

October 1992

OCCUPATIONAL SAFETY AND HEALTH

Uneven Protections Provided to Congressional Employees



147784



Human Resources Division

B-249659

October 2, 1992

The Honorable William F. Goodling
Ranking Minority Member
Committee on Education and Labor
House of Representatives

The Honorable Thomas E. Petri
The Honorable Marge Roukema
The Honorable Steve Gunderson
The Honorable Richard K. Armey
The Honorable Harris W. Fawell
The Honorable Paul B. Henry
The Honorable Cass Ballenger
The Honorable Susan Molinari
The Honorable Bill E. Barrett
The Honorable John A. Boehner
The Honorable Scott L. Klug
The Honorable Mickey Edwards
The Honorable Randy "Duke" Cunningham
House of Representatives

In response to your May 13, 1992, request, this report provides information on the workplace safety and health protections for employees of selected congressional offices and the Government Printing Office (GPO). You asked whether the protections afforded these workers are the same as those provided, under the Occupational Safety and Health Act of 1970, for private sector workers and for other federal workers. Specifically, you asked us to (1) determine whether there are safety and health programs and structures in place to protect congressional workers and (2) review the working conditions in some of these workplaces. As agreed with your staff, we selected four congressional offices and one independent legislative branch agency, GPO, for this review.¹ The four congressional offices were the Office of the Architect of the Capitol, the Office of the Attending Physician, and the Offices of the Clerk and the Doorkeeper of the House of Representatives.

To determine whether safety and health programs and structures are in place, we interviewed congressional and GPO officials regarding their general efforts to protect workers against safety and health hazards and reviewed documentation they provided. We asked about specific jobs in

¹The legislative branch consists of the Congress and its independent agencies. In addition to GPO, these agencies include the Congressional Budget Office, the Copyright Royalty Tribunal, the General Accounting Office (GAO), the Library of Congress, and the Office of Technology Assessment.

their workplaces likely to involve significant risk of injury or illness because of the equipment used or the processes performed. We also reviewed the act's provisions for private sector workers and federal government workers.

To review working conditions, we had safety and health specialists under contract to GAO conduct safety and health audits of congressional workplaces. Science Applications International Corporation (SAIC)² conducted safety and health audits at judgmentally selected workplaces in each of the selected congressional offices and GPO. These audits assessed whether (1) safety and health programs and practices were consistent with regulations set by the Occupational Safety and Health Administration (OSHA) and (2) workplace programs and practices adequately protected workers. The work involved discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and reviews of available safety and health documents.

The safety and health audits encompassed 25 worksites in GPO and the four congressional offices we selected for review. The worksites were as follows:

- 10 shops, 2 supply rooms, and 2 construction sites of the Architect of the Capitol;
- 4 first aid rooms of the Office of the Attending Physician;
- the Publications Distribution Service (commonly called the Folding Room) of the House Doorkeeper;
- 3 shops of the House Clerk's Department of Office Furnishings; and
- GPO's Quality Control and Technical Department, Press Division, and Binding Division.

See appendix I for further details on our objectives, scope, and methodology.

Results in Brief

Our safety and health consultants found work conditions and practices that represented serious hazards in all the congressional offices we visited except the Office of the Attending Physician; they also found serious hazards at GPO. Examples of these hazards, which have a substantial probability of causing serious physical harm to workers, include improper

²This is a research and development company providing scientific expertise in a variety of areas, including safety and health. Its staff of industrial hygienists and safety specialists prepare safety and health programs and conduct safety and health audits and inspections for federal agencies and private sector employers.

placement of automatic sprinklers, unenforced protections in areas of excessive noise levels, exposed blades on power saws and machines, poor ventilation where flammable materials were being used, and missing or improper labels on chemicals.

Employees in congressional offices are not covered by the Occupational Safety and Health Act, and no one office has full responsibility for ensuring their workplace safety and health. For example, while the Architect of the Capitol is responsible for the structure and maintenance of congressional buildings, which includes matters related to safety and health, the heads of other congressional offices—such as the Clerk of the House and the Doorkeeper of the House—are responsible for protecting their employees from hazards related to the performance of their work. Some offices have voluntarily implemented some aspects of a comprehensive safety and health program.

Employees of legislative agencies, such as GPO, are covered by the act in the same way employees of other federal agencies are covered. As required of all federal agencies, legislative agencies must have a comprehensive safety and health program. However, OSHA has no authority to evaluate the effectiveness of legislative (or judicial) agencies' programs or to inspect their workplaces, as it does for executive agencies. GPO has a program that meets the act's requirements.

Background

The Congress enacted the Occupational Safety and Health Act of 1970 with the goal of ensuring "so far as possible every working man and woman in the Nation safe and healthful working conditions." The act authorizes the Department of Labor to set standards and regulations governing workplace safety and health and to enforce employers' compliance with them and the act. The Secretary of Labor established OSHA to administer the act.

Under the act, federal agencies and private sector employers are responsible for providing working conditions and workplaces that are free from recognized hazards that cause or are likely to cause serious physical harm or death to workers.³ To accomplish this, the act requires the head of each federal agency to develop and implement a comprehensive and

³For federal agencies, this responsibility is most clearly described in Executive Order 12196. This order, issued on February 26, 1980, prescribes safety and health responsibilities of executive branch agencies and OSHA. Because the President does not have administrative authority over legislative and judicial agencies, the requirements mandated in the Executive Order for executive agencies do not apply to these agencies.

effective occupational safety and health program that is consistent with OSHA standards. Private sector employers are not required by the act to have safety and health programs, but OSHA encourages them to have programs because of their duty to provide hazard free workplaces.

Safety and health programs are management systems for overseeing and controlling safety and health in the workplace. OSHA regulations, adopted to implement Executive Order 12196, prescribe for executive branch agencies the elements of a comprehensive program. OSHA guidelines, issued in 1989, assist private sector employers who are interested in voluntarily developing safety and health programs. The basic program elements suggested in the guidelines for employers in the private sector are essentially the same as the basic elements required for executive agencies. As described by OSHA, the elements are (1) detailed self-inspection of all workplaces for all existing and potential hazards, (2) a written plan addressing the nature of the hazards at the workplace and the means to abate these hazards, (3) safety and health training for employees, and (4) employee participation in the development and implementation of the program.⁴

OSHA's enforcement role is different for employers in the private sector and for federal agencies. In the private sector, OSHA's enforcement activities include inspecting workplaces (which may be in response to an employee's complaints about hazards), issuing citations, levying penalties to employers who are out of compliance with OSHA safety and health standards, and confirming that employers correct the identified hazards. OSHA monitors federal agencies' safety and health programs, however, through analyses of agencies' annual reports on the status of their programs as well as—for federal agencies in the executive branch—evaluations of agencies' programs and inspections of individual workplaces for compliance with the act and its regulations.⁵

On May 28, 1992, the House Committee on Education and Labor approved H.R. 3160, the Comprehensive Occupational Safety and Health Reform Act. The bill, if enacted, would put employees of the executive, judicial, and legislative branches, except congressional offices, under OSHA jurisdiction in the same manner as private sector employees. To protect employees of the House and the Office of the Architect of the Capitol, the bill would

⁴For additional information about safety and health programs, see *Occupational Safety & Health: Worksite Safety and Health Programs Show Promise* (GAO/HRD-92-68, May 19, 1992).

⁵For more information, see *Occupational Safety and Health: Improvements Needed in OSHA's Monitoring of Federal Agencies' Programs* (GAO/HRD-92-97, Aug. 28, 1992).

require the Committee on House Administration of the House of Representatives to establish and maintain an effective and comprehensive safety and health program.

On September 16, 1992, the Senate Committee on Labor and Human Resources approved a similar bill, S. 1622. The Senate bill redefines "employer" in the act to include the U.S. government. It would, thus, put employees of the executive, judicial, and legislative branches, including congressional employees, under OSHA jurisdiction.

Principal Findings

Hazardous Working Conditions and Practices Found in Congressional Offices and GPO

In their safety and health audits of four congressional offices and GPO, our consultants found many work conditions and practices that were hazardous. At GPO and each of the congressional offices, except the Office of the Attending Physician, they found hazards that they believe OSHA would classify as "serious," that is, hazards where there is a substantial probability that serious physical harm could result. At all of the offices and GPO, they also found other conditions and practices that, although hazardous, they believe OSHA would classify as "other-than-serious."

The kinds of serious safety and health hazards our consultants observed are summarized in table 1. A more detailed summary is shown in appendix II, and the complete safety and health audit reports for GPO and each congressional office are presented in appendixes IV through VIII. The OSHA standards covering the safety and health hazards found during our audits are cited in appendix III.

Table 1: Serious Safety and Health Hazards at Congressional Offices and GPO

Serious Hazard	Architect of the Capitol	Office of the Attending Physician	Department of Office Furnishings	Folding Room	GPO
Improperly located sprinklers			X		
No program on accidental starting of electrical equipment	X			X	
No program on chemical hazards	X		X		
Unenforced program on hearing protection	X			X	X
Eating and drinking in laboratory areas					X
No/improper machine guarding	X			X	X
Inadequate means of exit	X			X	
No eye wash station	X			X	
Unsafe electrical equipment				X	
Improper storage of hazardous materials			X		
No written respiratory protection program	X		X		
No training on entering confined spaces	X				

Diffused Responsibility for Protecting Safety and Health of Employees in Congressional Offices

Congressional offices are not covered by the Occupational Safety and Health Act. They are not required to develop and implement safety and health programs or to comply with OSHA's standards. Also, OSHA has no authority to inspect their workplaces to identify safety and health hazards and require their abatement.

No one congressional office or official has full responsibility—either by statute or by House rules—for protecting the safety and health of employees of the congressional offices we reviewed. The heads of these offices share safety and health responsibilities with the Architect of the Capitol.

The Office of the Architect of the Capitol has responsibilities that affect, in significant ways, the occupational safety and health of congressional employees. The Architect is in charge of the structural and mechanical care and maintenance of congressional buildings including the Capitol, the House office buildings, and the Library of Congress buildings. This responsibility includes correcting hazardous conditions related to structural and mechanical problems. Component units and shops—construction, carpentry, sheet metal, machine, custodial, paint, electrical, and others—under the jurisdiction of the Architect carry out these functions. The Architect is also responsible for making all necessary

repairs to equipment and purchasing all equipment other than office equipment.

The Architect's Division of Safety Engineering conducts safety inspections of the Architect's facilities to identify and correct safety hazards. The Architect's inspectors inspect other offices' facilities for safety problems if requested by those offices.

Officials in the other congressional offices we reviewed told us that they are responsible for protecting their employees from hazards associated with the work of those offices, but not with hazards associated with the building itself; the repair and maintenance of the buildings is the responsibility of the Architect of the Capitol. For example, the Office of the Clerk of the House is responsible for protecting employees of its Department of Office Furnishings from exposure to hazardous materials used in their work areas and from unguarded or improperly guarded machines, such as power saws, sanders, and planers. Likewise, the Office of the Doorkeeper of the House is responsible for hazards affecting employees working in the Folding Room. Employees in the Folding Room operate heavy duty folding and inserting machines that are inherently loud and are dangerous if not properly guarded.

The sharing of safety and health responsibilities between independent offices may result in employees being exposed to unsafe working conditions because hazards are not recognized or recognized hazards are not corrected. For example, the Director of the Folding Room is responsible for protecting his employees who work with materials that can cause injuries to their eyes, whereas the Architect is responsible for installing and maintaining eye wash stations (emergency facilities for quick flushing of injurious materials from the eyes after accidental exposure). Under the current structure, the Director of the Folding Room has to (1) recognize the potential risk of eye injuries, (2) know that emergency eye wash stations should be installed, and (3) request the Architect to install—and keep in good working order—eye wash stations where they are needed. If the Director of the Folding Room does not request the Architect to install new or repair inoperable stations, the Architect likely will not know of the need for the facility. Once the Architect is aware of the need, he told us he has the responsibility to correct the hazard.

GPO Has a Comprehensive Safety and Health Program but Congressional Offices Do Not

As required by the act, GPO has a comprehensive safety and health program that provides protections comparable to those required by OSHA standards and regulations. The Occupational Health and Environmental Services and its Safety Branch, which has a staff of about 12, administer the program. Significant features include a clearly stated policy on workplace safety and health, employee involvement through joint labor-management safety and health committees, comprehensive safety and industrial hygiene surveys and inspections on a regular basis, a computerized tracking system to follow through on corrective actions required as a result of inspections, formalized accident investigations, a plan for hazard abatement and control, and hazard awareness training for employees and supervisors.

Although none of the congressional offices we reviewed has a comprehensive program with all the features present at GPO or recommended by OSHA,⁶ each of them has some elements of a program. For example, the Office of the Architect has a Safety Engineering Division, with a staff of five; staff in the Office of the Attending Physician follow Department of Health and Human Services guidelines to protect against bloodborne diseases; a designated manager in the Folding Room conducts regular safety inspections; and shop supervisors in the Department of Office Furnishings conduct limited safety inspections. Each office's approach lacks one or more of the four elements that are required of federal agencies and recommended for the private sector: (1) self-inspection for both safety and health hazards, (2) a written plan for hazard abatement and control, (3) safety and health training for employees and managers, and (4) employee involvement.

Comments From GPO and Congressional Offices Reviewed

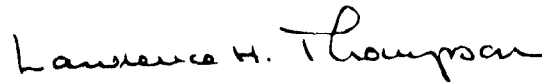
We obtained comments from officials at GPO and each of the congressional offices in our study in two ways: (1) we met with them to discuss our observations about their safety and health programs and the results of the GAO consultants' safety and health audits and (2) we invited them to comment on drafts of the consultants' audit reports. With the exception of the Architect of the Capitol, GPO and each of the other offices received only the draft audit report related to their workplaces. Because of its responsibility for the repair and maintenance of the buildings in which the other offices are located, the Architect's Office also received copies of audit reports for the Offices of the Clerk and the Doorkeeper.

In our meeting and in their written comments on the consultants' audit reports, these officials generally acknowledged the existence of the

⁶As previously noted, these offices are not required to have comprehensive safety and health programs.

problems noted and expressed their intention to correct them. The safety and health consultants reviewed the oral and written comments provided, as well as some additional documentation provided along with the comments, and made changes as they thought appropriate to the draft audit reports. Written comments are included in this report as appendixes IX through XIII.

As arranged with your staff, unless you publicly announce its contents earlier, we plan no further distribution of this report until 7 days from its issue date. At that time, we will send copies of this report to the Architect of the Capitol, the Attending Physician, the Doorkeeper of the House of Representatives, the Clerk of the House of Representatives, the Public Printer, the Secretary of Labor, and other interested parties. This report was prepared under the direction of Linda G. Morra, who may be reached on (202) 512-7014 if you or your staff have any questions about this report. Other major contributors are listed in appendix XIV.



Lawrence H. Thompson
Assistant Comptroller General

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Abbreviations

CFR	Code of Federal Regulations
GAO	General Accounting Office
GPO	Government Printing Office
LTCR	lost time case rate
OSHA	Occupational Safety and Health Administration
SAIC	Science Applications International Corporation

Objectives, Scope, and Methodology

In a May 13, 1992, letter, the Ranking Minority Member and 13 other Minority Members of the House Committee on Education and Labor asked us to review the occupational safety and health protections afforded congressional employees. In that letter and subsequent discussions with their staff, we were asked whether the protections afforded congressional employees are the same as the protections provided to private sector workers and other federal employees under the Occupational Safety and Health Act of 1970. Specifically, we were asked to (1) determine whether there are safety and health programs and structures in place to protect congressional employees and (2) review the working conditions in some of these workplaces.

As agreed with the requesters' staff, we made two decisions about the scope of the study:

- we selected the agencies and offices for which we would gather information about their overall structure, or approach, for safety and health and
- we identified the work locations within those agencies and offices where we would conduct safety and health audits.

In making these decisions, we considered the likely risk of injuries and illnesses in the agencies, offices, and work locations.

The legislative branch of the U.S. government consists of the Congress and independent agencies and offices. Congressional employees work in Members' and Committees' offices, administrative offices in the House and Senate, and in offices that support both the House and the Senate. Offices of the House include the leadership offices, the Clerk, the Doorkeeper, the Postmaster, and the Sergeant at Arms. Offices that serve the House and the Senate include the Architect of the Capitol and the Attending Physician. The legislative branch agencies include the Congressional Budget Office, the Copyright Royalty Tribunal, the General Accounting Office, the Government Printing Office, the Library of Congress, and the Office of Technology Assessment.

We selected for review one legislative agency (GPO) and four congressional offices. The congressional offices were (1) the Office of the Architect of the Capitol, (2) the Office of the Attending Physician, (3) the Office of the Clerk of the House of Representatives, and (4) the Office of the Doorkeeper of the House of Representatives. We selected two of these (GPO and Architect of the Capitol) because their rates of workplace injury

and illness were among the highest in the legislative branch.¹ We selected the Office of the Attending Physician because of the requesters' specific concern about the hazards of bloodborne diseases, such as HIV and hepatitis B. We selected the Office of the Clerk and the Office of the Doorkeeper because, within the offices of the House of Representatives itself, we judged these were the offices where employees would most likely be working with hazardous equipment or carrying out hazardous processes.

We then judgmentally selected 25 worksites in the congressional offices and GPO where we would review working conditions. They are:

- 10 shops, 2 supply rooms, and 2 construction sites of the Architect of the Capitol;
- 4 first aid rooms of the Office of the Attending Physician;
- the Publications Distribution Service (the Folding Room) of the House Doorkeeper;
- 3 shops of the House Clerk's Department of Office Furnishings; and
- GPO's Quality Control and Technical Department, Press Division, and Binding Division.

To determine the safety and health programs and structures in place to protect congressional workers, we interviewed officials of the four congressional offices and GPO. We asked them about their efforts to provide workplaces that are free from the risk of occupational injury and illness. We obtained and reviewed available documents about their activities.

To review working conditions, we employed, under contract with Science Applications International Corporation, safety and health professionals to conduct safety and health audits (limited-scope inspections) at the workplaces we selected. These audits assessed whether (1) safety and health programs in place are consistent with regulations set by OSHA and (2) workplace practices adequately protect workers. They consisted of discussions with appropriate supervisors, walk-through inspections of the facilities,² brief interviews with selected employees, and reviews of

¹In fiscal year 1989, their lost time case rates (LTCR) were 6.02 and 6.76, respectively. In comparison, the LTCR for the entire federal government was 2.71, and the LTCR for the legislative branch was 2.25. The LTCR is the number of cases, per 100 workers, in which an employee lost time away from work as the result of a work-related injury or illness.

²The walk-through inspections were not intended to be comprehensive OSHA-style safety and health compliance surveys, but were designed to (1) give the audit team an overview of potential safety and health hazards and (2) determine if major occupational safety and health inadequacies are consistently found throughout the facility that indicate a deficiency of major safety and health program elements.

available safety and health documents. SAIC conducted the safety and health audits from August 3 to 14, 1992.

Mr. Robert Reisdorf was the project leader for the SAIC audit team. Mr. Reisdorf is a certified industrial hygienist with more than 17 years of experience in the field of occupational safety and health. He has extensive experience conducting safety and health inspections and audits for the private sector and the federal government. Mr. Leslie White and Mr. Jeffery Chapman, safety specialists, participated in the audits. Mr. White, the president of Events Analysis, Inc., has about 25 years experience in safety management. Mr. Chapman, a certified safety professional, is director of Events Analysis's Occupational Health and Safety Group. He has more than 13 years experience in the safety field. Mr. White and Mr. Chapman have extensive and diversified experience in conducting safety and health inspections and audits.

Summary of Hazards Observed During Audits of Congressional Offices and GPO

Table II.1: Serious Hazards

Serious hazard involving	OSHA Standard (29CFR)	AOC ^a	OAP ^b	DOF ^c	FR ^d	GPO
Fixed fire protection equipment						
Improperly located sprinklers	1910.159(a)(2)&(c)			X		
Control of hazardous energy						
No program for locking out/tagging out electricity to machines during service	1910.147(c)(1)	X			X	
Safe handling of hazardous chemicals						
No written hazard communication program	1910.1200(e)	X		X		
No hazard awareness training	1910.1200(h)	X		X		
No list of chemicals used in workplace	1910.1200(e)	X		X		
Material safety data sheets not available	1910.1200(g)	X		X		
Unlabeled/improperly labeled containers	1910.1200(f)	X		X		
Exposure to excessive noise						
Hearing conservation program not fully enforced	1910.95(c)	X			X	X
Laboratory areas						
Eating/drinking where toxic chemicals used	1910.141(g)(2)					X
Machine safety guards						
No guard on grinding machines	1910.215(b)(9)	X				
No guard at point of operation	1910.212(a)(3)(ii)					X
Improper guards for rotating shafts	1910.219(c)(4)				X	
Improper guards for fan blades	1910.212(a)(5)	X			X	
No blade guard on table saws	1910.213(c)(1)	X				
No automatic return on radial saws	1910.213(h)(4)	X				
Exits						
Inadequate number of exit signs	1910.37(q)(1)				X	
Inadequate number of exits	1910.37(d)(1)	X				
No emergency action plan	1910.38(a)(1)	X				
First aid						
No emergency eye wash station	1910.151(c)	X			X	
Electrical wiring						
Improper installation of extension cord	1910.303(b)				X	
Unsafe coil hot plates	1903.1				X	
Hazardous materials						
Inadequate ventilation of storeroom	1910.106(d)(4)			X		
Excess flammable liquids in work area	1910.106(e)(2) ^e		X			

(continued)

**Appendix II
Summary of Hazards Observed During
Audits of Congressional Offices and GPO**

Serious hazard involving	OSHA Standard (29CFR)	AOC^a	OAP^b	DOF^c	FR^d	GPO
Respiratory protection						
No written respiratory protection program	1910.134(b)	X		X		
Work in confined or enclosed spaces						
No training on entering confined space	1926.21(b)(6)(i)	X				

^aArchitect of the Capitol.

^bOffice of the Attending Physician.

^cDepartment of Office Furnishings, Office of the Clerk.

^dFolding Room, Office of the Doorkeeper.

^eDiffers from the citation in the final audit report. (See p. 63, item 3-5.)

Table II.2: Other-Than-Serious Hazards

Other-than-serious hazard involving	OSHA Standard (29CFR)	AOC^a	OAP^b	DOF^c	FR^d	GPO
Use of compressed air						
Unsafe use of air guns	1910.242(b)	X				
Portable fire protection equipment						
Improperly located fire extinguishers	1910.157(c)(1)	X			X	
No documentation of annual maintenance	1910.157(e)(3)	X			X	
No current inspection	1910.157(e)(1)			X		
Fixed fire protection equipment						
Improperly located sprinklers	1910.159(a)(2)&(c)				X	X
Bloodborne diseases						
No exposure control plan	1910.1030		X			
Electrical wiring						
Exposed electrical contacts	1910.303(g)(2)(i)					X
Blocked access to electrical panel box	1910.303(g)(1)	X			X	
Missing covers on outlets	1910.305(b)(2)	X			X	
Missing covers on panel boxes	1910.305(d)				X	
Unsafe equipment in hazardous areas	1910.307(b)			X		
Safe handling of hazardous chemicals						
No written hazard communication program	1910.1200(e)		X		X	
No hazard awareness training	1910.1200(h)		X		X	
No list of chemicals used in workplace	1910.1200(e)		X		X	X
Material safety data sheets not available	1910.1200(g)		X		X	X

(continued)

**Appendix II
Summary of Hazards Observed During
Audits of Congressional Offices and GPO**

Other-than-serious hazard involving	OSHA Standard (29CFR)	AOC^a	OAP^b	DOF^c	FR^d	GPO
Unlabeled/improperly labeled containers	1910.1200(f)				X	X
Exits						
No exit sign	1910.37(q)(1)				X	
Unlighted exit sign	1910.37(q)(6)				X	
Blocked access to exit	1910.37(f)(1)				X	
Personal protective equipment						
Safety toe footwear not provided/used	1910.132(a)	X				
Improper respirator used	1910.134(c)	X				
Unsanitary respirator used	1910.134(f)	X				
Walking-working surfaces						
Floor loading limit not posted	1910.22(d)(1)	X				
Tripping hazard	1910.22(a)(1)					X
No guard rail on raised floor	1910.23(c)(1)	X				
First aid						
Inadequate first aid kit	1910.151(b)	X				
No emergency eye wash station	1910.151(c)				X	
Laboratory areas						
No chemical hygiene plan	1910.1450					X
Machine safety guards						
No guard on grinding machine	1910.215(b)(9)				X	
No/inadequate work rests	1910.215(a)(4)	X		X	X	
Fixed machinery not anchored	1910.212(b)	X		X	X	
Improper machine motor guards	1910.212(a)(1)					X
No guard at point of operation	1910.212(a)(3)(ii)					X
Unguarded rotating shaft ends	1910.219(c)(4)				X	
No automatic return on radial saws	1910.213(h)(4)			X		
Unguarded drive belts and pulleys	1910.219(d)(3)	X				
Asbestos removal						
No documentation at site on training	1926.58(k)	X				
Control of hazardous energy						
Unlabeled electrical controls locked in ON position	1910.147(c)(1)				X	

^aArchitect of the Capitol.

^bOffice of the Attending Physician.

^cDepartment of Office Furnishings, Office of the Clerk.

^dFolding Room, Office of the Doorkeeper.

OSHA Standards Covering Hazards Observed During Audits of Congressional Offices and GPO^a

29 CFR	Description
1903.1	It is employers' general duty to provide employees a workplace and employment free of recognized hazards likely to cause serious physical harm or death. The standard covers hazardous conditions or practices not covered by an OSHA standard.
1910.22(a)(1)	Places of employment, passageways, storerooms, and service rooms must be kept clean and orderly.
1910.22(d)(1)	Approved floor loads must be displayed in a conspicuous place in each space used for storage.
1910.23(c)(1)	Open-sided floors or platforms 4 feet or more above an adjacent floor or ground level must be guarded on all open sides, unless there is an entrance to a ramp, stairway, or fixed ladder.
1910.37(d)(1)	The capacity of each exit for any floor or other occupied space shall be sufficient for the number of occupants in the space.
1910.37(f)(1)	Exits shall be located and access arranged so that exits are readily accessible at all times.
1910.37(q)(1)	Exits must be marked by a visible sign.
1910.37(q)(6)	Exit signs shall be illuminated by a reliable light source.
1910.38(a)(1)	Emergency action plans must be written to ensure employee safety in case of fire and other emergencies.
1910.95(c)	Employers must implement an effective hearing conservation program when sound levels exceed an 8-hour time-weighted average of 85 decibels. When engineering or administrative controls do not reduce the noise level to acceptable levels, personal protective equipment shall be provided and used.
1910.106(d)(4)	Inside storage rooms for flammable or combustible liquids must have a ventilation system.
1910.106(e)(2) ^b	The quantity of flammable or combustible liquids kept near spraying operations should be the minimum required for operations and not exceed a supply for 1 day or one shift.
1910.132(a)	Personal protective equipment, including protective clothing, must be provided and used whenever necessary because of hazards that might cause injury or impairment in the function of any part of the body through physical contact.
1910.134(b)	Employers must establish a written respiratory protection program governing the selection and use of respirators.

(continued)

**Appendix III
OSHA Standards Covering Hazards
Observed During Audits of Congressional
Offices and GPO***

29 CFR	Description
1910.134(c)	Respirators shall be selected to protect the health of workers on the basis of the hazard to which workers are exposed.
1910.134(f)	A program for the maintenance and care of respirators shall be based on the type of plant, working conditions, and hazards, and must include inspecting, cleaning, and disinfecting all respirators.
1910.141(g)(2)	Employees cannot eat or drink in or near areas exposed to toxic material.
1910.147(c)(1)	Employers must establish a program for locking out or tagging out of service machines or equipment that are being serviced to ensure that all sources of energy are stopped. Employees must be trained in the procedures and periodic inspections must be conducted annually to ensure the program is effective.
1910.151(b)	First aid supplies should be readily available and kept current.
1910.151(c)	Employers must provide adequate facilities for drenching or flushing the eyes and body in work areas where workers may be exposed to injurious materials.
1910.157(c)(1)	Employers must provide portable fire extinguishers and locate them so they are easily accessible.
1910.157(e)(1)	Employers must establish a program for inspecting all fire extinguishers in the workplace.
1910.157(e)(3)	Annual maintenance checks of fire extinguishers must be documented.
1910.159(a)(2)&(c)	Automatic sprinklers must be located to provide the necessary discharge patterns and water flow for complete coverage.
1910.212(a)(1)	Machines must have safety guards to protect operators and others in the work area from motor-driven pulleys and belts.
1910.212(a)(3)(ii)	Safety guards must be installed on machines at the point where work is performed.
1910.212(a)(5)	Fan blades must have safety guards.
1910.212(b)	Machines designed for a fixed location should be securely anchored to prevent movement or "walking."
1910.213(c)(1)	Hand-fed table saws must be guarded by a hood that automatically adjusts itself to the thickness of and remains in contact with the material being cut to protect the operator from splinters and broken saw teeth.
1910.213(h)(4)	Radial saws must be installed so that the cutting head gently returns to the starting position when released by the operator.

(continued)

**Appendix III
 OSHA Standards Covering Hazards
 Observed During Audits of Congressional
 Offices and GPO***

29 CFR	Description
1910.215(a)(4)	An adjustable work rest must be used to support work on grinding machines and shall be adjusted to keep the work close to the grinding wheel.
1910.215(b)(9)	Adjustable safety guards must be used on grinding machines to protect the operator.
1910.219(c)(4)	Projecting shaft ends on power transmission belts must have a smooth edge and end and not project more than 1/2 the diameter of the shaft, unless guarded by nonrotating caps or safety sleeves.
1910.219(d)(3)	Pulleys on power transmission belts must have safety guards, and broken pulleys must not be used.
1910.242(b)	Compressed air must not be used for cleaning purposes except where pressure is reduced to less than 30 p.s.i.
1910.303(b)	Electrical equipment must be free from recognized hazards.
1910.303(g)(1)	Electrical equipment must have sufficient access and working space to ensure safe operation and maintenance.
1910.303(g)(2)(i)	Live parts of electrical equipment shall be guarded against accidental contact.
1910.305(b)(2)	Electrical wall outlets and junction boxes must have approved covers.
1910.305(d)	Electrical panel boxes must have approved covers.
1910.307(b)	Electrical equipment used in hazardous locations must be safe for the location.
1910.1030	Employer must have a written exposure control plan governing transmission of bloodborne pathogens.
1910.1200(e)	Employers who use hazardous chemical in the workplace must develop and implement a written hazard communication program on the safe use of the hazardous chemicals. A list of the hazardous chemicals used must be compiled.
1910.1200(f)	Employers who use hazardous chemicals must properly label chemical containers and show hazard warnings.
1910.1200(g)	Employers who use hazardous chemicals must have available a material safety data sheet on each hazardous chemical used.
1910.1200(h)	Employers who use hazardous chemicals must provide hazard awareness training to workers who use the chemicals.
1910.1450	Employers must develop and implement a written chemical hygiene program for the safe use of chemicals in laboratory areas.

(continued)

**Appendix III
OSHA Standards Covering Hazards
Observed During Audits of Congressional
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29 CFR	Description
1926.21(b)(6)(i)	All employees required to enter into confined or enclosed spaces must be instructed on all hazards, necessary precautions, and the use of protective and emergency equipment. Employers must comply with any specific regulations that apply to work in dangerous areas.
1926.58(k)	Documents on worker training for asbestos removal projects must be kept at the worksite.

^aOSHA's safety and health standards are contained in title 29 of the Code of Federal Regulations (CFR). The description of the standards is taken largely from OSHA's "General Industry Digest" (OSHA Publication 2201) and "Construction Industry Digest" (OSHA Publication 2202).

^bDiffers from the citation in the final audit report. (See p. 63, item 3-5.)

Report on Occupational Safety and Health Audit of the Facilities of Office of the Architect of the Capitol

GAO Contract No. PC9200041BF
SAIC Project No. 06-0759-04-0315-002

FINAL REPORT

Occupational Safety and Health Audit
of the Facilities of
Office of the Architect of the Capitol
U.S. Congress

September 29, 1992

Submitted to:

General Accounting Office
Human Resources Division

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I. INTRODUCTION

On August 3 and 4, 1992, workplace safety and health audits were performed at 14 facilities of the Office of the Architect of the Capitol in Washington, D.C. The audits covered carpentry, sheet metal, machine, and custodial shops. A list of the facilities is presented in Section II. These audits were performed for the General Accounting Office (GAO) under a contract between Science Applications International Corporation (SAIC) and GAO. The audit was performed by Robert Reisdorf, CIH, of SAIC, and Jeffrey Chapman, CSP, of Events Analysis, Inc.

The primary objectives of the audit were to determine whether:

- The safety and health programs and practices in use adequately protect workers
- The safety and health programs and practices meet Occupational Safety and Health Administration (OSHA) requirements.

The audit consisted of discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and reviews of available safety and health documents.

The walk-through inspection was not intended to be a comprehensive OSHA-style safety and health compliance survey, but was designed 1) to give the survey team an overview of potential safety and health hazards; and 2) to determine if major occupational safety and health inadequacies were present throughout the facility, which would indicate a deficiency of major safety program elements.

Evaluation Criteria

OSHA regulations are not currently applicable to the Architect of the Capitol (AOC). However, in order to determine whether or not the occupational safety and health programs and practices observed in the AOC facilities afford the same protection as those in the private sector, the audit team was asked to compare observed programs and practices with those required by OSHA regulations. Consequently, the results of the audit, presented in this report, contain a reference to the relevant OSHA standard for comparison purposes only and do not indicate that OSHA regulations were violated. In addition, a Risk Classification notation of "Serious", or "Other-than-serious" is presented for each of the audit findings. These notations provide the Audit Team's assessment of how an OSHA Compliance Safety and Health Officer (CSHO) might view the conditions if OSHA had regulatory authority over this workplace. The Risk

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Classification of Serious corresponds to the OSHA definition of a Serious Violation which requires that there is a substantial probability that serious physical harm or death could result from an existing condition.

Note that in practice the determination of whether or not a particular condition is termed Serious or Other-than-serious can vary depending upon the judgement of the individual CSHO. Furthermore, additional Serious conditions could be identified at a workplace if comprehensive surveys rather than walk-through surveys were performed. A comprehensive survey, which could take several days to complete, might provide new or more detailed information with which to make a determination.

Section II of this report presents a description of the facility that was audited. Section III contains a description of any serious deficiencies that were observed during the audit. Section IV contains a detailed description of the deficiencies noted and includes a reference to OSHA.

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II. FACILITY DESCRIPTION

The Architect of the Capitol, which employs approximately 2,300 workers, is responsible for the structural and mechanical care of the U.S. Capitol Building. Additional responsibilities include the domestic care and maintenance of House Office Buildings, including the maintenance and operation of mechanical and electrical equipment. The following is a description of the 14 AOC facilities audited.

- 1) Sheet Metal Shop - Capitol
Location: Capitol Building
Number of Employees: 10
Description: The sheet metal shop occupies approximately 1,500 square feet in the basement of the Capitol Building. The shop contains drill presses, bench grinders, and bandsaws, as well as a welding area. The welding area was equipped with a local exhaust ventilation system. Approximately ten personnel are assigned to this shop. However, it should be noted that a large portion of their work is performed away from the shop, e.g., during the installation of the equipment they manufacture. Work practices followed by these personnel while away from the shop were not reviewed during this audit.

- 2) Carpentry Shop - Capitol
Location: Rayburn Building
Number of Employees: 6
Description: The Capitol carpentry shop contains saws, planers, jointers, etc., all of which were properly guarded. This shop could serve as an example of how a carpentry shop should be equipped and maintained.

- 3) Machine Shop - Capitol
Location: Capitol
Number of Employees: 8
Description: The shop is small (approximately 200 square feet) and contained a metal lathe, bench grinder, and drill press.

- 4) Carpentry Shop - LOC
Location: Jefferson Building
Number of Employees: 7
Description: The Library of Congress carpentry shop is equipped with a variety of equipment, including table saws, radial arm saws, planers, and jointers.

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- 5) Sheet Metal Shop - LOC
Location: Jefferson Building
Number of Employees: 11
Description: Employees of this shop perform various types of metal work including the fabrication of ductwork for Library of Congress buildings.
- 6) Machine Shop - LOC
Location: Jefferson Building
Number of Employees: 12
Description: The shop provides maintenance of the conveyer belt system for the Library of Congress.
- 7) Carpentry Shop - House
Location: West underground garage
Number of Employees: 20
Description: The House Building carpentry shop fabricates items ranging from doors to office furniture and can perform complete office renovations. As with other shops, much work is performed outside of the shop.
- 8) Sheet Metal Shop - House
Location: Rayburn Building
Number of Employees: 13
Description: This shop contains grinders, drill presses, etc. and performs welding (occasional), metal work, and soldering. Installation and repair work activities are conducted at remote locations.
- 9) Supply Room - House
Location: Rayburn Building
Number of Employees: 6
Description: This area is used for storage of custodial and maintenance supplies.
- 10) Supply Room - Capitol
Location: Capitol Building
Number of Employees: 4
Description: This area is used for storage of custodial and shop supplies.

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- 11) Construction Site - Construction Management
Location: Cannon Building
Number of Employees: 18
Description: The AOC is currently renovating the Cannon Building to install sprinklers and new wiring. This project has necessitated the erection of a scaffolding system to allow the workers access to the high ceiling areas for the installation of the aforementioned utilities. The project is being performed in stages, one corridor at a time. The scaffolding is arranged to allow access to and from the congressional offices located beneath the surface of the scaffold.

- 12) Carpentry Shop - Construction Management
Location: DC Village
Number of Employees: 5
Description: This shop provides woodworking services for AOC projects.

- 13) Sheet Metal Shop - Construction Management
Location: DC Village
Number of Employees: 7
Description: This shop performs metal work, including ductwork, welding, soldering, cutting, etc.

- 14) Construction Site - Construction Management
Location: Jefferson Building
Number of Employees: 15
Description: An asbestos removal project is being performed inside a specially constructed, ventilated, containment system.

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III. SUMMARY

Overview

The AOC is deficient in some of the major health and safety program elements that are appropriate for their workplaces. In addition, a number of deficiencies were observed which would constitute serious unsafe work practices or serious violations of OSHA regulations. Other deficiencies were noted which would be considered Other-than-serious.

Serious Deficiencies

The audit identified the following serious conditions related to occupational safety and health at the Architect of the Capitol facilities.

1. A Hazard Communication Program is not being implemented at AOC. A written Hazard Communication Program has not been developed for AOC employees and basic hazard awareness training has not been provided, there were other deficiencies regarding the implementation of the Program throughout the audited areas. The other deficiencies include:
 - Failure to provide and make available material safety data sheets (MSDS's) for the specific materials found in use at various work locations, and
 - The use of unlabeled or improperly labeled containers of chemicals at numerous workstations.
2. An effective hearing conservation program is not being implemented in the high noise areas of the AOC shops (See Observation 2).
3. There is no written lock-out/tag-out program in effect for AOC employees. A lock-out/tag-out program would require equipment to be shut off as close as possible to the piece of equipment and either locked or tagged to prevent the unit from being inadvertently turned on. Such a program reduces the risk of employees being caught in the machinery or electrocuted during maintenance or repair.
4. There is no written occupant emergency plan for any of the House Buildings.

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5. There is no confined-space-entry training for workers who must enter confined spaces. Entering confined spaces without proper procedures can result in injury or death.
6. There is no written respiratory protection program for employees who use respirators.
7. Machines throughout work areas were not equipped with engineering controls and other safety features. (See Observations 1-2, 3-2, 4-2, 5-2, 6-2, 7-2, 8-2, 12-2, and 13-2.)
8. Emergency eyewash stations are not provided in areas where chemical splashes or other eye injury may occur. (See Observations 1-3, 4-3, 5-3, 6-3, 7-3, 8-3, 9-2, 12-3, 13-3.)
9. A construction site scaffold is not equipped with an emergency egress stairway. (See Observation 11-1.)

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IV. OBSERVATIONS AND FINDINGS

General Observations

- 1) There is no program to address the safe use of chemicals at many of the facilities that were audited. The absence of such a program could result in fires, employee contact with toxic materials, or overexposure to toxic materials.
 - A list (Inventory) of hazardous chemicals in the AOC workplaces has not been developed
 - Material safety data sheets (MSDS) for hazardous chemicals were not available
 - Hazard awareness training has not been provided
 - A written hazard communication program has not been developed
 - Numerous unlabeled containers of hazardous chemicals were observed.
Reference: OSHA 1910.1200
Risk Classification: Serious.

- 2) Regarding hearing conservation the following deficiencies were noted:
 - Baseline surveys to determine noise exposure have not been performed at some locations
 - Employees are apparently being exposed to noise levels above 90 decibels, A-weighted (dBA) in the following areas:
 - Carpentry Shop, Capitol building
 - Carpentry Shop, D.C. Village
 - Sheet Metal Shop, D.C. Village
 - Carpentry Shop - House, West underground garage.
 - Hearing protection is generally available in most areas, however, the use of hearing protection is not enforced.

Exposure to noise above 90 dBA can result in permanent hearing loss.
Reference: OSHA 1910.95
Serious: Serious.

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- 3) There is no written lock out/tag out program in effect for AOC personnel who perform work on and/or in and around energized equipment. A lock-out/tag-out program would require equipment to be shut off as close as possible to the piece of equipment and either locked or tagged to prevent the unit from being inadvertently turned on. Such a program reduces the risk of injury due to electrical shock or mechanical energy during maintenance or repair.

Reference: 29 CFR 1910.147(c)(1)

Risk Classification: Serious.

- 4) There is no written occupant emergency plan for any of the House Buildings. The absence of an emergency plan outlining the procedures that building occupants are to follow in the event of a fire, bomb threat, chemical spill or other such emergency presents a life safety hazard.

Reference: 29 CFR 1910.38(a)(1)

Risk Classification: Serious.

- 5) There is no confined space entry training being provided. AOC employees involved in construction are required to enter confined spaces on an occasional basis. Entering confined spaces without proper procedures can result in serious injury or death.

Reference: 29 CFR 1926.21(b)(6)(i)

Risk Classification: Serious.

Specific Observations

1) Sheet Metal Shop - Capitol Building

- 1-1) Regarding personal protective equipment, the following deficiencies were noted:

- Personnel in the shop are not provided with or required to use safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

- A half face respirator was found hanging on a hook of the welding area. This respirator, in addition to being unsanitary from improper storage and lack of cleaning, was equipped with cartridges approved for use with pesticides, not welding. Improper use of respirators can result in overexposure to toxic materials.

Reference: 29 CFR 1910.134(c) & (f)

Risk Classification: Other-than-serious.

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- There was no written respiratory protection program available for review at the time of the audit. The absence of an effective program can result in overexposure to toxic materials.

Reference: 29 CFR 1910.134(b)

Risk Classification: Serious.

1-2) Several pieces of equipment in the shop were not properly guarded.

- The Delta drill press, mounted on the wall near the entrance to the shop, does not have a guard over its drive belt and pulleys. Personnel using the equipment, with long hair, loose clothing or jewelry may become entangled in the equipment.

Reference: 29 CFR 1910.219(d)(3).

Risk Classification: Other-than-serious.

- Both the Craftsman and Cadet bench grinders are in need of tongue guards. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

- The compressed air gun used for cleaning equipment operates at greater than 30 psi and does not have appropriate guarding.

Reference: 29 CFR 1910.242(b)

Risk Classification: Other-than-serious.

1-3) With regard to emergency first aid equipment, the following deficiencies were noted:

- The shop uses minor amounts of materials that may be injurious to the eyes if contacted, and is not equipped with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous, 15-minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

- The first aid kit in the shop was not complete, and the materials that were present appeared to be out of date. The first aid kit should be re-stocked.

Reference: 29 CFR 1910.151(b)

Risk Classification: Other-than-serious.

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1-4) With regard to electrical safety, the following deficiencies were identified:

- The electrical wall outlet adjacent to the entrance to the welding area was missing the face plate, thereby exposing live electrical parts.

Reference: 29 CFR 1910.305(b)(2)

Risk Classification: Other-than-serious.

- Access to the electrical panel box was blocked by storage of equipment. In the event of an emergency, access to the panel would be delayed. The equipment in front of the panel should be relocated, and the area (to within 36 inches of the panel) should be kept clear at all times.

Reference: 29 CFR 1910.303 (g)(1)

Risk Classification: Other-than-serious.

1-5) Two deficiencies pertaining to portable fire extinguishers were noted in this shop.

- The portable fire extinguishers were not mounted on the wall so as to be readily visible in the event they are needed in an emergency.

Reference: 29 CFR 1910.157(c)(1)

Risk Classification: Other-than-serious.

- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

2) Carpentry Shop - Rayburn Building

Note: All equipment in this area was observed to be properly maintained and guarded. No Serious hazards were observed.

2-1) Regarding personal protective equipment, the following deficiency was noted:

- Personnel in the shop are not provided with or required to use safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

2-2) The storage loft did not have the floor load limit posted. At present, only minor amounts of office furnishings are stored in the loft. Additional storage beyond its capacity could result in collapse of the loft. A structural engineer should determine and post the floor load limit for this loft.

Reference: 29 CFR 1910.22(d)(1)

Risk Classification: Other-than-serious.

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- 2-3) There is no documentation that the portable fire extinguishers located in the shop have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

3) Machine Shop, Rayburn Building

- 3-1) Regarding personal protective equipment, the following deficiency was noted:

- Personnel in the shop are not provided with, or required to use safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

- 3-2) Several pieces of equipment in the shop were not properly guarded.

- The Delta and Rockwell drill presses did not have guards over their belt drives and pulleys. Personnel using the equipment, with long hair, loose clothing or jewelry may become entangled in the equipment.

Reference: 29 CFR 1910.219(d)(3)

Risk Classification: Other-than-serious.

- The Black & Decker bench grinder located in the shop is in need of tongue guards. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

- The work rests of the Black & Decker grinder located in the shop are out of adjustment. The work rests should be continually adjusted, such that the maximum opening between the rests and the wheel is not greater than 1/8 of an inch. This is to prevent an object from being inadvertently jammed between the rest and the wheel, causing wheel breakage.

Reference: 29 CFR 1910.215(a)(4)

Risk Classification: Other-than-serious.

- The Black & Decker grinder is not bolted to the floor to prevent inadvertent tipping during use.

Reference: 29 CFR 1910.212(b)

Risk Classification: Other-than-serious.

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- 3-3) One finding pertaining to portable fire extinguishers was noted in this shop.
- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.
- 4) **Carpentry Shop - LOC, Jefferson Building**
- 4-1) Regarding personal protective equipment, the following deficiency was noted:
- Personnel in the shop are not provided with, or required to use safety toe footwear.
Reference: 29 CFR 1910.132(a)
Risk Classification: Other-than-serious.
- 4-2) Several pieces of equipment in the shop were not properly guarded.
- The Delta table saw is not equipped with an upper blade guard to prevent inadvertent contact with the blade. A guard should be arranged such that it automatically adjusts itself to the thickness of, and remains in contact with, the material being cut.
Reference: 29 CFR 1910.213(c)(1)
Risk Classification: Serious.
 - The Delta radial arm saw is not provided with an automatic return. The saw should be arranged such that the front of the unit is slightly higher than the rear, so as to cause the cutting head to return gently to the starting position when released by the operator.
Reference: 29 CFR 1910.213(h)(4)
Risk Classification: Serious.
 - The table fan has an old style, improper blade guard. The existing guard should be modified such that the openings in the guard are no greater than 1/2 inch.
Reference: 29 CFR 1910.212(a)(5)
Risk Classification: Serious.
 - The compressed air gun used for cleaning equipment operates at greater than 30 psi and does not have appropriate guarding.
Reference: 29 CFR 1910.242(b)
Risk Classification: Other-than-serious.
 - The Royal drill press and the Craftsman bandsaw are not anchored to the floor to prevent tripping during use.
Reference: 29 CFR 1910.212(b)
Risk Classification: Other-than-serious.

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4-3) Regarding emergency first aid equipment, the following deficiencies were noted:

- The shop uses minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

4-4) One finding pertaining to portable fire extinguishers was noted in this shop.

- There is no documentation that portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

5) Sheet Metal Shop - LOC, Jefferson Building

5-1) Regarding personal protective equipment, the following deficiencies were noted:

- Personnel in the shop are not provided with, or required to use safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

5-2) Several pieces of equipment in the shop were not properly guarded.

- The pedestal grinder, located in the welding area of the shop, is missing the tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

- The Wissota bench grinder is missing the tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

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- The pedestal grinder located in the welding area is not anchored to the floor to prevent tipping during use.

Reference: 29 CFR 1910.212(b)

Risk Classification: Other-than-serious.

5-3) With regard to emergency first aid equipment, the following deficiency was noted:

- The shop uses minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

5-4) One finding pertaining to portable fire extinguishers was noted in this shop.

- There is no documentation that portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

6) Machine Shop - LOC, Jefferson Building

6-1) Regarding personal protective equipment, the following deficiency was noted:

- Personnel in the shop are not provided with or required to use safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

6-2) Several pieces of equipment in the shop were not properly guarded.

- The Black & Decker bench grinder is missing the tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operator as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

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- The US Electrical Tool Company bench grinder is not equipped with tongue guards. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

- The Delta drill press is not anchored to the floor to prevent tipping during use.

Reference: 29 CFR 1910.212(b)

Risk Classification: Other-than-serious.

- The Delta drill press, located in the main machine shop across the hall from room C183, is not anchored to the floor to prevent tipping during use.

Reference: 29 CFR 1910.212(b)

Risk Classification: Other-than-serious.

6-3) With regard to emergency first aid equipment, the following deficiency was noted:

- The shops use minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15-minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

6-4) Two findings were identified concerning the walking/working surfaces of this shop.

- The storage loft located above the compressed gas cylinder storage rooms, is not provided with a standard guardrail system to prevent personnel from inadvertently falling from the loft. A standard guardrail system, complete with midrails and toeboards should be installed on this loft.

Reference: 29 CFR 1910.23(c)(1)

Risk Classification: Other-than-serious.

- The storage loft located above the compressed gas cylinder storage rooms does not have its floor load limit posted. Excessive storage of materials could result in collapse of the loft. A structural engineer should determine and post the floor load limit for this loft.

Reference: 29 CFR 1910.22(d)(1)

Risk Classification: Other-than-serious.

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- 6-5) One finding pertaining to portable fire extinguishers was noted in this shop.
- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.
- 7) **Carpentry Shop - House, West underground storage**
- 7-1) Regarding personal protective equipment, the following deficiency was noted:
- Personnel in the shop are not provided with, or required to use, safety toe footwear.
Reference: 29 CFR 1910.132(a)
Risk Classification: Other-than-serious.
- 7-2) Several pieces of equipment in the shop were not properly guarded.
- The Rockwell 12-inch tilting arbor saw does not have a blade guard to prevent inadvertent contact with the blade. A guard should be installed and arranged so that it will automatically adjust itself to the thickness of, and remain in contact with, the material being cut.
Reference: 29 CFR 1910.213(c)(1)
Risk Classification: Serious.
 - The Rockwell 10-inch unisaw does not have a blade guard to prevent inadvertent contact with the blade. A guard should be installed and arranged so that it will automatically adjust itself to a thickness of, and remain in contact with, the material being cut.
Reference: 29 CFR 1910.213(c)(1)
Risk Classification: Serious.
 - The Wissota bench grinder is not equipped with a tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.
Reference: 29 CFR 1910.215(b)(9)
Risk Classification: Serious.
 - One of the work rests on the Wissota bench grinder is out of adjustment. The work rests should be continually adjusted such that the maximum opening between the rests and the wheel is not greater than 1/8 of an inch. This is to prevent an object from being inadvertently jammed between the rest and the wheel, causing wheel breakage.
Reference: 29 CFR 1910.215(a)(4)
Risk Classification: Other-than-serious.

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- The Rockwell drill press is not anchored to the floor to prevent tipping during use.

Reference: 29 CFR 1910.212(b)

Risk Classification: Other-than-serious.

7-3) With regard to emergency first aid equipment, the following deficiency was noted:

- The shops use minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

7-4) One finding pertaining to portable fire extinguishers was noted in this shop.

- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

8) Sheet Metal Shop - House, Rayburn Building

8-1) Regarding personal protective equipment, the following deficiencies were noted:

- Personnel in the shop are not provided with, or required to use, safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

8-2) Several pieces of equipment in the shop were not properly guarded, including:

- The Dyna Corp bench grinder is not equipped with a tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

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- The compressed air gun used for cleaning equipment operates at greater than 30 psi and does not have appropriate guarding.
Reference: 29 CFR 1910.242(b)
Risk Classification: Other-than-serious.
- The Delta drill press is not anchored to the floor to prevent tipping during use.
Reference: 29 CFR 1910.212(b)
Risk Classification: Other-than-serious.
- The work rests on the Dyna Corp bench grinder is out of adjustment. The work rests should be continually adjusted such that the maximum opening between the rests and the wheel is not greater than 1/8 of an inch. This is to prevent an object from being inadvertently jammed between the rest and the wheel, causing wheel breakage.
Reference: 29 CFR 1910.215(a)(4)
Risk Classification: Other-than-serious.

8-3) With regard to emergency first aid equipment, the following deficiency was noted:

- The shops use minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.
Reference: 29 CFR 1910.151(c)
Risk Classification: Serious.

8-4) One finding pertaining to portable fire extinguishers was noted in this shop.

- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.

9) Supply Room - House, Rayburn Building

9-1) Regarding personal protective equipment, the following deficiencies were noted:

- Personnel in the shop are not provided with, or required to use, safety toe footwear.
Reference: 29 CFR 1910.132(a)
Risk Classification: Other-than-serious.

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- 9-2) With regard to emergency first aid equipment, the following deficiency was noted:
- The supply room conducts battery charging for the forklift and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in this supply room.
Reference: 29 CFR 1910.151(c)
Risk Classification: Serious.
- 9-3) There were two deficiencies identified concerning the walking/working surfaces in this shop.
- The loft does not have the floor weight limit posted. This may result in the loft being overloaded, and subsequently collapsing. A structural engineer should determine and post the floor load limit for this loft.
Reference: 29 CFR 1910.22(d)(1)
Serious: Other-than-serious.
 - The loft is missing guardrails at the area near the lower level. Personnel may inadvertently step off the loft without the protection of the guardrails. A system of removable guardrails should be provided and installed. The rails can be removed when forklifts are loading and unloading materials.
Reference: 29 CFR 1910.23(c)(1)
Serious: Other-than-serious.
- 9-4) One finding pertaining to portable fire extinguishers was noted in this shop.
- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.

10) Supply Room - Capitol, Capitol Building

No deficiencies were observed at this location.

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11) Construction Site - Cannon Building

11-1) Scaffolding

- Currently there is only one means of access and exiting from the scaffolding, which is erected for the entire length of the corridor, approximately 300 feet. Such an arrangement creates an excessive common path of travel in the event of a fire. Should the one access-way be blocked by a fire, workers on the scaffold would be forced to jump approximately 8 feet to the floor below from the open end of the scaffold. A second stairway at the far end of the corridor should be erected to the scaffold.

Reference: 20 CFR 1910.37(d)(1)

Risk Classification: Serious.

12) Carpentry Shop - D.C. Village

12-1) Regarding personal protective equipment, the following deficiencies were noted:

- Personnel in the shop are not provided with, or required to use, safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

12-2) Several pieces of equipment in the shop were not properly guarded.

- The circular table saw did not have a blade guard to prevent inadvertent contact with the blade. A guard should be installed and arranged so that it will automatically adjust itself to the thickness of, and remain in contact with, the material being cut.

Reference: 29 CFR 1910.213(c)(1)

Risk Classification: Serious.

- The bench grinder, located at the entrance to the carpentry shop, is missing the tongue guard. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operators as a result of centrifugal forces.

Reference: 29 CFR 1910.215(b)(9)

Risk Classification: Serious.

- The dewalt radial arm saw is not provided with an automatic return. The saw should be arranged such that the front of the unit is slightly higher than the rear, so as to cause the cutting head to return gently to the starting position when released by the operator.

Reference: 29 CFR 1910.213(h)(4)

Risk Classification: Serious.

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- The bench grinder, located at the entrance to the carpentry shop, has one work rest out of adjustment. The work rest should be continually adjusted such that as the wheel wears down, the maximum opening between the rests and the wheel is not greater than 1/8 of an inch. This is to prevent a piece of work from being jammed between the wheel and the rest, causing wheel breakage.

Reference: 29 CFR 1910.215(a)(4)

Risk Classification: Other-than-serious.

- 12-3) Noise levels in this area exceeded 90 decibels, A-weighted (dBA) while the machines were operating. Because these machines may operate for much of the workshift, overexposure to noise is likely. Hearing protection devices were available, but not generally used. A baseline noise survey has apparently not been performed. Exposure to noise above 90 dBA can result in permanent hearing loss.

Reference: 29 CFR 1910.95

Risk Classification: Serious.

- 12-4) With regard to emergency first aid equipment, the following deficiency was noted:

- The shop uses minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.

Reference: 29 CFR 1910.151(c)

Risk Classification: Serious.

- 12-5) One finding pertaining to portable fire extinguishers was noted in this shop.

- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.

Reference: 29 CFR 1910.157(e)(3)

Risk Classification: Other-than-serious.

13) Sheet Metal Shop - D.C. Village

- 13-1) Regarding personal protective equipment, the following deficiency was noted:

- Personnel in the shop are not provided with, or required to use, safety toe footwear.

Reference: 29 CFR 1910.132(a)

Risk Classification: Other-than-serious.

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- 13-2) One finding concerning machine guarding was identified in this shop.
- The standing floor fan is not properly guarded. The existing guard should be modified such that the openings in the guard are not greater than 1/2 inch. This is necessary to ensure personnel do not advertently contact the rotating fan blades.
Reference: 29 CFR 1910.212(a)(5)
Risk Classification: Serious.
- 13-3) With regard to emergency first aid equipment, the following deficiency was noted:
- The shop uses minor amounts of materials that may be injurious to the eyes if contacted, and is not provided with an emergency eye wash fountain. A plumbed, in-place, emergency eye wash fountain, capable of providing a continuous 15 minute supply of water should be installed in the shop.
Reference: 29 CFR 1910.151(c)
Risk Classification: Serious.
- 13-4) One finding pertaining to portable fire extinguishers was noted in this shop.
- There is no documentation that the portable fire extinguishers have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.
- 13-5) Noise levels in this area exceeded 90 decibels, A-weighted (dBA) while the machines were operating. Because these machines may operate for much of the workshift, overexposure to noise is likely. Hearing protection devices were available, but not generally used. A baseline noise survey has apparently not been performed. Exposure to noise above 90 to dBA can result in permanent hearing loss.
Reference: 29 CFR 1910.95
Risk Classification: Serious.
- 13-6) Unlabeled containers of liquid materials were stored in metal cabinets in this shop. MSDSs were not available for other chemicals in use, such as muriatic acid. Employees interviewed have apparently not been provided with hazard awareness training.
Reference: 29 CFR 1910.1200
Risk Classification: Serious.

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14) Construction Site - Jefferson Building

This is an ongoing asbestos abatement project. The audit Team did not enter the containment facility. Work activities were not observed at this site.

- 14-1) With regard to the OSHA Asbestos Regulation the following was noted. According to the Site Supervisor, employees receive OSHA required training, participate in an adequate respiratory protection program, and receive medical examinations. However, records or documentation for any of the above items were not available for review at the site, nor were they available for review at the AOC safety office.

Reference: 29 CFR 1926.58(k)

Risk Classification: Other-than-serious

Report on Occupational Safety and Health Audit of Facilities of the Office of the Attending Physician

GAO Contract No. PC9200041BF
SAIC Project No. 06-0759-04-0315-002

FINAL REPORT

Occupational Safety and Health
Audit of Facilities of the
Office of the Attending Physician
U.S. Congress

September 29, 1992

Submitted to:

General Accounting Office
Human Resources Division

Prepared by:

Robert Reisdorf, CIH
Jeffrey Chapman, CSP

Submitted by:

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**Appendix V
Report on Occupational Safety and Health
Audit of Facilities of the Office of the
Attending Physician**

I. INTRODUCTION

On August 5, 1992, workplace safety and health audits were performed at four First Aid Stations operated by the Office of Attending Physicians (OAP), U.S. Congress, Washington, D.C. The First Aid Stations audited were located in the Rayburn House Office Building (HOB), Longworth HOB, Cannon HOB, and the House Annex I Building. The audits were performed for the General Accounting Office (GAO) under a contract between Science Applications International Corporation (SAIC) and GAO. The audit was performed by Robert Reisdorf, CIH, of SAIC, and Jeffrey Chapman, CSP, of Events Analysis, Inc.

The primary objectives of the audit were to determine whether:

- The safety and health programs and practices in use adequately protect workers
- The safety and health programs and practices meet Occupational Safety and Health Administration (OSHA) requirements.

The audit consisted of discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and reviews of available safety and health documents.

The walk-through inspection was not intended to be a comprehensive OSHA-style safety and health compliance survey, but was designed 1) to give the survey team an overview of potential safety and health hazards; and 2) to determine if major occupational safety and health inadequacies were present throughout the facility, which would indicate a deficiency of major safety program elements.

Evaluation Criteria

OSHA regulations are not currently applicable to Congressional workplaces, including the OAP. However, in order to determine whether or not the occupational safety and health programs and practices observed in the OAP facilities afford the same protection as those in the private sector, the audit team was asked to compare observed programs and practices with OSHA regulations. Consequently, the results of the audit, presented in this report, contain a reference to the relevant OSHA standard for comparison purposes only and do not indicate that OSHA regulations were violated. In addition, a Risk Classification notation of "Serious", or "Other-than-serious" is presented for each of the audit findings. These notations provide the Audit Team's assessment of how an OSHA Compliance Safety and Health Officer (CSHO) might view the conditions if OSHA had regulatory authority over this workplace. The Risk Classification of Serious

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corresponds to the OSHA definition of a Serious Violation which requires that a substantial probability that serious physical harm or death could result from a condition which exists.

Note that in practice the determination of whether or not a particular condition is termed Serious or Other-than-serious can vary depending upon the judgement of the individual CSHO. Furthermore, additional Serious conditions could be identified at a workplace if comprehensive surveys rather than walk-through surveys were performed. A comprehensive survey, which could take several days to complete, might provide new or more detailed information with which to make a determination.

Section II of this report presents a description of the facility that was audited. Section III contains a description of any serious deficiencies that were observed during the audit. Section IV contains a detailed description of the deficiencies noted and includes a reference to OSHA.

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II. FACILITY DESCRIPTION

The Office of Attending Physicians operates four First Aid Stations in House Office Buildings located near the U.S. Capitol. Each First Aid Station is staffed by one or more nurses who are employed by the Architect of the Capitol. The stations have office areas, examining rooms and patient resting/sleeping quarters.

The First Aid Stations that were audited as part of this study were:

- 1) Rayburn HOB
- 2) Longworth HOB
- 3) Cannon HOB
- 4) House Annex I (Annex Health Unit).

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III. SUMMARY

Overview

The OAP shares the responsibility for health and safety with the Architect of the Capitol. The OAP has the primary responsibility of ensuring that its facilities are free from safety and health hazards. The Architect of the Capitol is responsible for the care and maintenance of the buildings in which the audited facilities are located. Personnel in the audited facilities provide routine first-aid services. Other than the potential for contact with bloodborne pathogens, few potentially hazardous conditions are present.

Serious Deficiencies

The audit did not uncover any serious conditions related to occupational safety and health at the four First Aid stations.

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IV. OBSERVATIONS AND FINDINGS

Observations:

1) General (regarding all four stations)

1-1) There is no program to ensure the safe use of chemicals.

- Although the audited areas use few potentially hazardous materials, a list (inventory) of hazardous chemicals has not been developed
- A material safety data sheet (MSDS) for each hazardous chemical was not available for each chemical
- A written hazard communication program has not been developed.
- Employees were apparently aware of chemical and biological hazards, however, formal hazard awareness training has not been provided.

Reference: OSHA 1910.1200

Risk Classification: Other-than-serious.

1-2) There is no written program to address the transmission of bloodborne pathogens. The staff does follow HHS guidelines which address most of the criteria in the OSHA regulation. However, a written Exposure Control Plan to address transmission of bloodborne pathogens has not been developed.

Reference: OSHA 1910.1030

Risk Classification: Other-than-serious.

Report on Occupational Safety and Health Audit of Facilities of the Department of Office Furnishings, Office of the Clerk of the House of Representatives

GAO Contract No. PC9200041BF
SAIC Project No. 06-0759-04-0315-002

FINAL REPORT

Occupational Safety and Health
Audit of the Cabinet, Upholstery,
and Finishing Shops of the
Department of Office Furnishings
Office of the Clerk of the
House of Representatives
U.S. Congress

September 29, 1992

Submitted to:

General Accounting Office
Human Resources Division

Prepared by:

Robert Reisdorf, CIH
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Submitted by:

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**Appendix VI
Report on Occupational Safety and Health
Audit of Facilities of the Department of
Office Furnishings, Office of the Clerk of the
House of Representatives**

I. INTRODUCTION

On August 14, 1992, a workplace safety and health audit was performed at the Cabinet, Upholstery, and Finishing Shops of the Department of Office Furnishings, Office of the Clerk of the U.S. House of Representatives, Washington, D.C. This audit was performed for the General Accounting Office (GAO) under a contract between Science Applications International Corporation (SAIC) and GAO. The audit was performed by Robert Reisdorf, CIH, of SAIC and Leslie White of Events Analysis, Inc.

The primary objectives of the audit were to determine whether:

- The safety and health programs and practices in use adequately protect workers
- The safety and health programs and practices meet Occupational Safety and Health Administration (OSHA) requirements.

The audit consisted of discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and review of available safety and health documents.

The walk-through inspection was not intended to be a comprehensive OSHA-style safety and health compliance survey, but was designed 1) to give the survey team an overview of potential safety and health hazards; and 2) to determine if major occupational safety and health inadequacies were present throughout the facility, which would indicate a deficiency of major safety program elements.

Evaluation Criteria

OSHA regulations are not currently applicable to Congressional workplaces. However, in order to determine whether or not the occupational safety and health programs and practices observed in the Office of the Clerk facilities afford the same protection as those in the private sector, the audit team was asked to compare observed programs and practices with those required by OSHA regulations. Consequently, the results of the audit, presented in this report, contain a reference to the relevant OSHA standard for comparison purposes only and do not indicate that OSHA regulations were violated. In addition, a Risk Classification notation of "Serious", or "Other-than-serious" is presented for each of the audit findings. These notations provide the Audit Team's assessment of how an OSHA Compliance Safety and Health Officer (CSHO) might view the conditions if OSHA had regulatory authority over this workplace. The Risk Classification of Serious corresponds to the OSHA definition of a Serious Violation which requires that serious physical harm or death could result from an existing condition.

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Note that in practice the determination of whether or not a particular condition is termed Serious or Other-than-serious can vary depending upon the judgement of the individual CSHO. Furthermore, additional Serious conditions could be identified at a workplace if comprehensive surveys rather than walk-through surveys were performed. A comprehensive survey, which could take several days to complete, might provide new or more detailed information with which to make a determination.

Section II of this report presents a description of the facility that was audited. Section III contains a description of any serious deficiencies that were observed during the audit. Section IV contains a detailed description of the deficiencies noted and includes a reference to OSHA.

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II. FACILITY DESCRIPTION

The Department of Office Furnishings provides, refurbishes, and inventories the furniture and furnishings for all House offices in Washington, D.C., and operates a number of specialized shops to assist in carrying out this responsibility. The shops are located in the underground area of the Rayburn Building.

Cabinet Shop - The Cabinet Shop employs 18 apprentices and cabinet makers. Employees make and repair desks, cabinets, and other office furnishings. The shop consists of a cabinet room, where light carpentry (gluing, laminating) work is performed, and a machine room/carpentry area, where approximately 15 woodworking machines are used. These machines include belt sanders, band saws, routers, and planers.

Considerable effort has gone into setting up the machine room to enhance work flow and safety features, for example: all machines that can "kick-back" materials have been aligned so that the material would fly into an unoccupied area; each machine has anti skid flooring at the work area; there is an operational dust collection system; and all machine guards were in place.

Upholstery Shop - The upholstery shop employs nine upholsters and trainees. Employees re-upholster furniture. The shop consists of one room where work is performed. Upholstery activities include gluing and light-duty wood work. Very few potentially hazardous activities are performed here.

Finishing Shop - The Finishing Shop employs eight apprentices and journeymen. Employees complete repair work on furniture after it comes back from the cabinet shop. Activities include sanding, staining, painting, and varnishing. A ventilated paint spray booth is located in this area. Also located in this area is the furniture stripping operation.

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III. SUMMARY

Overview

The Office of the Clerk shares the responsibility for health and safety with the Architect of the Capitol (AOC). The Office of the Clerk is responsible for ensuring safe work practices. The AOC is responsible for the care and maintenance of the facility. Few serious hazards were identified during the audit. Other deficiencies were noted which would be considered Other-than-serious. The safety inspections conducted by the shop supervisors apparently address most workplace hazards. Some safety and health programs were found to be inadequate.

Serious Deficiencies

The audit identified the following Serious conditions related to safety and health at the Office of the Clerk.

- 1) A Hazard Communication program has not been implemented. Employees have not received training to address the hazards to which they are exposed. Information, such as Material Safety Data Sheets (MSDSs) are not available to employees.
- 2) A respiratory protection program is not being provided for employees who use respirators.
- 3) The sprinklers in the spray room of the Finishing Shop are located such that they will not be effective in controlling a fire in the paint spray booth.
- 4) The chemical storage room, off of the spray room of the Finishing Shop is improperly vented.
- 5) Excessive amounts of flammable materials are located in the spray room.

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IV. OBSERVATIONS AND FINDINGS

Observations:

1) Cabinet Shop

1-1) There is no program to address the safe use of chemicals.

- A list (inventory) of hazardous chemicals in the Cabinet Shop has not been developed
- A written hazard communication program has not been developed.
- A material safety data sheet (MSDS) was not available for each hazardous chemical.
- Employees have not been provided training regarding the hazards to which they are exposed.
- Some containers of hazardous chemicals were not properly marked and did not show the hazard warning appropriate for employee protection.

Reference: OSHA 1910.1200

Risk Classification: Serious.

1-2) A respiratory protection program is not being provided for appropriate employees. Some employees have been provided half-face air purifying respirators (DeVilbiss Brand) for protection against dust and fumes. However, the employees have not been fit-tested to determine if the respirator is providing adequate protection, nor have employees been trained in the care and cleaning of respirators. In addition, medical examinations have apparently not been performed to determine whether or not the wearer is physically able to use a negative pressure respirator. These deficiencies may cause overexposure of employees to hazardous chemicals.

Reference: OSHA 1910.134

Risk Classification: Serious.

1-3) There is no automatic return for the Dewalt crosscut saw to return it to the rear position when released by the operator. The use of this machine without automatic release could result in injury.

Reference: 29 CFR 1910.213(h)(4)

Risk Classification: Other-than-serious.

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- 1-4) The drill press is not bolted to the floor to prevent it from moving when used. The use of improperly secured equipment could result in injury.

Reference: 20 CFR 1910.212(b)

Risk Classification: Other-than-serious.

- 1-5) The most recent inspection date on the fire extinguishers in the shop was 8/23/89. The lack of a routine inspection program could result in the fire extinguishers not being capable of functioning properly during an emergency.

Reference: 29 CFR 1910.157(e)(1)

Risk Classification: Other-than-serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

2) Upholstery Shop

- 2-1) There was a 1/2" gap vs the recommended 1/8" gap between the tool rest and the wheel on the bench grinder. This increases the probability of the operators fingers being drawn into the wheel if the material being worked on slips into the gap.

Reference: 29 CFR 1910.215(a)(4)

Risk Classification: Other-than-serious.

- 2-2) The most recent inspection date listed on the fire extinguishers in the shop was 1989. The lack of a routine inspection program could result in the fire extinguishers not being capable of functioning properly during an emergency.

Reference: 29 CFR 1910.157(e)(1)

Risk Classification: Other-than-serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

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3) Finishing Shop

- 3-1) A respiratory protection program is not been provided for appropriate employees. Employees in the paint stripper room and paint spray room routinely use respirators to protect against fumes, however respirators were observed to be not properly stored or cared for. In addition there is no medical program to determine if the wearer is physically able to use a respirator nor are fit tests performed to determine if the respirator adequately fits the wearer. The lack of such a program could result in overexposure to toxic materials.

Reference: OSHA 1910.134

Risk Classification: Serious.

- 3-2) There is no program to address the safe use of chemicals.

- A list (inventory) of hazardous chemicals in the Furnishing Shop has not been developed.
- A written hazard communication program has not been developed.
- A material safety data sheet (MSDS) for each hazardous chemical was not available for each chemical.
- Employees have not been provided training regarding the hazards to which they are exposed (e.g., from mixing, handling, and use of solvents, paints, and lacquers).
- Some containers of hazardous chemicals were not properly marked and did not show the hazard warning appropriate for employee protection.

Reference: OSHA 1910.1200

Risk Classification: Serious.

- 3-3) The Fire extinguishers in the stripping room are located on the floor instead of being mounted on the wall. The extinguishers were last inspected in 1989, and one is completely covered with overspray and grime. Improper placement of fire extinguishers could result in their not being available in the event of a fire.

Reference: 29 CFR 1910.157(e)(1)

Risk Classification: Other-than-serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

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- 3-4) The sprinklers in the spray room are located above the roof of the spray booth. In this position they will be less than effective in suppressing a fire in the spray booth.

Reference: 29 CFR 1910.159(a)(2)

Risk Classification: Serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

- 3-5) Instead of the expected one-day supply, there were approximately 50 gallons of flammable liquids stored on an open shelf in the spray room. Storage of excessive amount of flammable materials outside of approved flammable storage cabinets increases the risk of fire.

Reference: 29 CFR 1910.106(d)5

Risk Classification: Serious.

- 3-6) There is mix of standard and rated (explosion proof) electrical equipment (lights and switches) in the spray room. Flammable fumes may ignite if the fumes contact standard electrical equipment.

Reference: OSHA 1910.307(b)

Risk Classification: Other-than-serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

- 3-7) The hazardous materials storage room which contains approximately 500 gallons of material is not equipped with mechanical ventilation. Instead, there is an open ventilation grate to the occupied spray room which results in an increased fire safety hazard.

Reference: 29 CFR 1910.106(d)

Risk Classification: Serious.

Note: Inspection and proper maintenance of this item falls under the jurisdiction of the AOC.

Report on Occupational Safety and Health Audit of the Folding Room, Office of the Doorkeeper of the House of Representatives

GAO Contract No. PC9200041BF
SAIC Project No. 06-0759-04-0315-002

FINAL REPORT

Occupational Safety and Health
Audit of the Folding Room of the
Office of the Doorkeeper of the
House of Representatives
U.S. Congress

September 29, 1992

Submitted to:

General Accounting Office
Human Resources Division

Prepared by:

Robert Reisdorf, CIH
Leslie White
Jeffrey Chapman, CSP

Submitted by:

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**Appendix VII
Report on Occupational Safety and Health
Audit of the Folding Room, Office of the
Doorkeeper of the House of Representatives**

I. INTRODUCTION

On August 7, 1992, a workplace safety and health audit was performed at the Publications Distribution Service (Folding Room) of the Office of the Doorkeeper, of the House of Representatives in Washington, D.C. This audit was performed for the General Accounting Office (GAO) under a contract between Science Applications International Corporation (SAIC) and GAO. The audit was performed by Robert Reisdorf, CIH, of SAIC, and Leslie White, and Jeffrey Chapman, CSP, of Events Analysis, Inc.

The primary objectives of the audit were to determine whether:

- The safety and health programs and practices in use adequately protect workers
- The safety and health programs and practices meet Occupational Safety and Health Administration (OSHA) requirements.

The audit consisted of discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and reviews of available safety and health documents.

The walk-through inspection was not intended to be a comprehensive OSHA-style safety and health compliance survey, but was designed 1) to give the survey team an overview of potential safety and health hazards; and 2) to determine if major occupational safety and health inadequacies were present throughout the facility, which would indicate a deficiency of major safety program elements.

Evaluation Criteria

OSHA regulations are not currently applicable to workplaces within the Office of the Doorkeeper. However, in order to determine whether or not the occupational safety and health programs and practices observed in the Folding Room afford the same protection as those in the private sector, the audit team was asked to compare observed programs and practices with those required by OSHA regulations. Consequently, the results of the audit, presented in this report, contain a reference to the relevant OSHA standard for comparison purposes only and do not indicate that OSHA regulations were violated. In addition, a Risk Classification notation of "Serious", or "Other-than-serious" is presented for each of the audit findings. These notations provide the Audit Team's assessment of how an OSHA Compliance Safety and Health Officer (CSHO) might view the conditions if OSHA had regulatory authority over this workplace. The Risk Classification of Serious corresponds to the OSHA definition of a Serious Violation which requires that a substantial probability that serious physical harm or death could result from an existing condition.

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Note that in practice the determination of whether or not a particular condition is termed Serious or Other-than-serious can vary depending upon the judgement of the individual CSHO. Furthermore, additional Serious conditions could be identified at a workplace if comprehensive surveys rather than walk-through surveys were performed. A comprehensive survey, which could take several days to complete, might provide new or more detailed information with which to make a determination.

Section II of this report presents a description of the facility that was audited. Section III contains a description of any serious deficiencies that were observed during the audit. Section IV contains a detailed description of the deficiencies noted and includes a reference to OSHA.

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II. FACILITY DESCRIPTION

The Folding Room is located in the Longworth House Office Building, Washington, D.C. and actually consists of several connected rooms all located on the ground floor of this building. In addition to the Longworth Building facilities, there is a room in the Cannon Building where related Folding Room activities take place.

There are approximately 400 employees under the Office of the Doorkeeper. The Doorkeeper oversees a number of activities in addition to the Folding Room. However, the Folding Room contains most of the potentially hazardous operations managed by the Office of the Doorkeeper.

The Folding Room has 168 employees. The main activity of the Folding Room is the folding and preparation of congressional letters and newsletters for mailing. The Folding Room areas contain a number of folding and sorting machines.

III. SUMMARY

Overview

The Folding Room shares the responsibility for health and safety with the Architect of the Capitol (AOC). The Folding Room is responsible for ensuring safe work practices. The AOC is responsible for the care and maintenance of the facility. Several deficiencies were noted which would constitute serious unsafe work practices or noncompliance with OSHA regulations. Other deficiencies were noted which would be considered Other-than-serious.

Serious Deficiencies

The audit identified the following serious conditions related to occupational safety and health at the Folding Room. Not all of these conditions fall under the jurisdiction of this office.

- 1) An effective hearing conservation program is not being fully implemented.
- 2) Two serious conditions of electrical safety standards were noted, including the absence of a machine lock-out/tag-out program. (See Observation 3).
- 3) Two serious conditions of fire safety standards were noted (See Observation 4).
- 4) Several machines in the Folding Room are not equipped with engineering controls and other safety features.
- 5) Emergency eyewash stations are not available at locations where they are needed/required.

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IV. OBSERVATIONS AND FINDINGS

Observations:

- 1) An effective hearing conservation program is not being provided at this workplace. Noise levels at the operator's position and catchers position of the Folding Machines ranged from 97 to 98 decibels, A-weighted (dBA), while the machines were operating. Because these machines may operate for much of the work shift, an overexposure to noise is likely in these areas. Hearing protection devices were available to all employees, however, many employees were observed not wearing protection. Exposure to noise above 90 dBA on a regular basis is likely to result in hearing loss.

Reference: OSHA 1910.95(c)

Risk Classification: Serious.

Note: According to the Folding Room Director a noise survey was conducted by the AOC, the results of which indicated that a noise hazard did not exist. Nevertheless, because of obvious high noise levels, hearing protection was made available to all employees and its use was encouraged. The Director indicated that the Office of the Doorkeeper did not have the authority to make the use of hearing protection mandatory nor does this Office have the administrative authority to discipline an employee for not wearing hearing protection or any other safety device.

- 2) Although few chemicals are used at this facility, there is no program to ensure their safe use.
- A complete list (Inventory) of hazardous chemicals in the Folding Room has not been developed
 - A written hazard communication program has not been developed
 - A material safety data sheet (MSDS) for each hazardous chemical was not available for each chemical
 - Employees reported that they have not received hazard awareness training
 - Some containers of hazardous chemicals were not properly marked and did not show the hazard warning appropriate for employee protection.

Reference: OSHA 1910.1200

Risk Classification: Other-than-serious.

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3) Regarding electrical safety, the following deficiencies were noted:

- There is no written lock-out/tag-out program in effect for personnel who perform work in and around energized equipment. A lock-out/tag-out program would require equipment to be shut off as close as possible to the piece of equipment and either locked or tagged to prevent the unit from being turned on. In the absence of such a program employees could likely be injured if a machine were turned on during maintenance or repair.
Reference: 29 CFR 1910.147(c)(1)
Risk Classification: Serious.
- Access to the electrical panel box, located adjacent to the water fountain at the entrance to the Optical Character Reading area, is blocked by the storage of equipment, and the minimum 36 inches of clearance has not been maintained. In the event of an emergency, access to circuits controlled by this panel would be delayed.
Reference: 29 CFR 1910.303(g)(3)
Risk Classification: Other-than-serious.
- The electrical panel box, located adjacent to the water fountain at the entrance to the Optical Character Reading area, is missing the panel cover, thereby exposing live electrical parts. This condition presents an electrical shock hazard.
Reference: 29 CFR 1910.305(d)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- An electrical extension cord connected to a hot plate is routed under a metal file cabinet in the Inserting area. The edge of the metal file cabinet may damage the insulation of the wire presenting an electrical shock hazard. In the addition, the wire felt hot to the touch at the time of the audit and may be undersized for it's present use.
Reference: 29 CFR 1910.303(b)
Risk Classification: Serious.
- The electrical junction box located on the wall by the battery charging station in the Hand Unit, is missing the cover, exposing live electrical parts.
Reference: 29 CFR 1910.305(b)(2)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- A series of electrical controls on the corridor wall by the Hand Unit have been padlocked in the open position (ON). These controls are not labeled as to what they operate. Improperly labeled electrical controls may impair the shut down of equipment during emergencies.
Reference: 29 CFR 1910.147(c)(1)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.

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- 4) Several findings pertaining to fire protection and/or life safety issues were noted.
- The portable fire extinguisher at the main entrance to the Optical Character Reading area was missing from the designated location. In the event that a fire extinguisher is needed in an emergency, personnel will have to search for the missing extinguisher.
Reference: 29 CFR 1910.157(c)(1)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
 - There are no exit signs indicating the direction of egress from the Optical Character Reading area. In the event of an emergency, personnel not familiar with the facility may not be able to rapidly exit the area due to the lack of exit signs.
Reference: 29 CFR 1910.37(q)(1)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
 - Numerous old style electrical coil hot plates and electrical broilers were found throughout the folding room. These appliances present a serious potential fire hazard.
Reference: 29 CFR 1903.1
Risk Classification: Serious.
Note: The hot plates in use throughout the folding room are used for the preparation of food at employee workstations. This practice presents obvious safety hazards. According to the Director, the practice is strongly discouraged, however, the Office of the Doorkeeper lacks the authority to prohibit this practice. Alternate employee lunch facilities are not available nor is there adequate space within the Folding Room to designate an employee eating/break area.
 - The portable fire extinguishers for the Inserting Machine, the folding area between the front and rear sections, and the stock room were not mounted on the wall. In the event of an emergency, the extinguishers may not be readily visible for personnel to locate them.
Reference: 29 CFR 1910.157(c)(1)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
 - The emergency exit from the House cafeteria, adjacent to the Folding Room, leads through an area of higher hazard (i.e., the Postal Unit of the Folding Room) and there are few exit signs indicating the direction of egress. In the event of an emergency, personnel evacuating the cafeteria through this area may become lost and/or disoriented, placing themselves in jeopardy.
Reference: 29 CFR 1910.37(q)(1)
Risk Classification: Serious.
Note: This condition falls under the jurisdiction of the AOC.

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- The exit sign at the front of the Postal Patron Unit is not operational. The absence of an exit sign could impair egress in the event of an emergency.
Reference: 29 CFR 1910.37(q)(6)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- There is no documentation that the portable fire extinguishers located throughout all of the Folding Room have been subjected to an annual maintenance check to ensure that they will operate in the event they are needed.
Reference: 29 CFR 1910.157(e)(3)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- There is storage in the aisles throughout all of the Folding Room, decreasing the corridor widths to less than 44 inches, which may impede egress in the event of an emergency.
Reference: 29 CFR 1910.37(f)(1)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- Sprinkler heads have not been placed under ducts that are wider than four feet in the area adjacent to the Hand Unit. In the event of a fire, the existing sprinklers would not be able to protect the area immediately under the ducts.
Reference: 29 CFR 1910.159(a)(2) and (c)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- There are two sprinkler heads located in the IBM room that are closer than six feet apart. The operation of one of the heads may cool the second head, delaying its activation and allowing a fire to spread. One head should be relocated such that it is not closer than 6 feet, nor more than 15 feet from the adjacent head.
Reference: 29 CFR 1910.159(a)(2) and (c)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.
- Access to the portable fire extinguisher in the Kodak Room of the Cannon Building is blocked by storage or materials. In the event of fire, employees may not be able to locate this unit.
Reference: 29 CFR 1910.157(c)(1)
Risk Classification: Other-than-serious.
- The stock room is larger than 1,000 square feet in area and is not protected by automatic sprinklers. This presents a potential fire hazard.
Reference: 29 CFR 1910.159(a)(2)
Risk Classification: Other-than-serious.
Note: Inspection and proper maintenance of this item is the responsibility of the AOC.

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- 5) The following machine guarding deficiencies were noted.
- The four old style (built in 1962) Bell & Howell Inserting machines are not properly guarded. Personnel working with this equipment are exposed to numerous moving and/or rotating parts in which they may become entangled. Such a practice places employees at serious risk of injury.
Reference: 29 CFR 1910.219(c)(4)
Risk Classification: Serious.
 - The rotating shaft ends on the Cheshire Spray machine, model 697, are not guarded. Loose clothing could become caught on the shaft ends, causing injury.
Reference: 29 CFR 1910.219(c)(4)
Risk Classification: Other-than-serious.
 - Personnel were observed clearing a jam on one of the Baumfolder machines while the equipment was in operation. Such a practice places the personnel at serious risk of injury should his hands be caught in the moving parts. Jams should only be cleared with the equipment off and locked and tagged out of service.
Reference: 29 CFR 1910.147(c)(1)
Risk Classification: Serious.
 - The bench grinder located in the mechanic's room is not anchored to the bench to prevent it from tipping over during use.
Reference: 29 CFR 1910.212(b)
Risk Classification: Other-than-serious.
 - The bench grinder located in the mechanic's room is not equipped with tongue guards. Tongue guards should be installed and continually adjusted as the grinding wheels wear down, such that the maximum opening between the guard and the grinder is less than 1/4 of an inch. These guards serve to prevent broken pieces of the wheels from being ejected into the operator as a result of centrifugal forces.
Reference: 29 CFR 1910.215(b)(9)
Risk Classification: Other-than-serious.
 - The bench grinder located in the mechanic's room is not provided with tool rests. Tool rests are necessary to provide a surface to hold the piece being worked on. The tool rests should be continually adjusted such that the maximum opening between the rests and the wheel is not greater than 1/8 of an inch. This is to prevent an object from being inadvertently jammed between the rest and the wheel, causing wheel breakage.
Reference: 29 CFR 1910.215(a)(4)
Risk Classification: Other-than-serious.
 - The table fan by the rear wall of the Inserting area is not properly guarded. This condition would allow accidental contact with the fan blade and presents serious risk of injury. The existing guard should be modified such that the openings are not larger than 1/2 inch.
Reference: 29 CFR 1910.212(a)(5)
Risk Classification: Serious.

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- 6) Regarding emergency first aid equipment, the following deficiencies were noted:
- The mechanic's room uses minor amounts of materials that may be injurious to the eyes if contacted. This room is not provided with an emergency eye wash fountain.
Reference: 29 CFR 1910.151(c)
Risk Classification: Other-than-serious.
 - The emergency eye wash fountain, located adjacent to the battery charging area by the Hand Unit, is not connected for service, and access to the unit is blocked by the placement of a coat rack. The absence of an operating eye wash station in this area presents a serious risk of eye injury.
Reference: 29 CFR 1910.151(c)
Risk Classification: Serious.

Report on Occupational Safety and Health Audit of Facilities of the U.S. Government Printing Office

GAO Contract No. PC9200041BF
SAIC Project No. 06-0759-04-0315-002

FINAL REPORT

Occupational Safety and Health
Audit of the Quality Control and
Technical Department, Press Division,
and Binding Division of the
U.S. Government Printing Office

September 29, 1992

Submitted to:

General Accounting Office
Human Resources Division

Prepared by:

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**Appendix VIII
Report on Occupational Safety and Health
Audit of Facilities of the U.S. Government
Printing Office**

I. INTRODUCTION

On August 11 and 12, 1992, a workplace safety and health audit was performed at the Quality Control and Technical Department (QC/TD), Press Division and Binding Division of the U.S. Government Printing Office (GPO) in Washington, D.C. This audit was performed for the General Accounting Office (GAO) under a contract between Science Applications International Corporation (SAIC) and GAO. The audit was performed by Robert Reisdorf, CIH, of SAIC, and Leslie White of Events Analysis, Inc.

The primary objectives of the audit were to determine whether:

- The safety and health programs and practices in use adequately protect workers
- The safety and health programs and practices meet Occupational Safety and Health Administration (OSHA) requirements.

The audit consisted of discussions with appropriate supervisors, walk-through inspections of the facilities, brief interviews with selected employees, and reviews of available safety and health documents.

The walk-through inspection was not intended to be a comprehensive OSHA-style safety and health compliance survey, but was designed 1) to give the survey team an overview of potential safety and health hazards; and 2) to determine if major occupational safety and health inadequacies were present throughout the facility, which would indicate a deficiency of major safety program elements.

Evaluation Criteria

OSHA does not currently have regulatory authority over the GPO. However, in order to determine whether or not the occupational safety and health programs and practices observed in the GPO facilities afford the same protection as those in the private sector, the audit team was asked to compare observed programs and practices with those required by OSHA regulations. Consequently, the results of the audit, presented in this report, contain a reference to the relevant OSHA standard for comparison purposes only and do not indicate that OSHA regulations were violated. In addition, a Risk Classification notation of "Serious", or "Other-than-serious" is presented for each of the audit findings. These notations provide the Audit Team's assessment of how an OSHA Compliance Safety and Health Officer (CSHO) might view the conditions if OSHA had regulatory authority over this workplace. The Risk Classification of Serious corresponds to the OSHA definition of a Serious Violation which requires that a substantial probability that serious physical harm or death could result from a condition which exists.

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Note that in practice the determination of whether or not a particular condition is termed Serious or Other-than-serious can vary depending upon the judgement of the individual CSHO. Furthermore, additional Serious conditions could be identified at a workplace if comprehensive surveys rather than walk-through surveys were performed. A comprehensive survey, which could take several days to complete, might provide new or more detailed information with which to make a determination.

Section II of this report presents a description of the facility that was audited. Section III contains a description of any serious deficiencies that were observed during the audit. Section IV contains a detailed description of the deficiencies noted and includes a reference to OSHA.

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Report on Occupational Safety and Health
Audit of Facilities of the U.S. Government
Printing Office**

II. FACILITY DESCRIPTION

The QC/TD, Press Division, and Binding Division are located in the GPO building at North Capitol and H Streets, NW Washington, D.C. The GPO building has 8 floors and actually consists of three buildings which have been combined as one. The building contains approximately 1.2 million square feet of floor space.

The GPO employs approximately 3000 workers at this (and adjacent) buildings. The three operations/divisions audited as part of the study represent about 40% of the floor space and 25% of the total workforce. The audited operations contain most of the potentially hazardous operations within the GPO complex. These operations work 3 shifts per day. The following is a description of the three operations that were audited.

The **Quality Control and Technical Department** is located on the fifth floor of the GPO complex and consists of 4 or 5 rooms used as laboratories along with associated offices. The QC/TD has 38 employees, 12 of whom are chemists. The QC/TD performs chemical and physical tests on inks and performs ink specification designs. Chemical fume hoods are available and are routinely used for chemical tests.

The **Press Division** is located on the second, fifth, and seventh floors of the GPO complex. This Division has numerous offset and letterpress printing presses and has associated departments that perform copy preparation, photography, film development, film cleaning, and letterpress and offset plate making. The Press Division employs approximately 700 workers.

The **Binding Division** is located on the third, fourth, and fifth floors of the GPO complex. Employees of the division operate equipment that cuts, binds, folds, and labels documents. Manual labeling and specialty binding is also performed. Approximately 600 workers are employed in this division.

III. SUMMARY

Overview

The GPO has a well established safety and health program which is administered by Occupational Health and Environmental Services and its Safety Branch. GPO has developed and implemented most of the OSHA required written safety and health programs that are appropriate for this workplace. Overall, the GPO health and safety program meets or exceeds that typically found in general industry. However, several deficiencies were observed, which would constitute noncompliance with OSHA regulations.

Serious Deficiencies

The audit identified the following serious conditions related to occupational safety and health at the three GPO Divisions.

1. Employees of QC/TD laboratory areas are permitted to eat and drink at work areas where toxic chemicals are used.
2. An effective hearing conservation program is not being fully implemented in the high noise areas of the Binding Division (See observation 3-1).
3. Several machines in the Binding and Press Divisions were not equipped with proper safety devices.

IV. OBSERVATIONS AND FINDINGS

Observations:

1) Quality Control and Technical Department

1-1) The program to address the safe use of chemicals is not being fully implemented.

- A list (inventory) of hazardous chemicals in the QC/TD has not been developed
- A material safety data sheet (MSDS) were not available for each hazardous chemical.
- Some containers of hazardous chemicals were not properly marked and did not show the hazard warning appropriate for employee protection.

Other elements of this program, including hazard awareness training, have been provided, consequently this condition is not rated Serious.

Reference: OSHA 1910.1200

Risk Classification: Other-than-serious.

1-2) There is no written program that specifically addresses the safe use of chemicals in laboratories. A written Chemical Hygiene Plan, as required under the OSHA Laboratory Standard, has not been developed for the laboratory areas. The primary components of Chemical Hygiene Plans include the development of standard operating procedures for chemical use, and specific chemical hazard training for employees. Because other hazard awareness training has been provided, this deficiency was not considered Serious.

Reference: 1910.1450

Risk Classification: Other-than-serious.

1-3) There was evidence that personnel eat and drink in the laboratory spaces, e.g., several coffee pots were located in the laboratory areas; an individual was observed filling a drinking glass with ice from a chest marked "For Laboratory Use Only;" and there were empty food wrappers in several waste cans in the laboratory area. Eating and drinking in the laboratory spaces increases the probability of inadvertently ingesting hazardous materials.

Reference: 29 CFR 1910.141(g)(2)

Risk Classification: Serious.

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- 1-4) An electrical extension cord runs from a computer terminal, across the doorway of the Laboratory Director's office, to a receptacle in the adjacent wall. This may present a tripping hazard to anyone walking through the doorway.

Reference: 29 CFR 1910.22(a)(1)

Risk Classification: Other-than-serious.

- 1-5) Two motor-driven pieces of test apparatus in Room 511 have partially exposed pulleys and belts. The use of machines without proper guards could result in injury.

Reference: 29 CFR 1910.212(a)(1)

Risk Classification: Other-than-serious.

- 1-6) There are exposed electrical contacts on the speed regulator for the laboratory paper shredder. Contact with the energized contacts could result in electrical shock. However, the contacts are difficult to access and consequently the risk is not considered Serious. Laboratory personnel have posted signs warning of the potential contact with the energized leads.

Reference: 29 CFR 1910.303 (g)(2)(i)

Risk Classification: Other-than-serious.

2) Press Division

- 2-1) Containers of unlabeled chemicals were observed at several work stations in the press areas. Handling unlabeled/unknown chemicals can cause accidents or overexposure to hazardous chemicals.

Reference: OSHA 1910.1200

Risk Classification: Other-than-serious.

- 2-2) On letter press GPO No. 1835, there is a 24 inch unguarded flywheel that rotated at a high speed. This presents a risk of serious injury if loose clothing catches in the wheel.

Reference: 29 CFR 1910.212(a)(3)(ii)

Risk Classification: Serious.

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- 2-3) The series of belts and pulleys associated with the paper roll mechanism on the Group 88 presses are unguarded. Operator's fingers and clothing may get caught in these moving parts. Given the exposure to these large, high speed, pulleys and belts during paper changing operations, the risk is considered to be serious.

Reference: 29 CFR 1910.212 (a)(3)(ii).

Risk Classification: Serious.

3) **Binding Division**

- 3-1) An effective hearing conservation program is not being provided at this workplace. Noise levels at the operator's position at the MBO Folding Machine, the Dexter-Cleveland Folding Machine, and the Harris Adhesive Binding Machine, ranged from 90 to 94 decibels, A-weighted (dBA) while the machines were operating. Because these machines, along with other similar machines, may operate for much of the work shift, an overexposure to noise is likely in these areas. Hearing protection devices were available to employees, however, the use of hearing protection was not enforced at any of these areas. Exposure to noise above 90 dBA on a regular basis is likely to result in hearing loss.

Reference: 1910.95(c)

Risk Classification: Serious.

- 3-2) Work quantities (quart sized or smaller) of several solvents are kept in unlabeled containers at several folding machine operators' stations and in the stamping area. Handling unlabeled/unknown solvents presents a risk of fire or overexposure. Because the quantity of material involved is small the overall risk is rated Other-than-Serious.

Reference: 1910.1200

Risk Classification: Other-than-Serious.

- 3-3) Several partially filled open 5-gallon cans of unknown, unlabeled materials were present at the waste storage/collections areas on the fifth floor. Handling unlabeled/unknown solvents presents a risk of fire or overexposure to toxic materials. Because the quantity of material involved is small the overall risk is rated Other-than-Serious.

Reference: 1910.1200

Risk Classification: Other-than-Serious.

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- 3-4) Unguarded belts and pulleys were observed at the Congressional Record carousel. Contact with these moving machine parts may result in injury. The location of these pulleys in the rear, normally unoccupied area of the machine, tends to minimize the probability of direct contact.

Reference: 29 CFR 1910.212(a)(3)(ii)

Risk Classification: Other-than-serious.

- 3-5) The two paper drilling machines were not equipped with point of operation guards. It is possible for the operator to have his or her hand under the drill when the machine is placed in operation. The use of machines without proper guards increases the potential for injury.

Reference: 29 CFR 1910.212(a)(3)(ii)

Risk Classification: Serious.

- 3-6) The cardboard Stock Cutter at column 3E16 has unguarded pinch points at the pulleys and blade, which are within the reach of the operator. The use of machines without proper guards increases the potential for injury.

Reference: 29 CFR 1910.212(a)(3)(ii)

Risk Classification: Other-than-serious.

Comments From the Office of the Architect of the Capitol



Washington, DC 20515

September 24, 1992

Ms. Linda G. Morra
Director, Education and
Employment Issues
Human Resources Division
United States
General Accounting Office
Washington, D.C. 20548

Re: GAO Draft Report regarding Occupational Safety and
Health Audit dated September 15, 1992.

Dear Ms. Morra:

The primary objectives of the audit were, as stated on page 1, to determine whether:

- o The safety and health programs and practices of the Office of the Architect of the Capitol (AOC) adequately protect workers.
- o The safety and health programs and practices of the AOC meet OSHA requirements.

As stated in the report, this walk-through inspection was not intended to be a comprehensive survey; and it was obviously not of that level. The Audit team did not review the safety policies and procedures as developed and distributed by the AOC. The Audit team relied on brief interviews with selected employees but did not review appropriate documentation that illustrated that the AOC does emphasize safety in the workplace. They did find certain deficiencies in the handling and use of certain specific pieces of shop machinery. This is very useful and we will address these and similar items immediately. These are important in themselves; however, considering the scope and variety of activities of the AOC, the noted deficiencies are of

Now on p. 25.

Ms. Linda G. Morra (GAO)
September 24, 1992
Page 2 of 4

relatively small magnitude when considering the size of the shops, the large inventory of equipment within each shop and the small number of injuries as reflected by accident reports. As indicated in the report, the determination of whether or not a particular condition is termed Serious or Other-than-serious is dependent on the judgment of the inspector. All safety deficiencies are, however, of major concern to the AOC.

Attached are supplementary documents that will assist in the preparation of the Final Audit Report.

- Comments on the Draft Report offered by Charles E. Bowman, Head, Safety Engineering Division.
- Copy of the AOC Program for Safety and Health as distributed to all Building Superintendents and Shop Foremen and reviewed in employee safety training sessions.
- Copies of documents that illustrate concern for training of those involved in handling asbestos.
- Copies of documents that illustrate that specific personnel that handle asbestos are given health examinations including the ability to use respirators.
- Copies of listings of training aids that have been used and are available for future sessions.
- Copies of documents that illustrate our program for removing hazardous waste, including the handling of material safety data sheets.
- Copies of documents that illustrate our program for improving the fire and life safety of these monumental and aged buildings.
- Copies of documents that illustrate our program for maintenance of portable fire extinguishers, and regular inspection of kitchen range hood fire extinguishing systems.

Extensive reading and reference material regarding safety was assembled several years ago for each different shop and delivered to each Shop Foreman.

**Appendix IX
Comments From the Office of the Architect
of the Capitol**

Ms. Linda G. Morra (GAO)
September 24, 1992
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Now on pp. 30 and 31.

The following is offered in response to the eight (8) comments listed on pages 7 and 8 as Serious Deficiencies:

1. Basic hazard awareness training has been provided to certain specific personnel and a more formal Hazard Communication Program is being developed by the Safety Engineering Division.
2. Surveys of high noise areas have been conducted on an informal basis. More emphasis and concern is needed in this regard.
3. A lock-out/tag-out program will be activated immediately.
4. An occupant emergency plan has been in preparation for some time. However, emergency evacuation becomes a matter of policy of the Congress and there has not been agreement on this issue as it may affect the operation of the Congress. We have a major program for the installation of sprinklers, smoke detectors and fire alarm systems, including evacuation instructions, in all buildings in the Capitol Complex as represented by the summary attached.
5. There is not a written confined-space-entry program. However, our supervisors are very conscious of the inherent dangers and more effort will be given to training affected personnel.
6. Employees that use respirators are instructed in their proper use. However, more supervision will be exercised in the future.
7. As stated in the Audit, there are various shop machines that require improved safety measures. This issue will be addressed immediately.
8. Emergency eyewash stations will be installed immediately in all required areas.

As a result of the Audit Report, a meeting has been scheduled with all Building Superintendents to review and emphasize all matters relating to Safety and Health.

Our appropriations request for the past two years, and in the future, specifically includes increased levels of funding for medical examinations of personnel where deemed necessary, and for hazardous materials control and disposal. We have strong programs in the areas of asbestos

**Appendix IX
Comments From the Office of the Architect
of the Capitol**

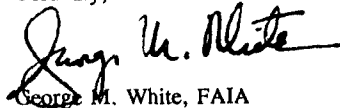
Ms. Linda G. Morra (GAO)
September 24, 1992
Page 4 of 4

and PCB removal and disposal. We also have control over the handling and disposal of all other hazardous waste. We apparently need additional instruction to personnel concerning labeling of containers.

Our personnel involved in construction, both within the buildings as well as external to the buildings, are well supervised and instructed in matters relating to safety in the workplace. We have written safety instructions that are distributed to every new worker and our construction supervisors are diligent in policing the workplace. In addition, safety inspections are conducted on a regular basis by staff of the Safety Engineering Division.

As with any organized program over a period of time, there is room for change and improvement. We believe that we have an excellent safety program that affords the same protection as that in the private sector. We appreciate the observations of the Audit Team and will pursue corrective action; particularly with those items noted in the Report.

Cordially,



George M. White, FAIA
Architect of the Capitol

Comments From the Office of the Attending Physician

THE ATTENDING PHYSICIAN
CONGRESS OF THE UNITED STATES

ROBERT C.J. KRASNER, M.D.

September 21, 1992

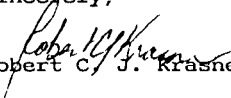
Linda G. Morra
United States
General Accounting Office
Washington D.C. 20548

Dear Ms. Morra:

In response to your letter of September 16, 1992 the following comments are provided. In reference to my administrators conversation with Mr. John Carney of your office, the overview statement on page 4 is not representative of our responsibilities and should be rewritten.

We have no other comments at this time regarding any other areas of your draft report. If any further discussion or action on this matter is necessary, please contact Mr. Robert Burg at (202) 225-5421.

Sincerely,


Robert C. J. Krasner, M.D.

Now on p. 53; statement has been rewritten.

Comments From the Office of the Clerk of the House of Representatives

Donald K. Anderson
Clerk

M. Raymond Colley
Deputy Clerk

Office of the Clerk
U.S. House of Representatives
Washington, DC 20515-6601

September 24, 1992

Ms. Linda G. Morra, Director
Education and Employment Issues
U.S. General Accounting Office
Washington, D.C. 20548

Dear Ms. Morra:

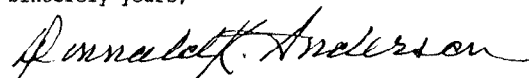
I herewith enclose with this letter the five (5) copies of the draft report summarizing the results of occupational safety and health audits of the Cabinet, Upholstery and Finishing Shops of the Department of Office Furnishings, Office of the Clerk. These reports were transmitted to me in your letter of September 15th.

After reviewing this draft report, I do not wish to provide comments for inclusion in the final report. The draft report seems a factual summary of the general information presented in our meeting and discussion on August 26, 1992.

I do wish to inform you, personally, that my staff confirms correction of the described deficiencies has been vigorously undertaken and will soon be completed. If a member of your staff should wish to review the situation at some future date, we would welcome such a visit in our shops. Please contact me directly if you should plan a further visit.

With appreciation for your services to the Clerk's Office, I am

Sincerely yours,



DONNARD K. ANDERSON, Clerk
U.S. House of Representatives

Enclosures - 5 copies Draft Report

Comments From the Office of the Doorkeeper of the House of Representatives

JAMES T. MOLLOY
DOORKEEPER

Office of the Doorkeeper
U.S. House of Representatives
Washington, DC 20515

September 17, 1992

Linda G. Morra
Director of Education and Employment Issues
U.S. General Accounting Office
441 G Street, N.W.
Washington, DC 20548

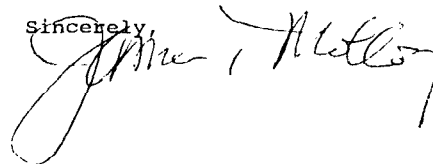
Dear Ms. Morra:

I have received and reviewed the draft report summarizing the results of the Occupational Safety and Health Audit of the Publications Distribution Service. The information provided to us by this audit is greatly appreciated and will be of benefit to us as we continue our efforts to provide the best possible working environment for our employees.

My office has already begun to address the deficiencies noted in your report. A brief summary of action being taken is attached.

Again, thank you and your staff for your assistance.

Sincerely,



JTM/jjk
enclosure

**Appendix XII
Comments From the Office of the
Doorkeeper of the House of Representatives**

JAMES T. MOLLOY
DOORKEEPER

**Office of the Doorkeeper
U.S. House of Representatives
Washington, DC 20515**

MEMORANDUM

RE: USGAO Occupational Safety and Health Audit of PDS
Summary of Action Addressing Deficiencies
Report Part IV. Observations and Findings

- 1) The AOC will be requested to upgrade noise abatement wall covering as part of the Publications Distribution Service remodeling request already submitted to this office.
- 2) The Lead Mechanic has developed a list of the hazardous chemicals, a written communications program has been developed and implemented, MSD sheets have been requested from all suppliers, employees have been trained in the use of the chemicals, and all containers have been properly marked.
- 3)a) The AOC will be requested to provide the electrical fittings required for the lock-out/tag-out program.
 - b) The AOC will be requested to review access to the electrical panel box adjacent to the water fountain at the entrance to the OCR.
 - c) The AOC will be requested to replace the electrical panel box cover.
 - d) The AOC will be requested to review wiring needs to accommodate employees' hot plates.
 - e) The AOC will be requested to replace the electrical panel box cover.
 - f) The AOC will be requested to label the electrical controls on the corridor wall by the Hand Unit.
- 4)a) The AOC will be requested to replace the portable fire extinguishers removed by the AOC at the entrance to the OCR area.
 - b) The AOC will be requested to install exit signs in the OCR area.
 - c) cf. 3(d)
 - f) The AOC will be requested to mount the portable fire extinguishers for the Insert, Folding and Stock Units.

**Appendix XII
Comments From the Office of the
Doorkeeper of the House of Representatives**

- g) The AOC will be requested to review the emergency exit from the LHOB cafeteria through the Publications Distribution Service.
- h) The AOC will be requested to repair the exit sign at the front of the Postal Patron Unit.
- i) The AOC will be requested to certify the maintenance of the portable fire extinguishers in the Publications Distribution Service.
- j) Storage in Publications Distribution Service aisles which decrease corridor width has been halted.
- k) The AOC will be requested to review the placement of sprinkler heads in the Hand Unit.
- l) The AOC will be requested to review the placement of the sprinkler heads in the IBM Room.
- m) The machine blocking access to the portable fire extinguisher in the CHOB Kodak Room has been relocated.
- n) The AOC will be requested to review the need for automatic sprinklers in the Stock Unit.
- 5) a) The manufacturer has stated that retrofitting with shields is not possible. Publications Distribution Service is currently updating machinery and will request new machines as replacements.
 - b) We are awaiting a response from Cheshire on installing guards on the rotating shaft ends of the Cheshire bases.
 - c) Machine Operators have been readmonished on proper procedures for cleaning machines.
 - d) The bench grinder has been anchored to the bench.
 - e) Tongue guards for the bench grinder are on order.
 - f) Tool rests have been mounted on the bench grinder.
 - g) The table fan has been removed.
- 6) a) The AOC will be requested to install an emergency eye wash fountain in the mechanic's room.
 - b) i) The AOC will be requested to complete the installation of the emergency eye wash station by the Hand Unit. The AOC failed to connect the installed unit to water.
 - ii) The coat rack has been relocated.

Comments From the U.S. Government Printing Office



United States Government Printing Office
Washington, DC 20401

September 29, 1992

Linda G. Morra
Director, Education and Employment Issues
Human Resources
US General Accounting Office

Dear Ms. Morra:

Enclosed is GPO's response to GAO's September 18, 1992 Draft report concerning certain limited GPO operations. Our response focuses on responding to the specific items addressed in your report. Overall we find the draft report to be basically accurate. However, we are concerned that this report does not appear to reflect the substance of the briefing that your staff provided for us on August 27, 1992.

During that briefing your staff and the contractors hired by GAO spent a substantial portion of the briefing complementing the safety performance at GPO. They also detailed the complexity of the GPO operations and highlighted that only a relatively few violations were evident. When questioned by our Chief of Industrial Safety Section to compare GPO's compliance with OSHA regulations to other Federal and Private employers the contractors stated that GPO's compliance was far better than either on average.

We are very proud at GPO of our commitment to Health and Safety and were very pleased to hear it acknowledged by outside reviewers. It is unfortunate that the draft report has left out this part of the story.

Respectfully,

A handwritten signature in cursive script that reads "William T. Harris".

WILLIAM T. HARRIS
Director, Occupational Health
and Environmental Services

RESPONSE TO
DRAFT REPORT

OCCUPATIONAL SAFETY AND HEALTH AUDIT
UNITED STATES GENERAL ACCOUNTING OFFICE

IV. OBSERVATIONS AND FINDINGS

1) Quality Control and Technical Department

1-1) The program to address the safe use of chemicals is not being fully implemented.

According to the Chief, Chemical and Environmental Division, there is a list of chemicals maintained on site, but not an inventory of the quantities of individual chemicals.

Material Safety Data Sheets (MSDS) are available for most, but not each and every chemical product on hand. Naturally, as a chemical laboratory, a number of chemical safety references are readily available, e.g. Dangerous Properties of Industrial Materials by N. Irving Sax; Chemical Hazards Response Information System (CHRIS), a U. S. Department of Transportation publication; the recently issued HMIS CD-ROM by the U. S. Department of Labor, Occupational Safety and Health Administration (OSHA); and numerous other data sources.

While every chemical container did not contain the hazard warning required by OSHA, the employees do constantly observe proper laboratory practices. Chemical containers are labeled as to contents (e.g. .10 Normal NaOH) which has meaning for trained chemists, including the date and name of the preparer. This is in keeping with standard chemical laboratory practices.

1-2) The Quality Control and Technical Department (QC&TD) was made aware of the OSHA Laboratory Standard at the time of issuance. The program is in the developmental stage and has not been fully completed. Right-To-Know training has been provided in accordance with the Chemical Hazard Communication Standard.

1-3) The QC&TD has been approved for renovation and rehabilitation for FY 1993. The laboratory was built circa 1922 and does not safely provide for experimental and administrative areas as indicated in the justification for

Now on p. 80

Now on p. 80.

Now on p. 80

renovation. The coffee pot was purposely mounted in a wooden cabinet to provide a physical barrier to protect from possible chemical exposures. The ice machine is labeled to discourage non-laboratory personnel from withdrawing ice for personal consumption. The ice is considered safe for human consumption. Though the laboratory does not handle extremely hazardous biological or chemical products, the forthcoming chemical hygiene plan will specifically address the non-allowance of food and beverage consumption at chemical handling locations.

These items have been deleted from final audit report.

1-4, 1-5, 1-6, and 1-10) These four discrepancies were identified as non-mandatory with reference to compliance. This is taken to mean that compliance with them is strictly voluntary. The flammable solvents referenced in paragraph 1-4 will be transferred to approved flammable safety containers. The laboratory fume hoods referenced in paragraph 1-5 and 1-6 have been identified for replacement prior to this inspection visit. Purchase requests have been submitted for that purpose. The chemicals referred to in paragraph 1-10 are separated and stored as organics, inorganics, and acids. An effort to segregate them has been in place prior to the inspection visit. Alphabetical arrangement of each of the three groupings continues to be the most logical storage method, as the incompatibility aspect has already been addressed.

Now 1-4 on p. 81.

1-7) Beneath the throw carpet, at the entrance to the conference room, there is an electrical wire attached to the adjacent workstation and a pair of telephone cables routed through a rubber safety duct. The Telecommunications Group has been requested to provide two additional sections of cable to reroute them around the walls to avoid a tripping hazard. A GPO Form 821, Request for Engineering service had been submitted to secure the electrical cord to the workstation wall base. The carpet has been relocated elsewhere.

Now 1-5 on p. 81.

1-8) The test devices referred to were part of the original laboratory equipment circa 1922. The low speed DC motors powering the devices are used two to three times per year for a brief period to conduct tests. No employees have been injured using the devices to date. Guards are not available from the manufacturer. Safety training programs have been developed to prevent personal injury.

Now 1-6 on p. 81.

1-9) The paper shredder is another device that was part of the original laboratory. It is controlled by an exposed knife switch, which is controlled by an enclosed approved switch. Users are instructed to operate the knife switch prior to energizing the enclosed switch. No one has been injured using the device to date. A GPO Form 821 will be submitted to remove the knife switch.

This item has been deleted from final audit report.

1-10) See response 1-4 - previously answered.

Appendix XIII
Comments From the U.S. Government
Printing Office

Now on p. 81.

This item has been deleted from final audit report. (See photo on p. 99.)

Now 2-2 on p. 81. (See photo on p. 99.)

This item has been deleted from final audit report.

Now 2-3 on p. 82.

2) Press Division

2-1) Employees have received Chemical Hazard Communication training and efforts are made regularly to provide chemical labeling when chemicals are transferred. Press Division employees will be reminded to report those containers whose labels may have decomposed or been removed from the effects of the chemicals themselves. Missing labels will be replaced by the Substores Representative in Press Division.

2-2) There are two foot-operated cutters in the Offset Plate Section. Both are equipped with point-of-operation guards set at the correct height. Somehow, they may have been overlooked by the inspectors. In the accompanying photographs, kindly note the plastic guard highlighted by the subject's hand. Shown in the photograph is GPO #3757, to the rear is GPO #1890 which is similarly equipped.

2-3) Letterpress GPO #1835 was purchased in 1964. The attached photograph illustrates the flywheel referred to in the inspection report. The flywheel is partially guarded, and rotates clockwise reference the photograph. This means that the flywheel turns away from the press operator and does not create a nip point hazard. No employees have been injured by the flywheel, to date, while using this press. A GPO Form 821, Request for Engineering Service has been submitted to fabricate and install a guard to enclose the open section of the flywheel.

2-4) The CO₂ gas operated fire suppression system on the Group 88 offset web presses will function automatically based on heat detection or manually. The system was tested on September 23, 1992 and was found to be operating properly. The pre-discharge warning signal operated properly.

2-5) The feed end of the Group 88 offset web presses had safety cages fabricated and installed over the moving belts about one year ago. This was done to better protect employees who were using an adjacent aisle. The attached photograph depicts the guarding on one press. The inspection report is not clear as to the precise location of the belts in question. We believe that, upon further review, the belts referenced in the report are those leading to the printing units. These are located in areas that are intended to be entered by the pressworkers only during web paper installation periods when the press is operated on "inch" or "jog" speed. Ordinarily, when the press is being operated at normal speed, employees do not enter into these close quarters. No employee injuries have been reported involving the belts to date. We do not anticipate adding additional machine guarding at this time.

Now on p. 82.

3) Binding Division

3-1) We have attempted to comply with the OSHA hearing protection standard from its inception. Machine noise readings and individual dosimeter readings have been made. Employees found to be in areas above 85dBA have been added to the annual audiometric testing program. Machines found to be potentially noise hazardous have been posted per OSHA requirements. Four styles of hearing protection devices have been stocked and made available for employee use. Compliance with the use of hearing protection devices has been difficult to enforce. Recently, prior to the subject inspection, the Safety Branch has conducted weekly visits to targeted areas posted as noise hazardous. While compliance has improved in some areas, the inspections will continue until the conditioning process can be reduced to random spot checks.

Now on p. 82.

3-2) Binding Division employees were included in the OSHA Chemical Hazard Communication standard training when the law took effect. Many of the chemicals used in GPO are purchased in bulk, then transferred into smaller containers. Added emphasis will be placed on placing proper labels on them. GPO stocks two sizes of locally designed labels that comply with the OSHA requirement for identifying the hazards related to the chemical in use.

Now on p. 82.

3-3) While this area was visited during the inspection of the Binding Division, it is not a part of their operation. The area in question is a point where chemical containers are analyzed as to contents and then emptied, crushed and recycled by the Quality Control and Technical Department. Containers coming back sometimes are missing labels, and this is always a problem. The contents are chemically tested to verify what they contain. The containers are then properly labeled. This location is being addressed by GPO management, and should be moved to a more controlled location that is not open for access by the general employee population.

Now on p. 83. (See photo on p. 99.)

3-4) The Harris adhesive binder, GPO #8478 apparently had some outer covers removed prior to the inspectors' arrival, thus exposing the moving pulleys and belts. The covers were still off during the inspection, possibly due to the continuing maintenance or cleaning that was underway. The covers were reinstalled following our visit. The accompanying photograph will assist in illustrating this point.

Appendix XIII
Comments From the U.S. Government
Printing Office

Now on p. 83.

3-5) There are five paper drills in the area in question here. Two are older vintage and three are of recent purchase. We always specify machine guarding to comply with current OSHA machine guarding standards. Both the old and new drills are equipped with pressure feet (similar to those found on home sewing machines) that are positioned between the operator and the drill. Upon revisiting the area, it was observed that one would meet with great difficulty to even purposefully attempt to drill one's finger, due to the presence of the pressure feet that surround the drills themselves, and act as a machine guard.

Now on p. 83.

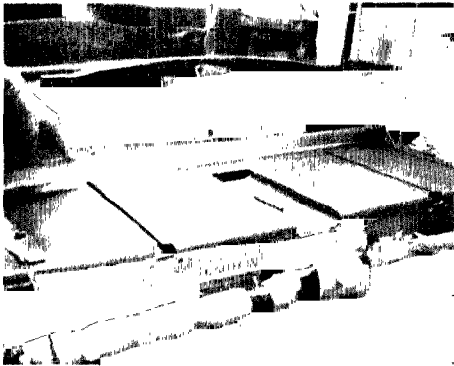
3-6) The Standard Machinery Co. cardboard stock cutter, GPO #9327 is an older piece of equipment, circa 1930. It is equipped with the original safety guards around the motor drives. The operator loads the work on the feed end, sets the cutters to the desired position, and stands away while the machine operates. The slow-moving exposed belts and drives carry the work through to the delivery end. No operator intervention is needed.

This item has been deleted from final audit report.

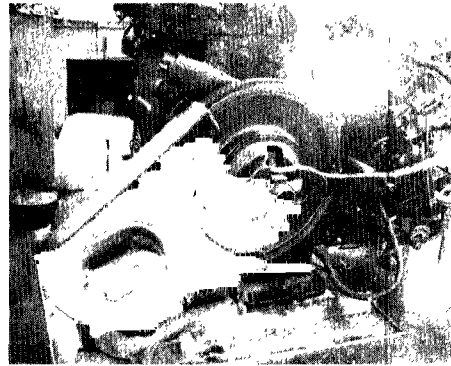
3-7) The Nygren-Dahly Co. perforator, GPO #2451 is of recent vintage. It places perforations in pages where a "tear out" coupon or related need is required. Normally large sheets of work are placed on the feed end. The operator sets the perforators to the desired position, and stands away while the machine operates. The slow-moving exposed belts and rollers carry the sheets through the perforators and to the delivery end. The sheets are then taken elsewhere to be cut down to page size. No operator intervention is needed.

With respect to the previous three items (3-5, 3-6, and 3-7), the Safety Branch has made a systematic review of the operations. It was determined that locally fabricated and installed guards may actually tend to place the operators' hands at greater risk than is now the case.

Appendix XIII
Comments From the U.S. Government
Printing Office



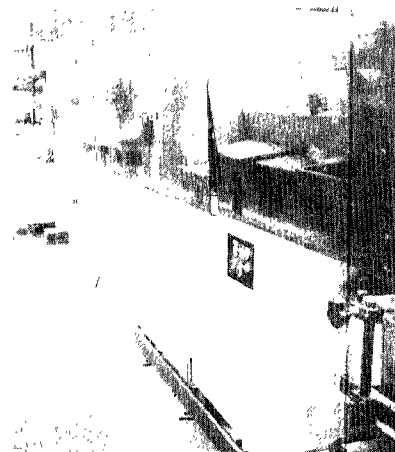
The photograph illustrates the Offset Plate Section cutter, GPO #3757. Note the safety guard highlighted by the subject's hand.



This photograph illustrates the Heidelberg letterpress, GPO #1835. Note the motor transmission/flywheel guard furnished by the manufacturer. The flywheel is partially exposed. Note the operator's arms which are in the normal point of operation.



This photograph illustrates the Hantscho offset web press, GPO #3680. Shown is the GPO fabricated and installed safety guard that protects employees walking past the moving drive belts.



This photograph illustrates the Harris adhesive binder, GPO #8478. Shown are the referenced covers seen in white with dual handles attached to facilitate removal/replacement.

Major Contributors to This Report

Human Resources
Division,
Washington, D.C.

Carlotta C. Joyner, Assistant Director
John T. Carney, Evaluator-in-Charge

Related GAO Products

Occupational Safety and Health: Improvements Needed in OSHA's Monitoring of Federal Agencies' Programs (GAO/HRD-92-97, Aug. 28, 1992).

Occupational Safety & Health: Worksite Safety and Health Programs Show Promise (GAO/HRD-92-68, May 19, 1992).

Occupational Safety and Health: Options to Improve Hazard-Abatement Procedures in the Workplace (GAO/HRD-92-105, May 12, 1992).

Occupational Safety & Health: Employers' Experiences in Complying With the Hazard Communication Standard (GAO/HRD-92-63BR, May 8, 1992).

Occupational Safety and Health: Penalties for Violations Are Well Below Maximum Allowable Penalties (GAO/HRD-92-48, Apr. 6, 1992).

Occupational Safety and Health: Worksite Safety and Health Programs Show Promise (GAO/T-HRD-92-15, Feb. 26, 1992).

Occupational Safety & Health: OSHA Action Needed to Improve Compliance With Hazard Communication Standard (GAO/HRD-92-8, Nov. 26, 1991).

Occupational Safety & Health: Worksite Programs and Committees (GAO/HRD-92-9, Nov. 5, 1991).

OSHA's Oversight of Federal Agency Safety and Health Programs (GAO/T-HRD-91-31, May 16, 1991).

Occupational Safety & Health: OSHA Policy Changes Needed to Confirm That Employers Abate Serious Hazards (GAO/HRD-91-35, May 8, 1991).

Occupational Safety & Health: Inspector's Opinions on Improving OSHA Effectiveness (GAO/HRD-91-9FS, Nov. 14, 1990).

Occupational Safety & Health; Options for Improving Safety and Health in the Workplace (GAO/HRD-90-66BR, Aug. 24, 1990).

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