph – the paragraph begins with a discussion of electrical issues, and ends with a discussion of water and GFCIs. GFCIs are noted again in the third paragraph on Page 2. For clarity's sake, perhaps GFCIs should be discussed in a separate paragraph, and the statistics reconciled in another.

APPENDIX B — THE LIBRARY OF CONGRESS:

- 1) In the Summary Section, second and third paragraphs: the correct name for AOC's facility management organization is the Library Buildings and Grounds jurisdiction.
- 2) "Architect of the Capitol – Library Buildings and Grounds Findings" Section – the number of findings in the text do not match the number in Figure 2.

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- 3) Page 2, second paragraph – the Draft Report states that the James Madison Building lacks smoke detectors in most occupied spaces. The James Madison Building is protected by smoke detection throughout approximately 90% of its area. Furthermore, smoke detection is not required under OSHA standards for this building. AOC has installed such detection to improve overall fire safety in the facility, while the Draft Report, as written, seems to indicate that lack of complete smoke detection is a deficiency.
- 4) Page 2, third paragraph. The Draft Report states that doors in the John Adams Building are secured by magnetic locks that cannot be opened in a non-fire emergency. This is inaccurate, as push-button door release hardware is provided adjacent to exit doors for use in emergencies other than fires.
- 5) "Library of Congress Findings" Section – no comments, was not reviewed by the AOC.
- 6) Page 9 – the pictures, and picture labels, are out-of-sync.

APPENDIX B — THE OFFICE OF SECURITY PROGRAMS:

- 1) In the Summary Section:
 - a) First paragraph – add the phrase "portions of" in front of "the Government Printing Office;"
 - b) First paragraph – is the phrase "a secure site in Virginia," a law enforcement sensitive issue?
 - c) First paragraph – should "Currier" be corrected to read "Courier?"
 - d) Second paragraph – the inspection data noted in the first sentence must be from the 110th inspection, it shows 174 findings. The text and Figure 2 show 87 findings for the 111th. The paragraph needs to be re-constructed to convey the information more clearly.
- 2) The very last paragraph – there is a reference to one RAC 1 finding, but the chart on the first page doesn't show any RAC 1's.
- 3) The very last paragraph – the Office Security Programs has had a self-inspection program in place for at least the last three calendar years.

APPENDIX B — THE SENATE FACILITIES: No comments.

APPENDIX B — THE U.S. SUPREME COURT (SCUS) – Legislative Branch Occupied Spaces:

- 1) Although the AOC-SCUS was inspected during the 111th Biennial Congressional Inspections, a report was never issued by the OOC to the AOC. As such, official report of safety findings never happened. This did not give the AOC-SCUS the right of due process in review or to contest possible findings from this inspection. Without these findings, proper correction could not be made. The AOC-SCUS had multiple times attempted to obtain a report of this inspection but no response was received. The failure to provide this report was confirmed at the time of the closing conference of the 112th Congressional Inspection at the AOC-SCUS.

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- 2) The AOC-SCUS performs its own bi-annual inspection. This is performed by the AOC-SCUS Safety Specialist. Identified safety concerns are issued as findings using the AOC internal safety management software, and corrections made as needed.
- 3) As there was no report issued, data obtained from the 111th Congressional Inspection of AOC-SCUS should not be used in the OOC Report to Congress.

APPENDIX B — THE BOTANIC GARDEN: No comments.

APPENDIX B — THE UNITED STATES CAPITOL POLICE: No comments.