

Office of Compliance

Memorandum

To: Covered Employing Offices and Other Stakeholders
 From: David K. Young, Management/Program Analyst
 Re: Revised Inspection Procedures and Calendar

Date: March 26, 2009

This is to advise you of changes we are making in the sequencing of OSH/ADA biennial inspections of legislative branch facilities during the 111th Congress. These revisions are the result of changed circumstances described below and differ from the order of inspections discussed during meetings with employing offices in January 2009, and at the OSH/ADA Working Group Meeting on January 28, 2009. The proposed inspection schedule for 2009 is attached.

Initially, we had planned to: (1) first inspect those building areas most likely to contain operations potentially posing the highest risk of serious hazards, such as machine shops, etc. Subsequently, we would complete the building inspection in offices and other potentially less hazardous areas; (2) conduct inspections of safety procedures and programs mandated by OSH regulations, such as confined spaces, HazCom, etc.; (3) implement a new system of recording findings at the site of the inspection to enable OGC to provide faster notice of high risk RAC 1 and RAC 2 hazard findings and to provide employing office on-line access to findings stored on a secure system hosted at a remote site by OOC's contractor, Zoldak, Inc.; and (4) inspect the status of open citations and RAC I and RAC II hazards identified in prior biennial inspections.

- (1) Recently, I have learned from various employing offices of certain limitations that preclude sequencing of their inspections in the manner originally proposed. Therefore, we are unable to first inspect high risk hazards within buildings followed by subsequent inspections of lower risk areas, as initially planned.
- (2). The original plan was to conduct a comprehensive inspection during this biennial inspection of employing office safety procedures that are mandated by OSHA regulations; however, for a variety of reasons, while we may conduct limited target inspections of safety procedures during the 111th Congress, we have decided to delay undertaking a comprehensive

inspection of such procedures until the 112th Congress. Instead, we have offered to provide technical assistance to employing offices during the 111th Congress with respect to the development and implementation of their procedures. As requests are received, we will work with employing offices to schedule the provision of such assistance, consistent with our resources.

- (3) In view of questions raised by some stakeholders, the OGC has decided to delay implementation of an online tracking database in order to provide adequate time to work with interested stakeholders to develop a secure and effective tool to transmit information to the employing offices in a time efficient manner. Consequently, this office will not be able to provide employing offices with a list of continuing or newly identified RAC 1 and RAC 2 hazards as quickly as had been anticipated until such time as the online system can be implemented. In any event, we will continue to provide a list of findings to the employing offices in the same manner as we did during the 110th Congress. Each employing office will receive a *Hazard Summary Report* with a CD with an electronic copy of the *Report*, as well as an MS Excel file of the findings and an *Abatement Response Sheet*.
- (4) During the 111th Congress, the OGC will conduct comprehensive wall-to-wall inspections of all covered facilities. As part of this inspection, we intend to conduct a thorough review of open citations and RAC 1 and RAC 2 findings. The inspection team(s) will also be looking for new ways of streamlining the inspection process for future inspections. This will enable us to determine whether sufficient progress has been made in safety conditions to focus on more targeted inspections in the future. Recommendations from the inspection team will be fully evaluated and, as warranted, incorporated in the inspection plans for the 112th Congress.

Attached is a copy of the proposed inspection schedule for 2009. The schedule includes Member Offices in the House of Representatives and Senate, shop spaces in various buildings, garages, public entry areas and security posts, pedestrian tunnels, administrative and support facilities, warehouses, production facilities, the Botanic Gardens. The OOC will work with the employing offices to cover spaces in the Thomas Jefferson Building which were not covered as part of the inspection conducted in March 2009.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday		
January 2009								
				1	2	3		
4	5	6	7	8	9	10		
11	12	13	14	15	16	17		
18	19	20	21	22	23	24		
25	26	27	28	29	30	31		

Su	unday Monday	Tuesday	Wednesday	Thursday	Friday	Saturday				
		0000								
	February 2009									
1	2	3	4	5	6	7				
8	9	10	11	12	13	14				
O	3	10		12	13	14				
15	16	17	18	19	20	21				
22	23	24	25	26	27	28				

S	unday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday		
1	March 2009								
1		2	3	4	5	6	7		
8		9 Thomas Jefferson Building	10 Thomas Jefferson Building	11 Thomas Jefferson Building	12 Thomas Jefferson Building	13 Thomas Jefferson Building	14		
15		16 Thomas Jefferson Building	17 Thomas Jefferson Building	18 Thomas Jefferson Building	19 Thomas Jefferson Building	20 Thomas Jefferson Building	21		
22		23	24	25	26	27	28		
29		30	31						

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Apri	1 200	9				
			1	2	3	4
5	6 House Member Offices	7 House Member Offices	8 House Member Offices	9 House Member Offices	10 House Member Offices	11
12	13 House Member Offices	14 House Member Offices	15 House Member Offices	16 House Member Offices	17 House Member Offices	18
19	20	21	22	23	24	25
26	27	28	29	30		

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
May	/ 2009	9			1	2
3	4	5 East and West Underground Garages incl. Shops	6 East and West Underground Garages incl. Shops	7 East and West Underground Garages incl. Shops	8 East and West Underground Garages incl. Shops	9
10	11	12	13	14 United States Supreme Court Spaces	15	16
17	18 USCP Entry Spaces and Break rooms	19 USCP Entry Spaces and Break rooms	20 USCP Entry Spaces and Break rooms	21 USCP Entry Spaces and Break rooms	22 USCP Entry Spaces and Break rooms	23
24	25	26 Pedestrian Tunnels across Campus	27 Pedestrian Tunnels across Campus	28 Pedestrian Tunnels across Campus	29 Pedestrian Tunnels across Campus	30
31						

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
June	e 200	9				
	1	2	3	4	5	6
7	8	9	10 Fairchild Building	11 Eney, Chestnut, Gibson Building and Courier Acceptance	12 K Street Garage	13
14	15	16	17 Cheltenham Facility	18 USCP Blue Plains Facility	19 USCP Blue Plains Facility and K Street Garage	20
21	22	23	24 USCP Fort Meade	25 LOC Book Modules at Fort Meade	26 LOC Book Modules at Fort Meade	27
28	29	30				

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
July	2009)				
			1	2	3	4
5	6	7 Botanic Garden Conservatory and Admin Building	8 Botanic Garden Production Facility and Construction Management	9 Senate Daycare and Page School/Dormitory	10 LOC Daycare	11
12	13	14	15	16	17	18
19	20	21	22	23 LOC's Taylor Street	24 LOC's Landover Annex	25
26	27	28	29	30	31	

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Aug	ust 20	009				1
2	3 House and Senate Member Offices	4 House and Senate Member Offices	5 House and Senate Member Offices	6 House and Senate Member Offices	7 House and Senate Member Offices	8
9	10 House and Senate Member Offices	11 House and Senate Member Offices	12 House and Senate Member Offices	13 House and Senate Member Offices	14 House and Senate Member Offices	15
16	17 House and Senate Member Offices	18 House and Senate Member Offices	19 House and Senate Member Offices	20 House and Senate Member Offices	21 House and Senate Member Offices	22
23	24 House and Senate Member Offices	25 House and Senate Member Offices	26 House and Senate Member Offices	27 House and Senate Member Offices	28 House and Senate Member Offices	29
30	31					

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday		
September 2009								
		1	2	3	4	5		
6	7	8 House AOC Shop Spaces	9 House AOC Shop Spaces	10 House AOC Shop Spaces	11 House AOC Shop Spaces	12		
13	14	15 House AOC Shop Spaces	16 House AOC Shop Spaces	17 House AOC Shop Spaces	18 House AOC Shop Spaces	19		
20	21	22 House AOC Shop Spaces	23 House AOC Shop Spaces	24	25	26		
27	28	29	30					

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Octo	ober 2	2009				
				1	2	3
4	5	6 Senate AOC Spaces	7 Senate AOC Spaces	8 Senate AOC Spaces	9 Senate AOC Spaces	10
11	12	13 Senate AOC Spaces	14 Senate AOC Spaces	15 Senate AOC Spaces	16 Senate AOC Spaces and Senate Underground Garage	17
18	19	20 Senate GPO Warehouse	21 Senate Mail Handling Facility (Landover)	22 Postal Square	23 Postal Square	24
25	26 Postal Square (as needed)	27	28	29	30	31

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Nov	embe	er 200)9			
1	2	3	4	5	6	7
8	9 John Adams Building	10 John Adams Building	11 Columbus Day No Inspections	12 John Adams Building	13 John Adams Building	14
15	16 John Adams Building	17 John Adams Building	18 John Adams Building	19 John Adams Building	20 John Adams Building	21
22	23 John Adams Building	24 John Adams Building	25 John Adams Building	26 Thanksgiving No Inspections	27 No Inspections	28
29	30 John Adams Building					

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday		
December 2009								
		1 John Adams Building	2 John Adams Building	3 John Adams Building	4 John Adams Building	5		
6	7	8	9	10	11	12		
13	14	15	16	17	18	19		
20	21 House/Senate Members (as needed)	22 House/Senate Members (as needed)	23 House/Senate Members (as needed)	24	25	26		
27	28 House/Senate Members (as needed)	29 House/Senate Members (as needed)	30 House/Senate Members (as needed)	31				