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INSPECTION REPORT

NUMBER 23-08

Top 10 Safety Hazards Program Inspection

September 28, 2023

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MEMORANDUM
OIG-23-090

Date

September 28, 2023

To

Director, U.S. Government Publishing Office

From

Inspector General

Subject:

Final Report— Top 10 Safety Hazards Program Inspection, Report Number 23-08

Enclosed is the subject final report. The Office of the Inspector General (OIG) conducted an inspection of the GPO's Top 10 Safety Hazards Program. We reported two findings and made three recommendations to improve the Top 10 Safety Hazards Program. The recommendations focus on improving processes and management controls.

GPO reviewed the draft report and provided comments through the Director. In accordance with the Council of the Inspectors General on Integrity and Efficiency standards for inspections, we reviewed GPO's comments for relevance and completeness and included them in their entirety in Appendix E.

GPO concurred with all three recommendations. The proposed actions were responsive to the recommendations. We summarize management's comments and provide a detailed response throughout the body of the report. All recommendations remain open at this time.

We appreciate the courtesies extended to our staff throughout this review. If you have any questions or comments about this report, please contact Connie Greene, Assistant Inspector General for Inspections, at cgreene@gpo.gov or (202) 512-1597.

Digitally signed by Nathan Deahl
Date: 2023.09.28 15:56:10 -04'00'

NATHAN J. DEAHL
Inspector General

Attachment

Report Number 23-08

September 28, 2023

RESULTS IN BRIEF

What We Did

The OIG inspection team determined how GPO develops the Top 10 Safety Hazards list. We reviewed how GPO plans, schedules, and supports Top 10 Safety Hazards repairs. Lastly, we analyzed the status of each item on the Fiscal Year 2022 Top 10 Safety Hazards list.

What We Recommend

Our report contains three recommendations to improve the GPO's Top 10 Safety Hazards Program. The recommendations focus on documenting the requirements and process for the Top 10 Safety Hazards program; documenting guidance for prioritizing the Top 10 Safety Hazards; and completing a Master Plan for better situational awareness. GPO concurred with all three recommendations. Overall, GPO's comments were responsive to the recommendations.

What We Found

Finding 1. GPO can improve its Top 10 Safety Hazards development process with formal documentation. GPO does not have a documented process to develop its Top 10 Safety Hazards list. GPO has not required the issuance of a policy that defines the Top 10 Safety Hazards list's purpose, and how it is intended to be used throughout GPO. Without a documented approach to developing the Top 10 Safety Hazards list, GPO may not consistently identify the Top 10 Safety Hazards and may miss pinpointing an underlying root cause of the hazards. Further, without Top 10 Safety Hazards guidance, GPO may not identify the potential mission risks to GPO.

Finding 2. GPO can improve addressing the Top 10 Safety Hazards with a comprehensive approach to plan, schedule, and support current and future facility needs. GPO does not have a comprehensive approach to plan, schedule, and support all of the GPO Central Office Complex's current and future needs. We observed that the Business Units determine the priority of addressing facility requirements. With a comprehensive approach and estimated cost plan, GPO's leadership, and Congress, can have an improved picture of the scope of maintaining these buildings, including ensuring they meet or exceed building code regulations.

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INTRODUCTION

The inspection team examined the GPO's Top 10 Safety Hazards program. We assessed how the GPO develops the Top 10 Safety Hazards list; plans, schedules, and supports Top 10 Safety Hazards repairs; and analyzed the status of each item on the Fiscal Year (FY) 2022 Top 10 Safety Hazards list. Based on the results, we made three recommendations, see Appendix A; the scope and methodology are presented in Appendix B.

Background

The GPO OIG initiated this review from its FY 2022 annual work plan. GPO twice requested we inspect this program in response to our annual project solicitation. In both instances, the Director requested that we assess if the Top 10 Safety Hazards were addressed with the appropriate priority, and if GPO had appropriate manpower to keep the Central Office Complex buildings safe for employees. Based on the original requests and additional information received from the GPO, we modified the objectives of the inspection.[1] Answers to the current objectives should assist the Director with a better understanding of how prioritization for the Top 10 Safety Hazards could be improved.

Top 10 Safety Hazard List

Every year, Security Services' Safety Branch conducts Physical Security and Safety Assessments (PSSA) on all GPO facilities. The results of the assessments are published in PSSA reports. Work orders are then submitted for facility-related issues to Agency Support Operations' Engineering Services/Facility Division. When the last assessment of the year is complete, an updated list of the Top 10 Safety Hazards is published and the list is briefed to the Executive Committee. This process is further described in Finding 1.

The purpose of the Top 10 Safety Hazards list is to highlight the 10 priority hazards for the next year. Many of the priority hazards have lingered on the Top 10 Safety Hazard list for years. The FY 2022 Top 10 Safety Hazards are listed in Table 1. The length of time they have been on the Top 10 Safety Hazards list is shown in Figure 1. More than half of the current Top 10 Safety Hazards have been ongoing for many years. Additional summaries, including descriptions, details, and statuses, of the various Top 10 Safety Hazards are included in Appendix D.

[1] The additional information was a result of an OIG data call and included the Top 10 Safety Hazards lists and updates on the status of the Top 10 Safety Hazards.

Table 1. FY 2022 Top 10 Safety Hazards

Name	Description
1. Basement Ceilings	Concrete chunks fell and were removed, but the structure is now thin. The cracks eventually allowed water infiltration.
2. Electrical Panels and Equipment	Noncompliance code issues, panels lack a cover over exposed wiring, poor panel location documentation, panels missing schedule of what the panel controls, electrical risers need to be replaced, GPO cannot add new connections to current panels.
3. H Street Loading Dock	GPO's most active loading dock has moderate to severe deterioration of the concrete driveway, ramps, drainage system, dock guards, bumpers, stairs, canopy, traffic signs/ controls, dock plate, ceiling, dock levelers, lights, doors, and air conditioning.
4. Ductwork Cleaning	Some of the dust in the Ductwork has been determined to be explosible. Ducts have not been cleaned. It costs less for GPO to replace its ductwork versus cleaning it.
5. Roof Fall Protection	Employees accessing roof cooling tower gauges and valves need to walk on pipes feeding the tower. This damages pipe insulation and exposes employees to a potential fall and injury.
6. Fire Safety	GPO stairwell fire doors have been modified and repaired over the years, impacting their capability to withstand a fire for the required time. The Fire Suppression System assessment identified numerous other issues.
7. Dust Collection System	Paper dust in GPO's five Dust Collection Systems presents a fire and explosive hazard to GPO's buildings and staff. Paper dust could ignite and cause an explosion and a fire. Fire could migrate to other parts of GPO through the ductwork.
8. Fire Extinguisher Hydrostatic Testing[2]	GPO's fire extinguishers are required to be inspected monthly, but those inspections are not happening. Additionally, the fire extinguishers are 12 years old and require hydrostatic testing.[3]
9. Motor Vehicle Licensing	Motor Vehicle Operators (MVO) are not GPO-licensed. MVO operators need physicals. Medical Services has a backlog of needed MVO medical physicals. MVO operators have failed physicals.
10. Appliance Permits	Appliance permits in offices with minimal to no manning have expired, and have been expired for more than 3 years. GPO has a process to permit appliances, but no clear process of re-permitting appliances, or regularly re-inspecting appliances to avoid permit expiration, nor what to do with the appliance when a responsible employee departs GPO.

[2] Fire Extinguisher Hydrostatic Testing was previously Fire Extinguisher Inspection.
[3] This hazard was considered closed in the FY 2023 Top 10 Safety Hazards list.

Figure 1. Years since FY 2022 Top 10 Safety Hazards were first identified

Top 10 Safety Hazard	2014	2015	2016	2017	2018	2019	2020	2021	2022
Basement Ceilings	2014-2022								
Electrical Panels and Equipment		2015-2022							
H Street Loading Dock					2018-2022				
Ductwork Cleaning		2015-2022							
Roof Fall Protection				2017-2022					
Fire Doors							2020-2022		
Dust Collection System				2017-2022					
Fire Extinguisher Hydrostatic Testing[4]								2021-2022	
Motor Vehicle Licensing									2022
Appliance Permits									2022

Source: OIG Analysis

The Issue

As shown above, the majority of the Top 10 Safety Hazards remained on the Top 10 Safety Hazards list for years. Reviewing the Top 10 Safety Hazards program could help identify why hazards are lingering and the potential resources needed to address the hazards. Addressing known hazards is a tangible way to show that safety is important, and to prevent or minimize injury or damage to GPO employees, buildings, and equipment.

Objectives

Our overall objective was to review the Top 10 Safety Hazards program. Sub-objectives included:

1. Determine how GPO develops the Top 10 Safety Hazards list.
2. Determine how GPO plans, schedules, and supports the Top 10 Safety Hazards repairs.
3. Analyze the status of each item on the FY 2022 Top 10 Safety Hazards list.

[4] Fire Extinguisher Hydrostatic Testing was previously Fire Extinguisher Inspection.

Prior Evaluation Coverage

There was no OIG work found in this area. However, we identified prior internal reviews related to the objectives of this inspection, specifically:

- GPO Top 10 Safety Hazards lists, FYs 2017 - 2022
- GPO FY19 Annual Performance Plan and FY17 Annual Performance Report, undated[5]
- GPO Priority Project Narratives, March 2020
- GPO Priority Program and Projects Narratives, April 2021

Criteria

- GPO Directive 670.10C, *Safety Program*, June 5, 2019
- GPO Directive 670.12A, *Job Safety Analysis*, June 5, 2019
- GPO Directive 670.67B, *Fire Protection and Prevention Program*, June 5, 2019
- GPO Directive 805.1G, *Required Approvals of GPO Procurements and Other Actions by the Joint Committee on Printing*, August 26, 2021
- GPO Directive 810.10H, *Facilities Management Procedures for Requesting Service*, December 3, 2020

[5] https://www.gpo.gov/docs/default-source/mission-vision-and-goals-pdfs/gpo-fy19-fy17-performance-report.pdf

INSPECTION RESULTS

Finding 1. GPO can improve its Top 10 Safety Hazards development process with formal documentation.

GPO does not have a documented process to develop its Top 10 Safety Hazards list. GPO has not required the issuance of a policy that defines the Top 10 Safety Hazards list's purpose, and how it is intended to be used throughout GPO. Without a documented approach to developing the Top 10 Safety Hazards list, GPO may not consistently identify the Top 10 Safety Hazards and may miss pinpointing an underlying root cause of the hazards. Further, without Top 10 Safety Hazards guidance, GPO may not identify the potential mission risks to GPO.

Criteria

- GPO Directive 670.10C, *Safety Program*, June 5, 2019
- GPO Directive 670.12A, *Job Safety Analysis*, June 5, 2019

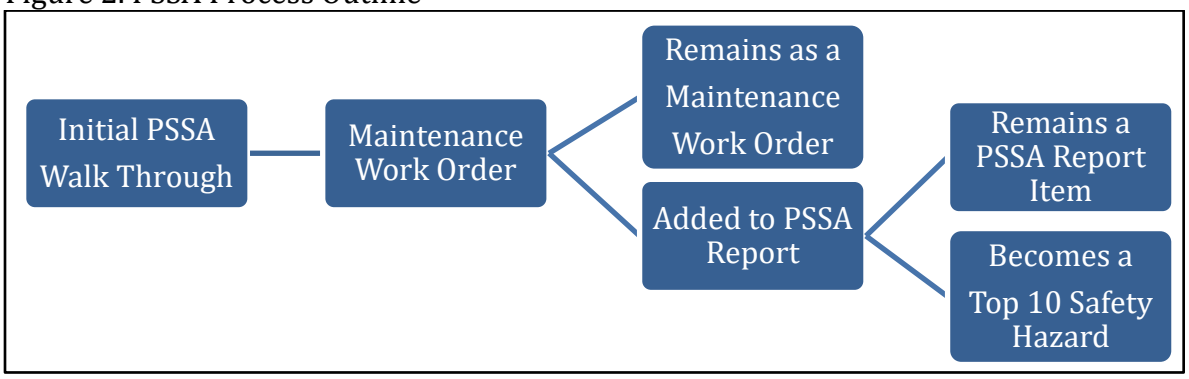
The Top 10 Safety Hazards List Process

GPO's Safety and Health Manager determines what items are included on the Top 10 Safety Hazards list, a responsibility included in their annual performance plan. The Top 10 Safety Hazards list includes hazards that pose the highest risk of injury or damage to GPO employees, buildings, and equipment; it also includes hazards that may need additional attention to address. Additional attention could include more funding, or working with other Business Units to address the hazard.

Physical Security and Safety Assessments (PSSA) Process

The creation of the Top 10 Safety Hazards list is informed by the annual PSSAs conducted by Security Services. The process is outlined in Figure 2. During the PSSAs, Security Services personnel walk through and observe the security and safety of the various GPO buildings and identify issues that need to be fixed. Examples of these issues are the security of closing doors, the safety of addressing missing ceiling tiles, exposed electrical wires, water leaks, or soot coming from air vents. The PSSA process culminates with a written report.

Figure 2. PSSA Process Outline



Source: OIG Analysis

During the PSSA walk throughs, Security Services personnel input information into an Excel file. Maintenance work orders are created for the Facility Division to address, if needed. If the maintenance work orders are completed within approximately a week, the Safety and Health Manager updates the Excel file. The Safety and Health Manager inputs unaddressed issues into the PSSA report. All issues included in the PSSA report are added to an Access database for tracking. The Safety and Health Manager then updates the Access database, to state when issues were addressed.

When creating the Excel spreadsheet of the issues, the Safety and Health Manager applies a risk level to every issue: Extremely High, High, Medium, and Low. These risk levels are based on the issue's probable persistence and the severity. Issues that could be fixed in a few days through the normal maintenance work order system or that do not need senior management involvement would not be included on the Top 10 Safety Hazards list. The risk levels are defined in GPO Directive 670.12A, *Job Safety Analysis*, June 5, 2019, and shown in Figure 3. While the purpose of Directive 670.12A is to "provide supervisors and employees a tool to analyze their workspace hazards, mitigation plans, and manage/accept risks," the Safety and Health Manager later clarified that the directive is for identifying on-the-job hazards and mitigating the associated hazards, not for tracking Top 10 Safety Hazards.

Figure 3. Risk Assessment Matrix

RISK ASSESSMENT MATRIX				PROBABILITY				
				Frequency of Occurrence Over Time				
				A Frequent (Continuously experienced)	B Likely (Will occur frequently)	C Occasional (Will occur several times)	D Seldom (Unlikely; can be expected to occur)	E Unlikely (Improbable; but possible to occur)
SEVERITY	EFFECT OF HAZARD	Catastrophic (Death, Loss of Asset)	I	EH	EH	H	H	M
		Critical (Severe Injury or Damage)	II	EH	H	H	M	L
		Moderate (Minor Injury or Damage)	III	H	M	M	L	L
		Negligible (Minimal Injury or Damage)	IV	M	L	L	L	L
				Risk Assessment Levels				
				EH=Extremely High H=High M=Medium L=Low				

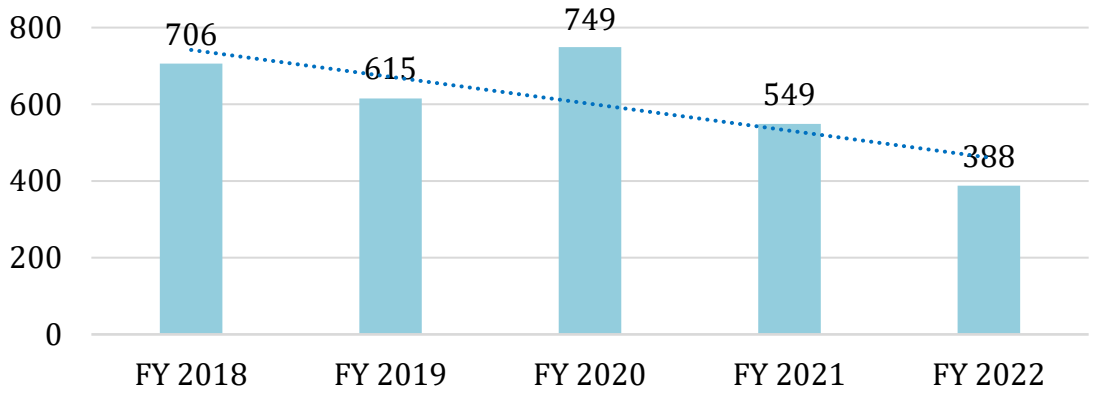
Source: GPO Directive 670.12A, *Job Safety Analysis*, June 5, 2019

PSSA Reports and Trends

In FY 2018, the PSSA reports ranged in length from 17 pages to 42 pages. In FY 2022, the PSSA reports ranged from 11 pages to 12 pages. The change in the length of the PSSA reports was due to changes in the process identified above, where the Safety and Health Manager waits about a week for the Facility Division to complete the maintenance work orders that address the issues before adding the issues to the PSSA reports. The Facility Division also started sending staff to accompany Security Services during walk throughs so they could see exactly what was identified as an issue to more easily resolve and fix the issue.

Although there was a spike in items to address in FY 2020, the number of items identified in GPO's Central Office Complex buildings dropped from FY 2018 to FY 2022. This is shown in Figure 4.

Figure 4. Items identified in PSSAs, FY 2018 – FY 2022



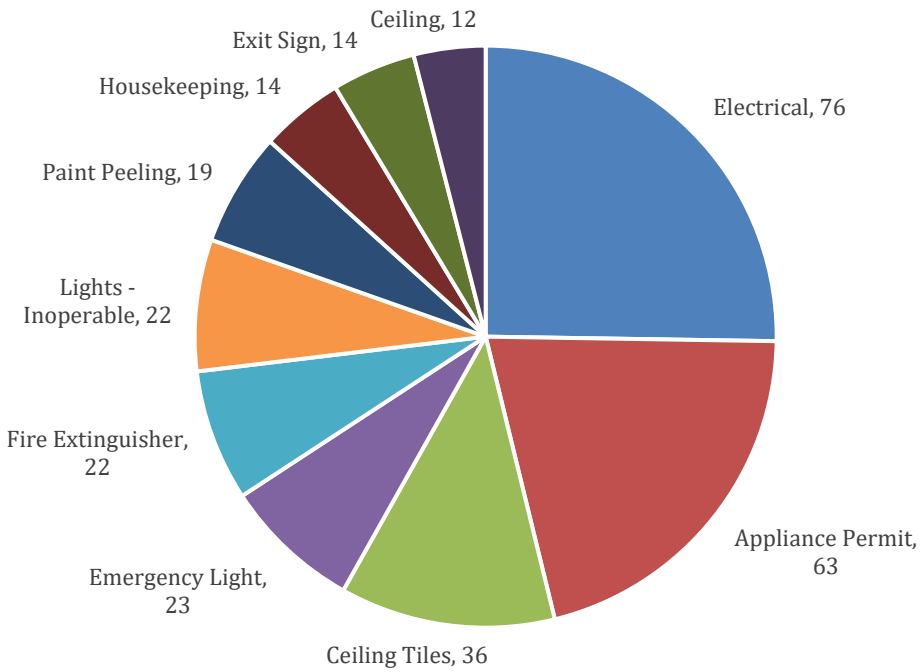
Source: OIG Analysis

The PSSA reports are largely MS Word documents with pictures. In our opinion, the current PSSA reports are cumbersome to read and the highest risks could be overlooked. In addition, the issues identified are grouped together, instead of a separate entry for each issue. For example, missing ceiling tiles are grouped into one section, with the location of each missing tile listed. There might be six missing ceiling tiles, but instead of six items on the PSSA report, only one item is listed. Additionally, the listed entries will indicate if the item is a repeat issue.

Improving PSSA Reports

PSSA reports could be improved by including graphics, such as pie charts of the types and numbers of issues, or the comparison of repeat issues from previous years. For example, in all of FY 2022, there were 388 issues, categorized into 44 categories. The 10 most common categories are shown in Figure 5. Electrical was the largest category, followed by Appliance Permit, and Ceiling Tiles. Including a chart like the one below in the PSSA reports could make it easier for GPO leadership to identify the category of issues more quickly.

Figure 5. FY 2022 10 most common categories of PSSA items



Source: OIG Analysis

From PSSA to Top 10 Safety Hazards List

After completing the PSSA reports, the Safety and Health Manager creates the Top 10 Safety Hazards lists as PowerPoint presentations, with one slide per hazard. The slides include pictures and descriptions including when the hazard was identified, why it is a hazard, and the expected next steps. The Safety and Health Manager includes hazards that pose the highest risk for injury or damage and hazards that need additional attention or outside contract support to assist the Facility Division. However, absent a written procedure or template, we noted a year-to-year variation that may lead to unintended consequences as discussed below. In addition, should the Safety and Health Manager leave the GPO, their beneficial experience will be lost without proper knowledge capture via procedures.

GPO's Process to Develop the Top 10 Safety Hazards List Lacks Documentation

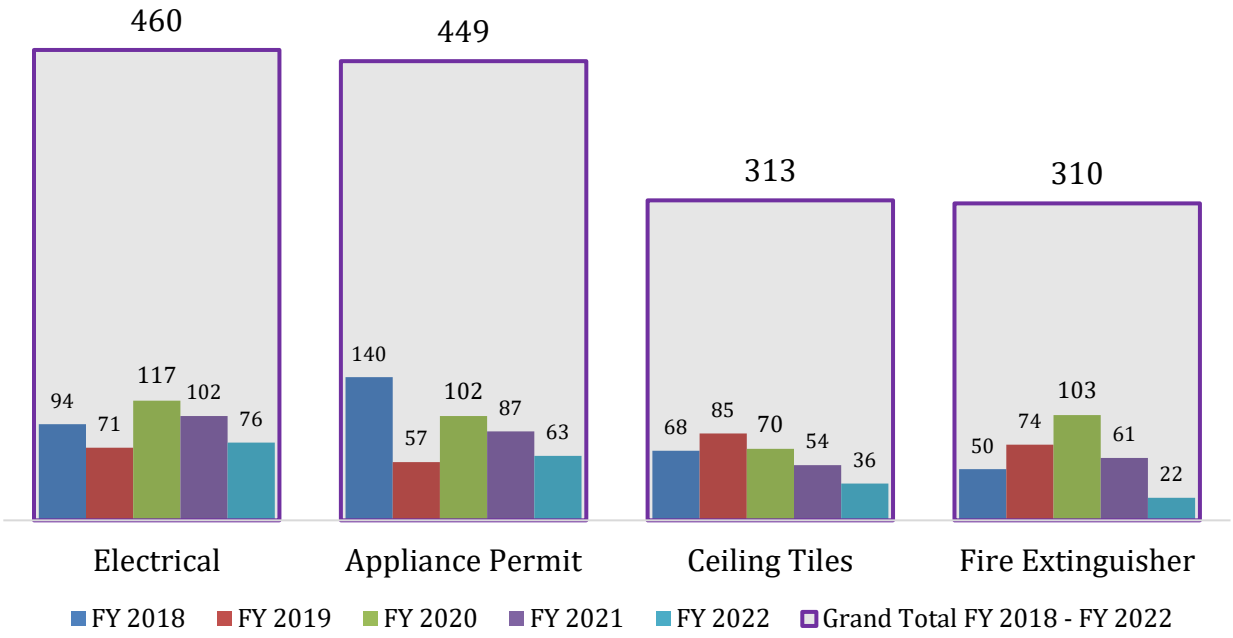
While the first Top 10 Safety Hazards list was published in 2015, there was no documented procedure to ensure the list was created in a standardized and repeatable manner. Instead, the Safety and Health Manager creates new records based on updating the records from previous years, with variations in what information is recorded, and how that information is recorded. Without written, documented procedures, repeat issues could be categorized as different things, diluting the issue, and diluting its potential repetitiveness. For example, something described as Electrical Panel could

mean Exposed Wires, or it could mean a Missing Cover. Something described as Appliance Permit could mean the appliance permit is expired, or it is missing.

How Documentation Can Help

We reviewed the provided PSSA reports and Excel files and identified 472 discrepancy categories.[6] Conducting our own analysis, categorizing like-with-like, we were able to decrease the categories by more than two-thirds to 150. This shows the subjective nature of the reports. Defining and documenting categories could help GPO identify which ones to focus on. Using our updated categories, we identified 460 Electrical issues, 449 Appliance Permit issues, 313 Ceiling Tile issues, and 310 Fire Extinguisher issues. Their prevalence over the FYs varied, as in Figure 6. These categories could be further refined, to provide a clearer picture for GPO leadership.

Figure 6. Most prevalent categories between FY 2018-FY 2022, #1 - #4

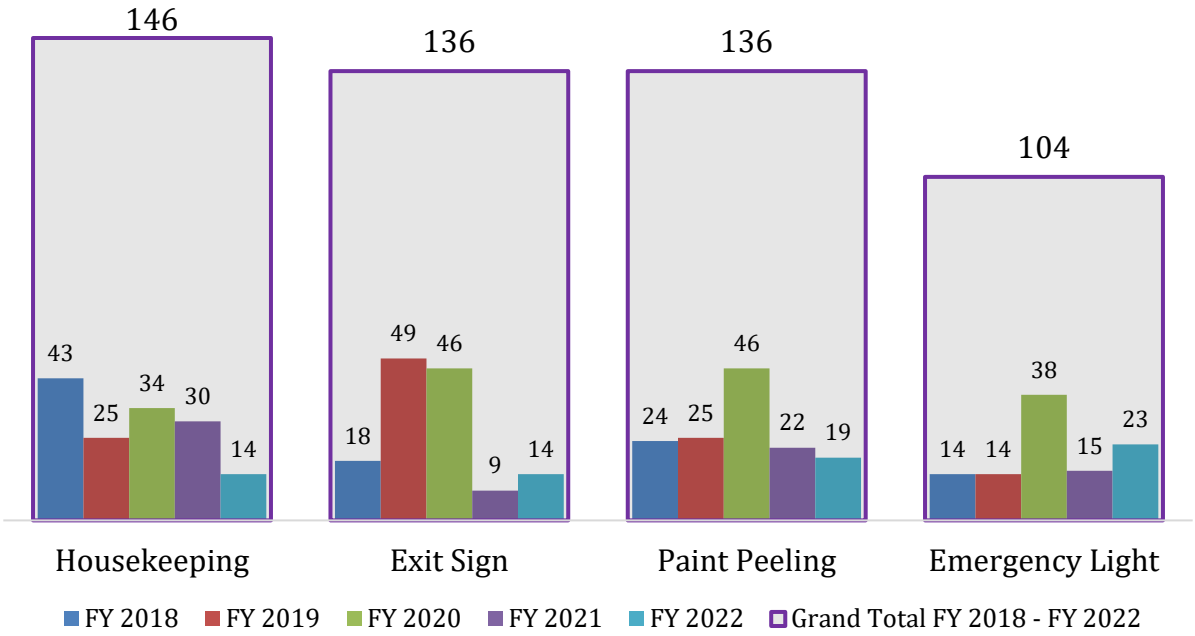


Source: OIG Analysis

The next four most prevalent categories were Housekeeping, Exit Sign, Paint Peeling, and Emergency Light, as shown in Figure 7. These four items are significant because, over five years, there were over 100 incidents in each of these categories. The Exit Sign and Emergency Light categories do point to employee safety, particularly in a situation where smoke from a fire might block seeing the emergency exits.

[6] A discrepancy is the short description of the safety concern.

Figure 7. Most prevalent categories between FY 2018-FY 2022, #5 - #8



Source: OIG Analysis

In another example where improved documentation could help, we were unable to identify an objective process by which the highest risk hazards are identified; thus, GPO may not consistently identify the Top 10 Safety Hazards. Variations in what information is recorded in the PSSA reports could result in larger scale hazards being missed, or a focus on issues the Safety and Health Manager saw most recently, versus issues identified three to four months ago.

Finally, the Top 10 Safety Hazards list is not included as part of the Safety Program in GPO Directive 670.10C, *Safety Program*, June 5, 2019. While the directive includes procedures to report incidents, accidents, near-misses, and unsafe or unhealthful conditions in the workplace, it does not include the Top 10 Safety Hazards list as a way to keep GPO management apprised of GPO's safety needs and priorities.

Include Risk Details to Improve Top 10 Safety Hazards Reporting

While the Top 10 Safety Hazards list PowerPoint presentations information is useful for GPO management's awareness, the lists do not identify the risks to getting the hazards addressed, such as lack of staff or needed support from Business Units. For example, the July 2020 Top 10 Safety Hazards list included a statement that a "Phase 1 construction contract [was submitted] to Acquisitions in the Summer of 2019," but does not identify why, approximately a year later, the project was still waiting for Acquisitions. Similarly, the July 2021 Top 10 Safety Hazards list included a statement that the same contract was "estimated to be awarded in the 2nd [quarter] FY22,"[7] still without identifying why the

[7] The 2nd quarter of FY 2022 covered January to March 2022.

contract had not yet been awarded. The PowerPoint presentations do not have enough details for someone with limited knowledge to recognize the various risks associated with the hazards. Suggested examples of potential improvement are in Appendix D.

Further, while the earlier Top 10 Safety Hazards lists included some description of the safety risks, the more recent lists do not consistently include them. Additionally, they do not include potential **mission** risks to GPO, which we believe would be helpful for GPO leadership to understand. For example, failing to repair GPO's main loading dock could result in it being too dangerous to use. This could mean that GPO would have to adjust how it receives and sends shipments, potentially delaying delivery of printed documents, and introducing potential new hazards due to the changes in shipping processes.

In summary, GPO has a multi-step approach to creating its Top 10 Safety Hazards list but lacks documentation of that process. Without a policy outlining the detail that should be included about the Top 10 Safety Hazards, and the risks associated with those hazards, GPO may not place sufficient priority on addressing the Hazards. By more clearly identifying the various timeframes, reasons for delays, and risks to GPO, leadership will be better equipped to make decisions. Additionally, documenting the procedures can prevent eventual knowledge loss from personnel turnover.

Recommendation

Recommendation 1. Document the requirement for a Top 10 Safety Hazards list, in a directive or other guidance document. Include the following:

a. the list's purpose and intended use throughout GPO;
b. assigned responsibilities;
c. details to be included in the Top 10 Safety Hazards List, like a description of the issue, the planned solution, a timeline history, safety risks to GPO personnel, and mission risk to GPO;
d. the process for how hazards are identified, categorized, reported, updated, and closed.

Management Comments

GPO concurred with this recommendation. The agency developed a draft directive to address this recommendation and expects the directive to be completed by December 31, 2023.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Finding 2. GPO can improve addressing the Top 10 Safety Hazards with a comprehensive approach to plan, schedule, and support current and future facility needs.

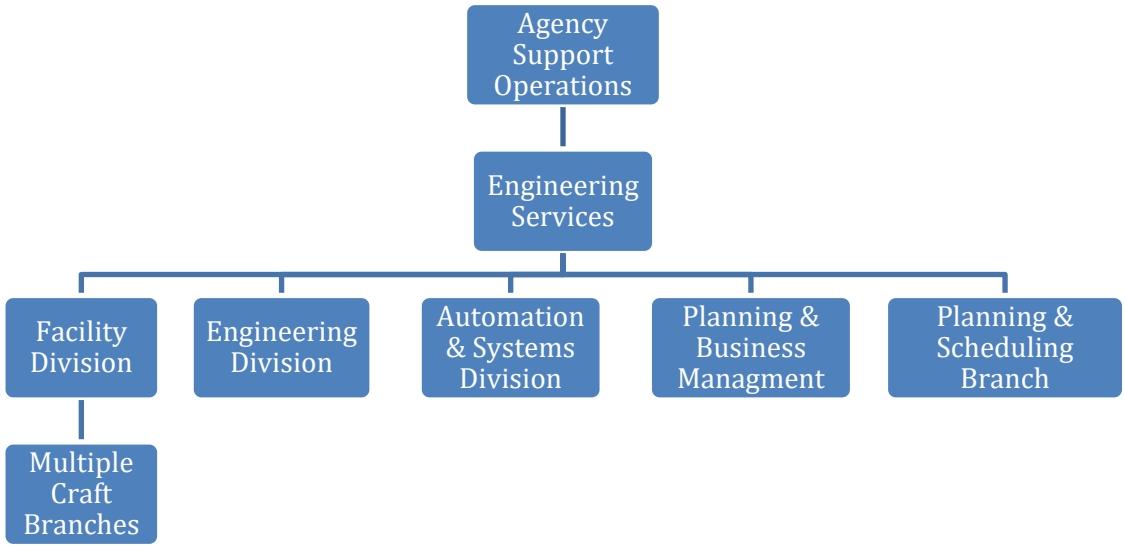
GPO does not have a comprehensive approach to plan, schedule, and support all of the GPO Central Office Complex's current and future needs. We observed that the Business Units determine the priority of addressing facility requirements. With a comprehensive approach and estimated cost plan, GPO's leadership, and Congress, can have an improved picture of the scope of maintaining these buildings, including ensuring they meet or exceed building code regulations.

Criteria:

- GPO Directive 670.67B, *Fire Protection and Prevention Program*, June 5, 2019
- GPO Directive 805.1G, *Required Approvals of GPO Procurements and Other Actions by the Joint Committee on Printing*, August 26, 2021
- GPO Directive 810.10H, *Facilities Management Procedures for Requesting Service*, December 3, 2020

The main GPO Business Units that address the Top 10 Safety Hazards repairs are Security Services/Safety Branch; Agency Support Operations/Engineering Services; and Acquisition Services. An organizational chart for Agency Support Operations/Engineering Services is in Figure 8. The Safety Branch determines which items are on the Top 10 Safety Hazards list, and in which order. Engineering Services addresses the hazards, by completing the necessary work or identifying that they need outside support to address the hazard. For example, while the Engineering Services/Facility Division's "craft" branches can do certain carpentry and electrical work, they may require outside support depending on the size of the job or the level of expertise needed. Engineering Services also plans and schedules the work needed to address the hazards, both internally and externally. Acquisition Services provides contracting support to address the hazards if necessary.

Figure 8. Agency Support Operation/Engineering organizational chart



Source: GPO

GPO Lacks a Documented Process to Plan, Schedule, and Support the Top 10 Safety Hazards Repairs

One of the three Engineering Services leaders that we interviewed had some written guidance to address their work but we were told that there is no written process to address Top 10 Safety Hazards. Instead, we learned that upon notification of a hazardous condition or vulnerability, the Facility Division validates the issue. Along with Engineering Services, they analyze the underlying cause of the hazardous condition. Once the underlying cause is analyzed, the Facility Division seeks Joint Committee on Printing (JCP) approval for funding to correct or eliminate the hazardous condition. After funding is identified, the Facility Division schedules the projects to address the hazards, using GPO staff or external contractors. Although not documented, the process to address the Top 10 Safety Hazards is no different than how the Facility Division addresses any facility issue: conduct analysis; if major, bring in contractor firms; identify the cost to inform decisions; and request the funding. Acquisition Services, which provides support in contracting to address the Top 10 Safety Hazards, has guidance for general contracting activities. However, Acquisition Services does not have guidance specific to addressing the Top 10 Safety Hazards and relies on the Business Units to identify the priority of the contracting request.

Creating a Long-Term Master Plan to Identify Future Facility Needs

While GPO has a "Facilities Management Master Plan", dated June 2022, that document is focused on projects already in progress, even including some of the projects to address

the hazards.[8] The "Facilities Management Master Plan" looks at GPO's planned projects through FY 2027. This is a positive start for project planning, but we assess that it does not go far enough to identify the buildings' needs over the long term; that is, for the next 10 to 20 years, and beyond.

Engineering industry examples of a comprehensive Master Plan include items such as:

- Identifying budget renewals of existing building needs, also known as a deferred maintenance plan or a capital renewal plan.
- Identifying capacities and demands for expanded facilities.
- Identifying possible solutions to both existing and expanded needs.
- Creating strategic energy plans for managing energy costs into the next decade or two.
- Outlining operational plans for the maintenance and operations of building systems into the future.[9]

A Master Planning effort, as described above, would identify critical assets of GPO's Central Office Complex buildings, including determining the cost of asset maintenance or replacement. The Master Planning identification results would also inform GPO about code compliance issues. GPO could use this knowledge to ensure its buildings are compliant with current codes. A Master Plan could also identify maintenance and replacement sequencing, informing GPO's stakeholders of future capital planning needs.

A comprehensive Master Plan could guide long-term maintenance and upgrades. Master Plans could include engineering reviews of plumbing, electrical, structural, architectural, and automated controls. A Master Plan could also identify the strategic planning, scope, and capital investment GPO would need over the next 10 to 20 years and beyond, to keep and bring its buildings into modern standings. The funds necessary to realize the intended building renovation changes could be spread across multi-year efforts. All associated costs, including planning temporary office moves and utility needs, could be integrated into a Master Plan. A Master Plan could be updated annually or less frequently, based on what is, and is planned to be, completed.

Overall, developing a Master Plan should allow GPO to better plan, schedule, and support the Top 10 Safety Hazards, by addressing the buildings' needs before the various equipment reaches the end of its lifespan or degrades to a dangerous level.

[8] The Facility Division is not responsible for addressing certain hazards, including Motor Vehicle Licensing and Appliance Permits.

[9] Examples are based on reviews of multiple architect and engineering firm websites and discussions with subject matter experts.

There is no Requirement for GPO to have a Master Plan that Identifies All of the Buildings' Needs

GPO is required to get the JCP's approval for purchases or contracts for services that exceed $250,000. Additionally, GPO must obtain JCP approval prior to alterations to, or relocation of, facilities. Further, if GPO expects to spend more than $250,000 in a year to make a repair or to make a replacement, the JCP must approve it.[10] However, there is no requirement for a Master Plan giving the JCP a full picture of what the GPO buildings need over the next 10 to 20 years or more. As recently as May 2023, the JCP did not initially approve a request for supplemental construction management services to address previously approved projects.[11] These supplemental services were in addition to the initial costs of the approved projects. We assess that a Master Plan could have included the possibility for supplemental services. With this information, GPO could have included the cost of the supplemental services in the original request to the JCP.

Scheduling Top 10 Safety Hazards Repairs Could Benefit from Top-Down Prioritization

GPO's Facility Division addresses requests from the Business Units as they come in; we did not observe a GPO-wide approach to address the various requests and how they tie into GPO's overall needs. For example, when GPO was purchasing new inkjet presses, the Facility Division was told by Production, a division within Plant Operations, to stop working on other projects and work on the inkjet presses as a priority.[12] While the Facility Division tries to address the various Business Units' requests in a way that can address a Business Unit's priorities and other building needs, changing priorities may result in delays in addressing the Top 10 Safety Hazards. According to GPO Directive 810.10H, *Facilities Management Procedures for Requesting Service*, December 3, 2020, planned major work orders are defined as major repairs or renovations to modernize equipment, update infrastructure, or support business operations. These planned major work orders are to be approved by the head of the requesting Business Unit and the Deputy Director, and upon approval, are to be prioritized and scheduled by the Chief of Engineering Services and by GPO Senior Management. While the Facility Division tries to address the various Top 10 Safety Hazards through the Business Units' many needs, such as updating a space and installing a new Heating, Ventilation, and Air Conditioning (HVAC) system, this approach appears left largely to the Facility Division to orchestrate. The Top 10 Safety Hazards process lacks a codified senior leadership prioritization process to address the hazards.

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[10] GPO Directive 805.1G, *Required Approvals of GPO Procurements and Other Actions by the Joint Committee on Printing*, August 26, 2021.

[11] JCP response to GPO's May 3, 2023, traditional mid-year supplement to its annual spend plan for FY 2023, May 24, 2023.

[12] GPO's Plant Operations is a major GPO business unit that delivers innovative print and digital solutions to federal customers.

In another example, FY 2022 Top 10 Safety Hazard item 8 started as "Fire Extinguisher Testing." However, the responsible divisions, Safety Branch and Facility Division, have not identified how they would ensure that the fire extinguishers were inspected monthly.[13] This is because there was not an expressed agency priority to identifying and implementing a resolution. The issue is further described in the text box.[14]

Similarly, the contracting support provided by Acquisition Services depends on priorities identified by the various Business Units requesting contracting support. While some reasons for priority support are self-evident, such as appropriations funds that will expire at the end of the fiscal year, or if a contract ending could result in a gap in service, other reasons for priority support depend on information from the Business Unit. Understanding the "why" from the Business Units can help inform the support needed from Acquisition Services.

Together, this points to no overall approach to identifying common priorities across GPO, but instead, Business Units determining their own priorities, which may compete with the priorities of other Business Units.

GPO has approximately 700 fire extinguishers, which are to be checked monthly by the Facility Division's Pipe Shop. As early as February 2020, the Safety Branch submitted a plan to relocate some fire extinguishers and decrease them to approximately 550, while still ensuring required appropriate coverage. The Facility Division proposed a change in the responsibility for inspecting the fire extinguishers, due, in part, to some of the fire extinguishers being inside locked spaces. In February 2020, the Facility Division suggested that Business Units be responsible for inspecting the fire extinguishers in their spaces. Neither the relocation nor the change in responsibility have moved forward.

Delays in Addressing the Top 10 Safety Hazards

As the Business Unit responsible for addressing the majority of the Top 10 Safety Hazards, the Facility Division relies either on the Engineering Division to accomplish the work or on Acquisition Services to contract the work. However, updates to the Top 10 Safety Hazards list show that the Facility Division often had to wait for contracts to be processed. As early as 2020, some delays were due to a lack of personnel resources in the Engineering Division to prepare a statement of work and manage the construction process.[15] In May 2023, GPO requested approval from the JCP to contract supplemental construction management services. The request was not initially approved due to a lack of details regarding the services. While multiple projects were referenced, none of the projects were associated with, or identified as, any of the Top 10 Safety Hazards.

In another case, the Top 10 Safety Hazards update stated that information for a contract was submitted to Acquisition Services, but nearly two years later, that contract had not yet been awarded. While the contract has recently been awarded, this lengthy timeframe

[13] GPO Directive 670.67B, *Fire Protection and Prevention Program*, June 5, 2019.
[14] This hazard was closed in the FY 2023 Top 10 Safety Hazards list, but the issue does not appear to have been resolved.
[15] Information was provided in advance of a Top 10 Safety Hazards list update, but was not included in the Top 10 Safety Hazards list.

to process contracts appeared to be due to a distinction in the terminology of items needed by Acquisition Services to process acquisition requests. According to Acquisition Services intranet pages, as of May 2023, an initial Purchase Request appears to show that the funds are available for a project. A Purchase Request package, however, includes multiple documents, such as the initial approved Purchase Request, a Statement of Work, an Independent Government Cost Estimate, and Market Research, as applicable. The documents are next reviewed by a Contract Specialist. If the documents are complete, the package moves into the solicitation and award phases. This distinction, the difference between an initial Purchase Request approval and the Purchase Request package, is not stated in the Top 10 Safety Hazards list updates. Although the initial Purchase Request was submitted, Acquisition Services needed additional information from the Facility Division to complete the Purchase Request package and move into the solicitation and award phases. This disconnect in various Acquisition Services terminology could lead to misunderstandings of where GPO is in the process of addressing the hazards. This is shown in the various summaries in Appendix D.

Additionally, as described previously, some of the delays were due to competing priorities. These changing priorities resulted in a lack of Engineering staff available to prepare statements of work and to manage construction projects.

GPO Continues to Request Funding for the Same Projects

Between FYs 2018-2022, GPO requested nearly $20 million to address the Top 10 Safety Hazards, as shown in Figure 9. These projects are still ongoing. The requests for additional funding mean that the JCP does not always have the full estimate of the price to address projects, and is subject to needing to approve more funding in future years to complete a project. For example, for FY 2018, GPO requested $500,000 as necessary to replace damaged concrete and to repair the loading dock in Building C. For FY 2019, the GPO requested an additional $2,500,000 to renovate and modernize the loading docks.[16]

[16] Figure 9 shows that GPO requested a total of $2,500,000 in FY 2019 for Loading Docks. This includes the $1,500,000 for the Building C loading dock and $1,000,000 to complete construction on Building D's loading dock, which previously invested $500,000 to renovate and modernize that loading dock.

Figure 9. FYs 2018 – 2022 Spend Plan Requests to the JCP

Hazard	FY 2018	FY 2019	FY 2021	Total
Basement, Sub-Basement, and Garage Structure	$0	$1,000,000	$3,700,000	$4,700,000
Cooling Tower Piping/Roof Fall Protection	$7,000,000	$0	$0	$7,000,000
Ductwork Cleaning	$0	$2,250,000	$70,000	$2,320,000
Dust Collection System	$1,000,000	$0	$0	$1,000,000
Electrical Panels and Equipment	$600,000	$100,000	$0	$700,000
Fire Extinguisher Inspections	$0	$0	$100,000	$100,000
H Street Loading Dock	$500,000	$2,500,000	$0	$3,000,000
Lightning Protection System	$1,000,000	$0	$0	$1,000,000
Total	$10,100,000	$5,850,000	$3,870,000	$19,820,000

* Note: GPO did not request funding for the Top 10 Safety Hazards repairs in FY 2020 and FY 2022.

In conclusion, without a comprehensive picture of what the buildings need, GPO risks repeating similar repair or renovation work. This could be because Business Units are making their decisions on their own priorities, versus GPO coordinating its various priorities. Additionally, Acquisition Services' priorities are based on the priorities identified by the Business Units. A comprehensive Master Plan could help GPO determine its priorities, folding in the Business Unit needs. Further, a Master Plan could potentially identify other safety hazards that should be given a higher priority, rather than some of the hazards that are currently on the Top 10 Safety Hazards list.

Recommendations

Recommendation 2. Develop documented guidance to prioritize and address the Top 10 Safety Hazards. This could be a short checklist, or it could be a more extensive standard operating procedure.

Management Comments

GPO concurred with this recommendation. The agency used a digital prioritization process to rank all FY 2024 projects for Congressional consideration and funding approval. After funding is approved, the agency will use the same digital prioritization process to prioritize the newly funded projects and those projects funded in previous years. The agency will share written documentation of this process with the OIG to support closure of the recommendation, and expects to do so by December 31, 2023.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Recommendation 3. Complete a Master Plan to address all of the buildings' needs for the next 10-20 years or more, beyond the current project-specific "Facilities Management Master Plan," and use the Master Plan to prioritize projects.

Management Comments

GPO concurred with this recommendation. The agency developed and is implementing an operational concept for an Agency-level Master Plan to capture requirements for the next 10-20 years. The agency requested funding for a Facility Condition Assessment for FY 2024 to establish a baseline on major facility systems that are at or near their end of life cycle. These systems, along with Business Unit requirements, sustainment requirements, and safety items, will inform the long-term Master Plan. The agency expects to complete the Master Plan by September 2024.

OIG Response

GPO's concurrence and planned actions are responsive to this recommendation.

Appendix A. Table of Recommendations

Recommendation	Management Response	Status	Return on Investment
Director			
1. Document the requirement for a Top 10 Safety Hazards list, in a directive or other guidance document. Include the following: a. the list's purpose and intended use throughout GPO; b. assigned responsibilities; c. details to be included in the Top 10 Safety Hazards List, like a description of the issue, the planned solution, a timeline history, safety risks to GPO personnel, and mission risk to GPO; d. the process for how hazards are identified, categorized, reported, updated, and closed.	GPO concurred with this recommendation. The Agency developed a draft directive addressing this recommendation and expects this effort to be complete by 31 December 2023.	Open	Non-Monetary – Improve management controls; improve systems/processes; improve safety, morale, health, and security; provide analysis/data to decision makers *Documenting the requirements of the Top 10 Safety Hazards list will allow management to identify the information they need to make decisions, as well as provide a consistent expectation of how the Top 10 Safety Hazards list is to be created, updated, shared, and used.*
2. Develop documented guidance to prioritize and address the Top 10 Safety Hazards. This could be a short checklist, or it could be a more extensive standard operating procedure.	GPO concurred with this recommendation. The Agency used a digital prioritization process during the FY 2024 Strategic Investment Planning Committee to rank all projects, including Top 10 Safety, for Congressional consideration and funding approval. Once the Agency has funding approved, it will consolidate all projects approved in FY 2024 with those that have been approved in prior years. The Agency will use the same digital tool to prioritize the funded projects. That approach ensures that the Top 10 Safety Hazards will remain on the list of high priorities. Written documentation of this process will be shared with the OIG to support the closure of this recommendation, and is expected to be completed by 31 December 2023.	Open	Non-Monetary – Improve management controls; improve systems/processes; improve safety, morale, health, and security *Documenting how the Top 10 Safety Hazards are to be prioritized and addressed will help Business Units prioritize their building needs in conjunction with addressing the Top 10 Safety Hazards list, and allow GPO leadership to direct the prioritization of the Top 10 Safety Hazards.*
3. Complete a Master Plan to address all of the buildings' needs for the next 10-20 years	GPO concurred with this recommendation.	Open	Non-Monetary – Initiate best business practices; provide analysis/data to decision

Recommendation	Management Response	Status	Return on Investment
Director			
or more, beyond the current project-specific "Facilities Management Master Plan," and use the Master Plan to prioritize projects.	Agency Support Operations has developed and is implementing an operational concept for an Agency-level Master Plan that captures requirements for the next 10-20 years. The Agency requested funding for a Facility Condition Assessment at the FY 2024 Strategic Investment Planning Committee to establish a baseline on major facility systems that are at or near their end of life cycle. These systems, along with Business Unit requirements, sustainment requirements, and safety items, will inform the long-term Master Plan. The Master Plan is expected to be completed by September 2024.		makers; avoid adverse publicity *Completing a Master Plan is a best business practice that will help GPO decision-makers identify how to prioritize resources to address the buildings' needs, in both the near-term and long-term.* Monetary – Avoidance of unnecessary expenditures; reducing requirements for equipment; any other savings that are specifically identified *Completing, and using, a Master Plan should allow GPO to have a better understanding of the buildings' needs, and help identify priority needs. This, in turn, should help GPO strategically schedule projects in a manner that prioritizes necessary tasks, without negatively impacting other projects.*

Appendix B. Scope and Methodology

Scope

Our team of inspectors performed this inspection of the GPO's Top 10 Safety Hazards Program. Our inspection focused on Security Services' Safety Branch, Agency Support Operations' Facility Division, and Acquisition Services. We reviewed GPO's Top 10 Safety Hazards lists identified in FYs 2017 – FY 2022, including their reporting, planning, and acquisition activities.

Methodology

The inspection team:

- Interviewed:
    - The Chief of Staff
    - The Safety and Health Manager
    - The Chief of the Facility Division
    - Managers and Supervisors within:
        - Security Services
        - Facility Division
        - Acquisition Services
- Reviewed GPO Directives, policies, and procedures; briefing documents; and electronic databases and records, including work orders, spot assessments, after-action reports, and photographs of pre- and post-work.
- Performed walk throughs of the GPO Central Office Complex buildings.

This inspection was conducted in accordance with the *Quality Standards for Inspections and Evaluations of the Council of the Inspectors General on Integrity and Efficiency*, December 2020 (Blue Book).

Appendix C. Abbreviations

FY	Fiscal Year
HVAC	Heating, Ventilation, and Air Conditioning
JCP	Joint Committee on Printing
MVO	Motor Vehicle Operators
OIG	Office of the Inspector General
PSSA	Physical Security and Safety Assessment

Appendix D. FY 2022 Top 10 Safety Hazards Information

In response to Objective 3 to analyze the status of each item on the FY 2022 Top 10 Safety Hazards, we summarize the Safety Hazards here. The information about each Safety Hazard includes, in the blue textboxes, the issue and the planned solution; in the red textboxes, the risks to GPO's mission and staff; and in the timeline chart, the history of the hazard.

The gold textbox displays a space to include any Leadership Support Needed and should be updated by the affected Business Units to identify what support they need from leadership to address the hazard. For example, at one point, Engineering Services needed additional personnel to draft acquisition documents and oversee contracts. At another point, it appeared that Acquisition Services was delayed in awarding contracts. For Appliance Permits, the Safety Branch, the Facility Division, and Business Units need to work together to identify a way forward to remove or re-inspect the various appliances for an updated permit. For Fire Extinguisher Hydrostatic Testing, which was previously Fire Extinguisher Inspection, the Safety Branch, the Facility Division, and Business Units also need to work together to determine if there can be any changes to the directive requiring monthly inspections of every fire extinguisher by one of the Facility Division's craft branches. Including the Purchase Requests and Contractor Numbers should help quickly and easily identify associated Acquisition Services information.

Our alternative way to display this data, including the additional information on the associated Purchase Requests and Contract Numbers and support needed from leadership, could be considered for GPO's future use. For example, the display could be used as an updated format for the Top 10 Safety Hazards list and as an Executive Dashboard display.

We also updated the Top 10 Safety Hazards information in these summaries to include updates from the FY 2023 Top 10 Safety Hazards list, which was delivered to GPO leadership in July 2023.

1. Basement Ceilings

The Issue:
Concrete chunks fell, and were removed, but the structure is now thin. The cracks eventually allowed water infiltration.

The Planned Solution:
Phase 1: Garage and basement concrete slab repairs

Phase 2: Sidewalk repair and basement waterproofing

Risks:
GPO Mission: Inability to store various materials. Garage not being used due to the condition.

GPO Staff: Physical injury due to falling concrete, or slip and falls due to drainage issues; exposure to environmental molds and pests.

2014-2017	2018-2019	2020-2021	2022	2023
2014 • Identified in a PSSA report **2016** • Added to Top 10 **2017** • Contractors to begin work in summer	**2018** • Design contract awarded (Nov) **2019** • Phase 1: Construction submitted to Acquisition Services	**2020** • Phase 1: Construction Contract Pending Acquisition Services **2021** • Phase 1: Acquisition Services construction award anticipated in 2nd quarter FY 2022 (1 Jan 2022 – 30 Mar 2022)	• Phase 1: construction contract to be awarded by 30 Sept 2022 • Phase 1: construction estimated completed by 2nd quarter FY 2023 (31 Mar 2023) • Phase 2: design to be finalized by 1st quarter FY 2023 (31 Dec 2022) • Phase 2: construction to be completed in FY 2024	• Phase 1: Concrete repairs started, estimated completion in Jul 2023 • Phase 2: Design contract pending Acquisition Services; estimated design in FY 2024. • Phase 2: Estimated construction in FY 2025.

Crumbled cement from ceiling joist

•Pile of crumbled cement
•Moisture in area of crumbles cement

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

2. Electrical Panels and Equipment

The Issue:
Noncompliance code issues, panels lack a cover over exposed wiring, poor panel location documentation, panels missing schedule of what the panel controls, electrical risers need to be replaced, GPO cannot add new connections to current panels.

The Planned Solution:
Replace approximately 250 panels, replace associated electrical feeders, design and install new powerhouse.

Risks:
GPO Mission: Limited risk as general employees do not have access to the panels, however GPO may have to shut down a building due to limited knowledge of what exactly the panels handle.

GPO Staff: Physical injury due to electrical shock. Locked panels decreased this risk, but it still exists for those who work on the panels.

2015-2018	2019	2020	2021	2022	2023
2015 • Identified in a PSSA report • Added to Top 10 • More unsafe panels found	• Purchase Request submitted for design to upgrade electrical panels	• Some funding received • Facilities Management planned to submit SOW during 4th quarter FY 2021 (Jul – Sep 2022)	• SOW and ICGE to be finalized 4th quarter FY 2021 (Jul – Sep 2022) • Analysis of panels contract Purchase Request estimated to be issued 1st quarter FY 2022 (Oct – Dec 2022)	• Analysis of panels contract Purchase Request estimated to be issued 4th quarter FY 2022 (Jul – Sep 2023)	• Facilities Management submitted a Purchase Request to seek analysis and recommendations for panel upgrades

Electrical panel without a cover over exposed wiring, and panels without schedules

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

3. H Street Loading Dock

The Issue:

GPO's most active loading dock has moderate to severe deterioration of the concrete driveway, ramps, drainage system, dock guards, bumpers, stairs, canopy, traffic signs/ controls, dock plate, ceiling, dock levelers, lights, doors, lights, air conditioning.

The Planned Solution:

Upgrade the H Street loading dock with security features, new and improved communication lights for delivery trucks, a sturdy enclosure, roll up doors, a HVAC system, and a driveway that can withstand maximum truck loads.

Phase 1: Design

Phase 2: Construction

Risks:

GPO Mission: Inability to ship or receive materials. Change in processes.

GPO Staff: Physical injury due to falling materials, or slip and falls due to drainage issues; exposure to environmental molds.

2018 – 2019	2020	2021	2022	2023
2018 • Identified in a PSSA report • Added to Top 10 • SOW written for design services	• Repair funding received	• Design firm identified and recommended to Acquisition Services • Pending solicitation process	• Acquisition Services expecting to award contract "very soon" • Additional funding requested due to increased costs for a design contract	• Acquisition Services design award anticipated 4th quarter FY 2023 (Jul 2023 – Sep 2023)

•Yellow tarp holding debris from falling insulation, and liquid, with a black hose extending down from the middle of the tarp, above a screening machine

•Falling insulation

•Black hose going into a 5 gallon buck, over part of the screening machine

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

4. Ductwork Cleaning

The Issue:

Some of the dust in the Ductwork has been determined to be explosible. Ducts have not been clean. It costs less for GPO to replace its ductwork versus cleaning it.

The Planned Solution:

Replace the ductwork as building renovations are designed and conducted by contracted parties.

Phase 1: Building A – 2nd and 6th floor; Building C - 4th floor; Building B – 8th floor

Phase 2: Building A – 4th floor; Building D – basement, 2nd and 3rd floor

Risks:

GPO Mission: Dirt from ducts impacted the quality of products.

GPO Staff: Physical injury if explosible material ignites; exposure to breathing irritants.

2015 – 2018	2019	2020-2021	2022	2023
2015 • Identified in a PSSA report **2016** • Added to Top 10 • 3rd party laboratory identified explosible dust **2017** • Planning to clean ductwork began **2018** • Planning to clean ductwork began	• Explosible dust in Baler room • Equipment that generates and collects dusts also pose explosible hazard, such as presses and binding equipment • Ductwork being replaced in construction areas	**2020** • Funding received to replace HVAC handlers and ductwork	• Phase 1: design contract in place, being designed • Facilities Management requesting additional finding in FY 2023 for design work	• Phase 1: design contract in place, being designed • Phase 2: added Building D basement, 2nd and 3rd floors • Future planning to depend on the GPO Building Utilization Plan

Before and after ductwork photos

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

5. Roof Fall Protection

The Issue:
Employees accessing roof cooling tower gages and valves need to walk on pipes feeding the tower. This damages pipe insulation and exposes employees to a potential fall and injury.

The Planned Solution:
As part of the removal of the three 98 presses, Facilities will build a catwalk. GPO employees will no longer need to walk on the pipes. Additionally, when the chiller plant is replaced, the replacement will take into consideration the need to access gages and valves.

Risks:
GPO Mission: If unable to access the gages and valves, GPO's data center and archival storage spaces could be impacted. Additionally, paper could become too brittle or too damp, and impact quality of printing.

GPO Staff: Physical injury due to falling.

2017 – 2019	2020	2021	2022	2023
2017 • Added to Top 10 **2019** • Employees continue to be exposed to the fall hazard	• Funding received to replace the chiller plant and cooling towers, which would include addressing the concern about walking on piping • Facilities Management would mitigate the risk	• Facilities Management planned to build a catwalk as part of removal of 98 group presses • Estimate start 2nd quarter FY 22 (Jan – Mar 2022)	• Employees continue to be exposed to the fall hazard • Piping still in place • Chiller plant replacement in design phase	• Pipes were removed, and employees can no longer walk on them • Accessing gages and valves is now a routine risk associated with ladder placement or scaffolding

Before and after photos with insulated piping in place and with insulated piping removed

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

6. Fire Safety

The Issue:

GPO stairwell fire doors have been modified and repaired over the years, impacting their capability to withstand a fire for the required time. The Fire Suppression System assessment identified numerous other issues.

The Planned Solution:

Phase 1: Fire Suppression System assessment

Phase 2: Request funding for design of the entire GPO fire suppression system

Phase 3: Prepare acquisitions paperwork for construction contract in FY 2024

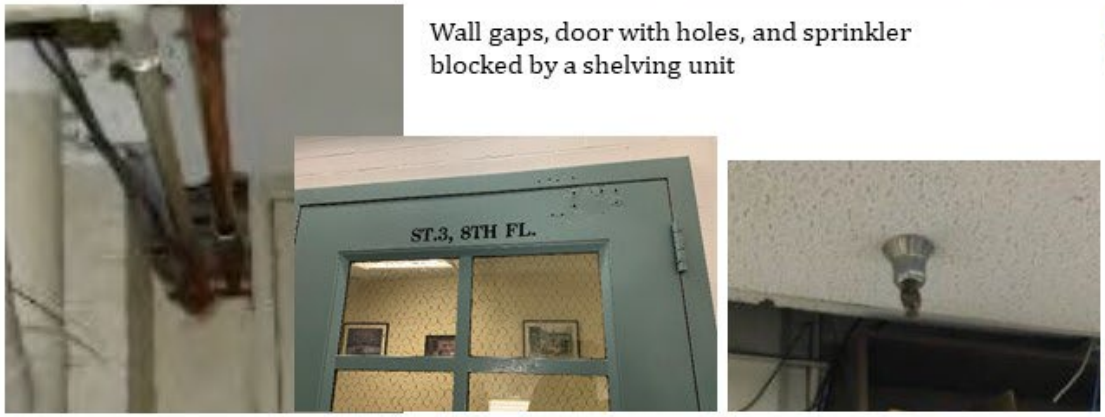
Phase 4: Construct fire suppression design

Risks:

GPO Mission: Damaged equipment or injured personnel, due to a fire, could cause a significant delay in meeting GPO's mission.

GPO Staff: A fire door failure could lead to loss of life, or to physical disabilities due to burns.

2017 – 2019	2020	2021	2022	2023
2017 • Identified in a PSSA report • Added to Top 10 • Identified as Firewall Gaps **2019** • 95% of the gaps were sealed	• Identified as Fire Doors • Fire doors must be evaluated and replaced, as needed	• Recommends an outside agency assess the fire doors for serviceability • Estimated in-house cost to replace fire doors: $1.7 million	• Renamed Fire Safety • Phase 1: Fire Suppression System assessment completed; numerous issues identified • Phase 2: Requesting funding for design of fire suppression system	• Phase 1: Completed • Phase 2: Pending funding request • Phase 3: FY 2024 • Phase 4: Post Phase 3



Wall gaps, door with holes, and sprinkler blocked by a shelving unit

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

7. Dust Collection System

The Issue:
Paper dust in GPO's five Dust Collection Systems presents a fire and explosive hazard to GPO's building and staff. Paper dust could ignite and cause an explosion and a fire. Fire could migrate to other parts of GPO through the ductwork.

The Planned Solution:
Replacing the remaining dust collection systems: Bailer system and Carpenter Shop

Risks:
GPO Mission: A fire or explosion could damage GPO equipment, preventing GPO from printing materials.

GPO Staff: A fire could lead to loss of life or physical injury.

2016 - 2017	2018 - 2019	2020	2021	2022	2023
2016 • Lab report identified explosible dust **2017** • Added to Top 10	**2018** • Two dust collection systems replaced **2019** • Purchase Request submitted for design to replace dust collection system	• Resource to replace dust collection systems received • Carpenter Shop system to be replaced in FY 2021 • Remaining systems to be replaced in FY 2023	• "System 5" being installed • Carpenter Shop system to be replaced in FY 2022 • Cyclone Bailer system to be replaced in 1st quarter 2022 (Oct – Dec 2022)	• Bailer system and dust collector replacement project to be put out for bid in 3rd quarter FY 2023 (Apr – Jun 2023) • Carpenter Shop system to be replaced in FY 2023	• Bailer system and dust collector replacement project PRs to be submitted in 1st quarter FY 2024 (Oct – Dec 2023) • Carpenter Shop system purchase request to be submitted in 1st quarter FY 2024 (Oct – Dec 2023)

Dust collection system and its collection bin

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

8. Fire Extinguisher Hydrostatic Testing

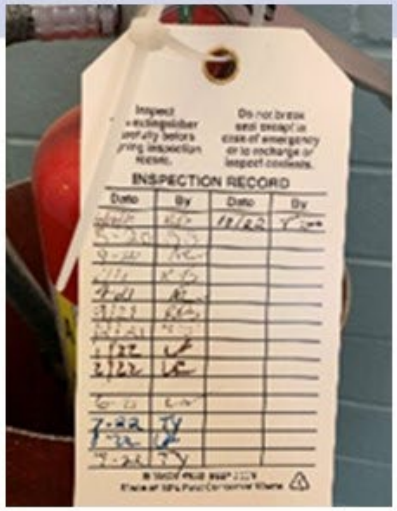
The Issue:
GPO's fire extinguishers are required to be inspected monthly, but those inspections are not happening. Additionally, the fire extinguishers are 12 years old and require hydrostatic testing.

The Planned Solution:
- Safety Branch provided a new fire extinguisher layout map to reduce the number of extinguishers
- Facilities Management requested changes to the responsibility for fire extinguisher inspections
- Hydrostatic testing completed in FY 2023

Risks:
GPO Mission: Inoperable fire extinguisher could result in sprinkler water damage to equipment and paper, preventing GPO from printing and delivering products.

GPO Staff: Physical injury due to inability to address immediate fire, slip and falls due to sprinkler water.

2020 – 2021	2022	2023
2020 • Identified in a 2020 PSSA report **2021** • Originally added to Top 10 as "Fire Extinguisher Inspections"	• Name changed to "Fire Extinguisher Hydrostatic Testing" • Fire extinguisher are 12 years old, and require hydrostatic testing. • Safety Branch requested funding for FY 2023, and will submit a PR for hydrostatic testing	• Fire extinguisher hydrostatic testing completed • Removed from Top 10 Safety Hazards list • Fire extinguishers still not consistently inspected monthly, and changes to layout and responsibility not addressed



Fire extinguisher inspection tag showing inconsistent inspections between February and June 2022

Image taken October 24, 2022

Fire extinguisher inspection tag showing inconsistent inspections: April 2021, May 2021, April 2022

Leadership Support Needed:

Purchase Requests:

Contract Numbers:

9. Motor Vehicle Licensing

The Issue:

Motor Vehicle Operators are not GPO-licensed. MVO operators need physicals. Medical Services has a backlog of needed MVO medical physicals. MVO operators have failed physicals.

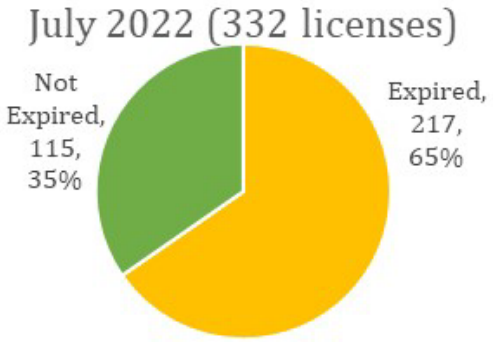
The Planned Solution:

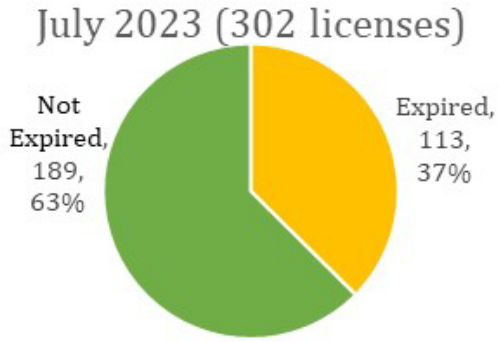
- Safety Branch provided notice that driving with an expired GPO-license is not permitted
- Safety Branch is checking licenses

Risks:

GPO Mission: Materials may not be moved, do to a lack of a GPO-license. Materials may not be where they need to be, when they need to be there. GPO may not be able to print, produce, and deliver materials. Machinery and the GPO building could be damaged due to faulting driving.

GPO Staff: Staff may injure themselves or others. GPO-licenses require annual physicals, that help identify needed medical attention. Without current GPO-licenses, staff may operate machinery in a poor manner, damaging the machinery or the GPO building.





2022	2023
• Added to Top 10 • Medical Services backlog of physicals	• Medical Services cleared backlog • Safety Branch provided notice that driving with an expired GPO-license is not permitted • Safety Branch is checking licenses

Leadership Support Needed:

Purchase Requests: None

Contract Numbers: None

10. Appliance Permits

The Issue:

Appliance permits in offices with minimal to no manning have expired, and have been expired for more than 3 years. GPO has a process to permit appliances, but no clear process of re-permitting appliances, or regularly re-inspecting appliances to avoid permit expiration, nor what to do with the appliance when a responsible employee departs GPO.

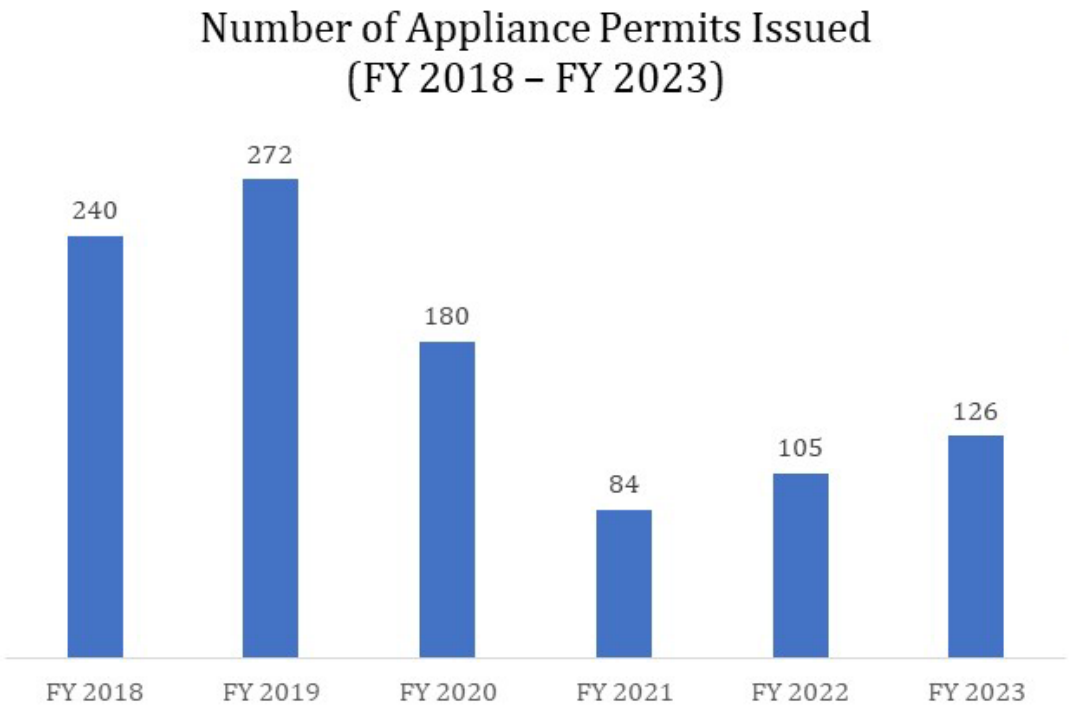
The Planned Solution:

At some point, the appliances will need to be used or removed. If there is a potential for them to be used, they need to be re-inspected.

Risks:

GPO Mission: Faulty appliances could ignite, or too many appliances could be plugged in to one outlet. This could potentially cause a fire in the building.

GPO Staff: Physical injury due to faulty appliances or an overloaded outlet.



2022	2023
• Added to Top 10 • Offices with minimal or no manning have expired appliance permits; some have been expired more then 3 years • Appliances need to be re-inspected or removed	• Appliance permits still need to be renewed • Electric Branch is inspecting equipment within 1 week of request

Leadership Support Needed:

Purchase Requests: None

Contract Numbers: None

HUGH NATHANIAL HALPERN
Director

GPO

MEMORANDUM

Date: September 22, 2023

To: Inspector General

Subject: Agency Response to the OIG Draft Report on the Top Ten Safety Hazard Program Inspection 22-02-II

Thank you for the opportunity to offer the Agency's response to the Draft Report on the Top Ten Safety Hazard Program Inspection 22-02-II.

In General

The Government Publishing Office appreciates the professionalism of the OIG team and the three recommendations which the Agency will work to close as quickly as possible.

Agency Response to Recommendations in the Draft Report

Recommendation 1

Document the requirement for a Top 10 Safety Hazards list in a directive or other guidance document. Include the following:

a. *detail the list's purpose and intended use throughout GPO;*
b. *assign responsibilities;*
c. *include more details for the Top 10 Safety Hazards List, like a description of the issue, the planned solution, a timeline history, safety risks to GPO personnel, and mission risk to GPO;*
d. *describe the process for how hazards are identified, categorized, reported, updated, and closed.*

GPO concurs with this recommendation.

The Agency developed a draft directive addressing this recommendation and it is currently being staffed for coordination. I expect this effort to be complet by 31 Dec 2023.

Recommendation 2

Develop documented guidance to prioritize and address the Top 10 Safety Hazards. This could be a short checklist, or it could be a more extensive standard operating procedure.

GPO concurs with this recommendation.

The Agency used a digital prioritization process during the FY 2024 Strategic Investment Planning Committee (SIPC) to rank all projects, including Top 10 Safety, for Congressional consideration and funding approval. Once the Agency has funding approved, it will

consolidate all projects approved in FY 2024 with those that have been approved in prior years. The Agency will use the same digital tool to prioritize the funded projects. That approach ensures that the Top 10 Safety Hazards will remain on the list of high priorities. Written documentation of this process will be shared with the OIG to support the closure of this recommendation. I expect thi effort to be completed by 31 Dec 2023.

Recommendation 3

Complete a Master Plan to address all of the buildings' needs for the next 10-20 years or more beyond the current project-specific "Facilities Management Master Plan," and use the Master Plan to prioritize projects.

GPO concurs with this recommendation.

Agency Support Operations has developed and is implementing an operational concept for an Agency-level Master Plan that captures requirements for the next 10-20 years. The Agency requested funding for a Facility Condition Assessment at the FY 2024 SIPC to establish a baseline on major facility systems that are at or near their end of life cycle. These systems, along with Business Unit requirements, sustainment requirements, and safety items, will inform the long-term Master Plan. The Master Plan is expected to be completed by September 2024.

Thank you for the opportunity to provide the Agency's input on this product from your office. The Agency spent approximately 217.0 hours responding to data calls, presenting information to the OIG inspectors, and preparing this management response.

If you have any questions, please contact me.

HUGH NATHANIAL HALPERN

cc: **Deputy Director**
Chief of Staff
General Counsel