

EXHIBIT C

WASA's Comprehensive Safety Program Matrix

Comprehensive Safety Program Matrix

WASA WIDE Key CSP Program Components that need to be further reviewed and/or implemented.	A	B	C	D	E	F	G	H	I	J	K	L
TRAINING REQUIRED FOR DIFFERENT WORK GROUPS												
First Aid	x	x	x	x	x	x	x	x	x	x		x
CPR	x	x	x		x	x	x	x	x	x		x
Fire Evacuation		x	x	x	x		x	x	x			x
Initial & Annual Hazard Communication	x	x	x	x	x	x	x	x	x	x		x
Initial & Annual Hazardous Waste Storing and Handling	x	x	x	x								x
Fork lift Operator Certification		x	x	x		x						x
Personal Protective Equipment (PPE)	x	x	x	x	x		x	x				x
Initial CDL and Refresher			x	x								
General Office Safety												
OSHA, ADA, EEOC Signage Requirements												
Is there an OSHA 200 Log?											x	
Is there an OSHA poster posted?	x	x		x	x	x	x	x	x	x	x	x
Emergency phone numbers not readily found in case of an emergency, 29 CFR 1926.50 (f)				x	x		x	x	x		x	x
Egress plan needed NFPA 101		x		x	x	x	x	x	x	x	x	x
Is the Family and Medical Leave Act notice properly displayed, 29 CFR 825.300(a)	x	x	x	x	x	x	x	x	x	x	x	x
Is the OSHA 2203 poster properly displayed, 29 CFR 1903.2(a)(1)	x	x		x	x	x	x	x	x	x	x	x
Is the EEOC's American With Disabilities poster displayed, 42 USC 12115, Title I, Sec. 5	x	x	x	x	x	x	x	x	x		x	x
FACILITY INSPECTIONS												
Is the facility manager regularly conducts safety inspections of the work areas or job sites	x	x	x			x				x		x
HOUSE KEEPING/MAINTENANCE												
Is all work surfaces, machinery, equipment and instrument kept clean and properly maintained?		x	x	x			x					x
EMERGENCY RESPONSE PROGRAM												
Is an emergency response program in place, 29 CFR 1926.35(a)		x	x							x		
Confirm that emergency plan addresses roles and responsibility of staff		x	x							x		
Have all employees been informed of the preferred means of reporting emergencies, such as manual pull box alarms, public address systems, radio or telephones? 29 CFR 1910.165(b)(4)		x	x	x	x		x	x	x			x
Are emergency telephone numbers posted near telephones, or employee notice boards, and other conspicuous locations? 29 CFR 1910.165(b)(4)			x	x	x		x	x	x	x		x

Key

A - Blue Plains Main Laboratory
D - Central Maintenance Facilities (CMF)
G - Primary & Secondary Treatment
J - Central Operations Facility/IT Building

B - Department of Sewer Services, O Street
E - Solid Processing Building
H - Nitrification Treatment
K - DSS Pumping Stations & CSO Sites

C - Department of Water Services, Bryant Street
F - Fleet Management Services, O Street
I - Materiel Management
L- Facilities - Buildings & Grounds

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Confirm emergency team is selected and/or capable to respond to HAZMAT, and HazWaste incidents, 29 CFR 1910.120		x	x	x	x		x	x				x
HAZARD EVALUATION												
Conduct a wall to wall walk through evaluation of select operations on an annual basis, no later than June of each calendar year.		x										
Construction plans, specifications, and contracts are not being reviewed for occupational safety and health implications.		x	x	x	x		x	x		x		x
HAZARD COMMUNICATION PROGRAM- CONCERNS												
Material Safety Data Sheets (MSDSs) may not be available for all HazMat used/stored.		x	x	x	x		x	x				x
Completeness of Material Safety Data Sheets												
Contractual Requirements for Suppliers (Contract Clause)	x	x	x	x								
All HazMat containers may not be labeled as to their contents and associated hazards.	x		x	x								
EXCAVATION & CONSTRUCTION												
Warning vests or other highly visible clothing provided and worn by all employees exposed to public vehicular traffic.		x										
Ladders used in excavations secured and extended three feet above the edge of the trench.												
Support systems provided in ensure stability of adjacent structures, buildings, roadways, sidewalks, walls, etc.		x	x									
Employees protected from cave-ins when entering or exiting the excavation.												
Surface water or runoff diverted or controlled to prevent accumulation in the excavation		x										
Employees trained to use personal protective and other rescue equipment		x										
Atmosphere within the excavation tested where there is a reasonable possibility of an oxygen deficiency, combustible or other harmful contaminant exposing employees to a hazard.												
MEDICAL SURVEILLANCE PROGRAM – CONCERNS 29 CFR 1910.95 & 1910.96												
All hazardous operations that require employees' participation in medical surveillance program have been identified. These operations are respiratory protection program, hearing conservation program, hazardous waste disposal, lead, asbestos, DOT/CDL notifications of drivers part 391 and DOT/CDL controlled substance part 382		x	x	x	x		x	x				x
All employees that need to participate in medical surveillance program have been identified		x		x	x		x	x				x

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All employee have received Pre-placement, annual (if required), and termination medical exams.	x	x	x	x	x		x	x		x		x
FIRST AID & BLOODBORNE PATHOGEN PROGRAM 29 CFR 19 10.1 030												
At fixed work places, can each employee exposed to electric shock be reached by a person trained in CPR within 4 minutes? 29 CFR 1910.269(b)(1)(ii)			x	x	x		x	x		x		
Are Universal Precautions, i.e., Engineering & Work Practice Controls, Personal Protective Equipment and Housekeeping Measures Taken?		x	x								x	
FIRE AND LOSS PREVENTION												
Review & implementation of fire prevention and protection program		x		x	x		x	x				x
Review recharging, inspection, and maintenance of fire prevention equipment, alarms, sprinklers, etc.				x	x	x	x				x	x
Are fire extinguishers inspected monthly by facility managers/representatives and noted on the inspection tag?											x	
PERSONAL PROTECTIVE EQUIPMENT (PPE) - Concerns												
Appropriate PPE may not be provided nor is their use being ensured by supervisors.		x	x	x	x	x						x
Proper types and inventories of PPE available				x	x	x	x	x				x
Confirm procedures for selecting and issuing and storage of PPE			x	x	x	x	x	x				x
RESPIRATOR PROTECTION PROGRAM												
Review the facility's written respirator program,		x										
Confirm that employees have been trained, fit tested, and medically examined		x		x			x	x				x
Confirm that respirators used , stored , cleaned, bagged properly		x										
CONFINED SPACE ENTRY 29 CFR 1910.146												
Adequate precautions taken to protect employees from exposure to an atmosphere containing less than 19.5% oxygen and/or to other hazardous atmospheres				x								
Ventilation provided to prevent employee exposure to an atmosphere containing flammable gas in excess of 10% of the lower explosive limit of the gas.												
Air monitoring for O, CO, SO2, CO2, and VOC conducted often to ensure that the atmosphere inside confined space remains safe.												
ACCIDENT RECORDING & REPORTING OF OCCUPATIONAL INJURIES/ILLNESSES												
In case of an on-the-job accident, injury, or illness, are proper procedures being followed												

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Are supervisors familiar with using proper accident/illness forms and reporting procedures and requirements?	x	x				x					x	
Are there permanently disabled employees assigned to this facility?			x						x			
DOT/COMMERCIAL DRIVER LICENSES (CDL)												
License Requirements				x		x					x	
Controlled Substance Part 382 Driver/Supervisor Responsibilities (Post Accident)				x		x					x	
Defense Driving		x									x	
Compliance with PM Requirements			x								x	
Accident Reporting Procedures		x				x					x	
HEARING PROTECTION PROGRAM												
Evaluate the facility's hearing protection program		x	x	x	x	x	x	x				x
Develop a listing of potential noise control areas			x	x	x		x	x				x
Review in-house noise survey documents for regulatory standards			x	x	x		x	x				x
Evaluate whether personal protective equipment is needed		x		x	x		x	x				x
Confirm that employees were monitored for noise exposures			x	x	x		x	x				x
Evaluate the adequacy of hearing protectors and engineering controls				x	x		x	x				x
SOLID AND HAZARDOUS WASTE												
Hazardous Waste Generation & Waste Characteristics	x	x				x						
Review and implementation of empty Aerosol cans disposal		x	x	x						x		x
Review and implementation of Waste Chemical disposal												
Review and implementation of Fluorescent Light Bulbs disposal		x	x							x		
Review and implementation of used/spent Batteries disposal												
Review and implementation of Compressed Gas Cylinders disposal			x	x	x		x	x		x		x
Review and implementation of Used Oil disposal & management												
Review and implementation of Paints disposal		x	x									
Is emergency information posted in every area where you store hazardous waste?				x	x	x	x	x			x	x
SPILL PREVENTION AND COUNTERMEASURE PROGRAM												
Oil Spill recovery and control				x	x	x	x	x				
Is emergency information posted near any above ground storage tank (AST)? 40 CFR 262.34		x				x	x				x	x
Are all above ground tanks have secondary containment IAW 40 CFR 265.193 (a)- (b)- (c)					x		x					x
PCB MANAGEMENT PROGRAM												
Documentation and Confirmation of PCB Analysis Results												
Past Disposal Practices												
Documentation of past spills												

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Labels on Transformers												
AIR POLLUTION CONTROL												
Permits and Registrations												
Emission Inventory												
Fugitive Dust												
Fuel Oil Storage's				x								
Emission Opacities												
Monitoring Equipment-Calibration												
Toxic Pollutants												
Stack Heights												
Proximity to Residential Areas												
Odors												
Boilers, Incinerators, Unit Heaters, Hoods			x									
Process Equipment												
Scrubbers, Bag houses, Cyclones						x		x				x
Paint Spray Booths												
Vapor Recovery System												
Cyclone Discharge Rates												
Log of Pressure Drop Across Scrubbers												
Corrosion on Recirculating Pumps on Scrubbers												
Pressure Drop Across Bag houses												
Maintenance Logs												
WATER POLLUTION CONTROL												
Discharge Points												
Surface Water Run-Off												
Waste Piles												
Floor Drains								x				
Monitoring Equipment-Calibration												
Sampling Locations												
Odors							x					
Septic Systems												
Groundwater Discharges			x									
Neutralization Tanks												
Alarm Systems			x									
General Housekeeping			x									
Warning Signs												
Sludge Disposal												
INDUSTRIAL HYGIENE MONITORING PROGRAM												
Hazard Recognition and Identification		x	x	x	x		x	x		x		x

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Monitoring Systems		x		x	x		x	x				x
Sampling Strategies		x		x	x		x	x				x
Maintenance of Monitoring Equipment		x		x	x		x	x				x
Quality Assurance Programs for Equipment		x		x	x		x	x				x
Reporting and Recordkeeping Procedures		x	x	x	x		x	x		x		x
RECOMMENDATIONS												
PHOTOGRAPHS												

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EXHIBIT D

WASA's Response to the Draft Report



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

OFFICE OF THE GENERAL MANAGER

TEL: 202-787-2609

FAX: 202-787-2333

December 14, 2001

Charles C. Maddox, Esq.
Inspector General
717 14th Street N.W.
Washington D.C. 20005

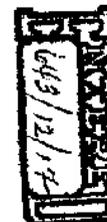
RE: Draft Follow up Review DCWASA
Project OIG-01-2-15LA

Dear Mr. Maddox:

I write to make specific comments on the seven recommendations contained in the Draft Follow-Up Management Review of the District of Columbia Water and Sewer Authority (Blue Plains). I address only the status of recommendations that have been identified as either ongoing or open because I concur with your assessment regarding the items identified as "closed". My view, except as otherwise expressed below, is that that all items should be regarded as closed. A point-by-point response similar to my prior communications on this topic is not indicated because I think the draft follow-up report demonstrates a general appreciation of WASA's focused efforts and progress in addressing safety. Be assured that, as demonstrated by our actions prior to and during your previous review through the current time, safety is of the utmost importance. We are very serious about the safety of the general public as well as our employees.

The summary of recommendations contained in your November 28, 2001 letter is repeated below:

	Subject Matter	Directed To	Status
1	Resolve all previous recommendations	WASA	Ongoing
2	Ensure potable water is delivered to employees	WASA	Ongoing
3	Amend Previous testimony	WASA	Closed
4	Establish and maintain performance measures for bonuses	WASA	Closed
5	Improve Database elements for training and maintenance management (MMS) systems	WASA	Ongoing
6	Reporting Structure of Safety Committee	WASA	Open
7	Legislative authority of D.C. OSHA	D.C. OSHA	Ongoing



2001 DEC 17 PM 3:35

Charles C. Maddox, Esq.
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Process Safety and related operations have been and will continue to be implemented in a manner that reflects current operations. Please note that wastewater operations at Blue Plains no longer require Chlorine or Sulfur Dioxide. Health and safety risks associated with the storage and utilization of these chemicals have been eliminated. In addition, the digesters were decommissioned well over a year ago, thereby eliminating any concerns regarding the generation of methane gas.

Statements in the report concerning OSHA 29 C.F.R. 1910.119 (Highly Hazardous Chemicals) requirements should be reevaluated and changed to reflect the fact that Chlorine and Sulfur Dioxide are no longer utilized at Blue Plains. Therefore, citations to process hazard requirements for these chemicals are no longer appropriate.

I appreciate your acknowledgment of WASA's Comprehensive Safety Program ("CSP"). The program and plan addresses several topics with specificity and is modeled in part on OSHA, and best industry standards. The CSP addresses: work site safety analyses, accident and hazard abatement, safety training, accident investigation, chemical use and disposal management, emergency response planning, defensive driving, respiratory protection, fleet safety and management reporting systems.

I also appreciate your acknowledgement the commitment of management and the Board of Director's to implementation of the CSP. The Board of Directors has created the Safety and Emergency Planning subcommittee as a component of its standing Operations Committee. The subcommittee is comprised of 3 Board Members and has convened monthly since May 17, 2001 to review CSP implementation and emergency planning. Minutes of these meetings can be made available if you request.

I have reviewed your separate letter to Mr. Glenn Gerstell, Chairman, Board of Directors. He is currently out of the country and unavailable to meet your requested December 14th response time. However, following consultation with him, he has directed that only one response be provided from WASA. In addressing your specific recommendation, the reporting relationship will remain through the General Manager to the Board of Directors. We believe that the establishment of a Board level committee to specifically focus on safety issues is an appropriate and efficient way to monitor and direct the safety and emergency planning activities of the Authority. This approach has the endorsement of the Board of Directors.

In February of this year I promulgated 19 Health and Safety policies. These 19 policies were developed after consultation with employee representatives and serve as cornerstones to the CSP. Collectively, the policies address the most common components of successful Water and Wastewater Utility Safety and Health Programs.

An effective health and safety program will always change to address current needs. Examples of continuing adjustments in subject areas discussed in the draft follow up report include:

- Conduct a plant wide evacuation drill – It is impractical for WASA conduct such a drill without coordination with fire, police and surrounding residential and institutional neighbors. A properly coordinated plant wide drill is under consideration.
- Provide self contained breathing apparatus (SCBA) to all employees - With the removal of chlorine and sulfur dioxide from the plant, the use of SCBA will be curtailed and limited to employees expected to respond to other plant emergencies requiring SCBA.
- Ensure adequate ventilation in all buildings - The Facilities Department has conducted an assessment and will develop a plan to address this issue.
- Identify confined spaces at all plant locations – The inventory has been completed. Marking these spaces will be accomplished in accordance with an approved work plan.
- Inspect chain guards, railings, grates, catwalks, etc. – A formal inspection program exists and housekeeping performance measures are incorporated in the employee and supervisor annual performance evaluations.
- Disseminating safety related policies and procedures – These procedures have been disseminated and are available. In addition to dissemination, employees have been provided the associated training.
- Posting of safety signage - This is a vague comment, but WASA personnel have posted a number of safety signs throughout the plant
- *Perform inspections and maintenance of ladders and equipment associated with cranes* - Crane inspection and training programs have been established.

Please also note that implementation of the Maintenance Management System has commenced.

It is also our view that the Authority has adequately responded to the concern for the quality drinking water at the plant. In the one year period May 2000-April 2001, the Authority replaced 31 water fountains and conducted tests in response to employee concerns. Water at the Blue Plains Plant is tested regularly by the U.S. Army Corps of

Charles C. Maddox, Esq
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Engineers under an agreement with WASA, as it is throughout the city. In addition to this regular, routine testing the Authority will continue to respond to employee concerns regarding the quality of water. We are not aware of any current issues relating to quality of drinking water provided at Blue Plains or at any other location.

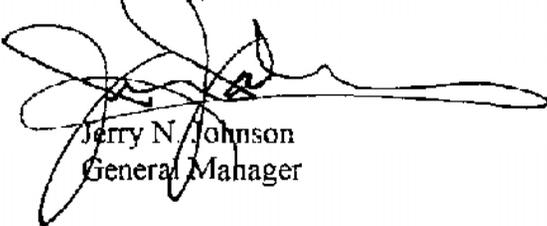
As you have indicated in your report, the Authority has developed a computerized training module. The training module is meeting the objective for which it was designed – management of an effective training database. The Authority will consider your recommendations regarding further development and improvement of that database. However, inclusion of documentation of contractor safety training within that database is not likely. You may nevertheless be assured that an evaluation of other mechanisms to record the reporting of required training by contractors will occur.

Finally, with respect to the final recommendation it appears again to not be appropriately placed in this report since it is not a WASA responsibility and WASA has no authority to implement the recommendation.

Your staff has assisted in pointing out a number of issues that have benefited the pace of development of our safety program. Thank you for your efforts. To summarize, it is my opinion that all matters should be listed as closed.

Should you have questions, desire additional information, or have interest in an exit conference, my staff or I am available and you should not hesitate to contact us

Sincerely,



Jerry N. Johnson
General Manager

EXHIBIT E

DOES Response to the Draft Report

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Employment Services
Office of the Director

2001 DEC 12 PM 3: 35

★★★



Gregory P. Irish
Director

(202) 671-1900-Voice
(202) 673-6976-Fax

MEMORANDUM



TO: Charles C. Maddox, Esq.
Inspector General

FROM: Gregory P. Irish
Director

DATE: DEC 11 2001

SUBJECT: DC OIG Audit Report Number OIG-01-2-151A on District of Columbia
Water and Sewer Authority (WASA)

This is our response to your December 3, 2001 correspondence regarding the subject audit report. You requested a status report on proposed enhancements and legislative action pursued to strengthen the effectiveness of the D.C. Occupation Safety and Health (OSH) Public Sector Program.

Our initial response to you was dated October 31, 2000. At that time we outlined a Five Year Plan by which to achieve an improved program to encourage occupational safety and health for the government workers in the District of Columbia. However, shortly thereafter organizational transition of the public sector OSH program became the primary focus. Effective October 1, 2001, this program became the responsibility of the District's Office of Risk Management. The Memorandum of Understanding which formalized this transition is attached.

Should you desire information regarding the planned program improvements please contact James Jacobs, Office of Risk Management in (202) 727-6053.

Enclosure

**MEMORANDUM OF UNDERSTANDING (MOU)
BETWEEN
THE DEPARTMENT OF EMPLOYMENT SERVICES
AND
THE OFFICE OF RISK MANAGEMENT
TO
IMPLEMENT THE PUBLIC SECTOR OCCUPATIONAL SAFETY AND
HEALTH PROGRAM IN THE DISTRICT OF COLUMBIA**

I. Purpose

To specify the terms and conditions under which Public Sector Occupational Safety and Health (OSH) activities will be performed by the District of Columbia, Office of Risk Management (ORM), on behalf of the Department of Employment Services (DOES), until such time as a reorganization plan in support of the Office of Risk Management is enacted by the Council of the District of Columbia, and clears the Congressional review period.

The District of Columbia government is committed to maintaining a safe work environment for employees and general users of public facilities in the District. Health and safety issues are essential components of a risk management program.

A core purpose of the ORM is to maintain a proactive, comprehensive program of risk assessment and control that minimizes the frequency, severity, and probability of risks and the impact of losses through a District-wide integrated risk management program. Occupational safety and health risks will be integrated into the comprehensive risk management program of the ORM, as part of its Risk Control Division functions.

II. Controlling Laws and Authorities

The Office of Occupational Safety and Health is responsible for administering a public sector program which ensures a safe and healthy work environment for all employees and general users of public facilities in the District of Columbia. The statutory mandates for this Office are set forth in Title XX of the Comprehensive Merit Personnel Act of 1978, as amended (D.C. Law 2-139), and the following safety standards, codes and inspection requirements.

- DC Occupational Safety and Health Board Standards;
- The Building Code approved pursuant to the Construction Codes Approval and Amendments Act of 1986, DC Law 6-216;
- The Electrical Code approved pursuant to DC Law 6-216;
- The Fire Prevention Code approved pursuant to DC Law 6-216; and
- The Plumbing Code approved pursuant to DC Law 6-216.

III. Scope

- A. DOES will provide, through an inter-agency transfer, staff and funds for ORM to operate a Public Sector OSH Program.
- B. DOES will continue to operate the Private Sector OSH Consultation Program and submit all required reports to the appropriate federal officials.
- C. DOES will be the recipient of funds from the federal and local government for OSH programs, until such time as the authorizing legislation transferring the OSH Public Sector Program is enacted. The Director, DOES, will be the signatory on grant fund agreements with the federal Occupational Safety and Health Administration (OSHA). DOES will prepare applications for federal OSHA funds and provide administrative support for grant activities.

IV. Services to be Provided by Office of Risk Management

The ORM will administer the Public Sector OSH Program, providing assistance to District government agencies and offices in developing and maintaining an effective safety and health program, with an emphasis on abating workplace hazards and risks.

The Public Sector OSH Program will perform the following:

1. provide assistance to District government agencies and offices in recognizing hazards in the workplace;
2. make recommendations on approaches or options for solving safety and health problems;
3. provide safety training and education to District employees and Collateral Duty Safety Officers;
4. conduct accident and complaint investigations;
5. provide quarterly reports to the District Risk Manager including the number of complaint investigations, inspections, abatements, and consultations conducted; and
6. other ORM Risk Division functions as determined by the District Risk Manager.

Until such time, when the Public Sector Program is transferred to the ORM, DOES will prepare in consultation with ORM, all budget and reports required by the District of Columbia government.

V. Services to be Provided by the DOES

All federally funded OSH Consultation requirements under the Private Sector Program will be the responsibility of DOES.

The Private Sector OSH Program will perform the following:

1. consultation with private sector employers to prevent injuries and illnesses from exposure to hazardous workplace conditions or practices;
2. identification of any safety and health hazards in private sector workplaces, focusing particularly on small businesses;
3. recommendation of approaches or options for solving safety and health problems;
4. education and training provided to private sector employers and their employees on applicable federal laws and regulations; and
5. provision of quarterly reports and other federally required information to the DOES Director and the Department of Labor.

DOES will prepare all federal documents/applications for OSH Private Sector funding.

VI. Effective Date and Period of Agreement

This agreement/MOU shall be effective upon the signature of both parties (Director, DOES and Director, ORM), and shall remain in effect until such time as a reorganization plan in support of the ORM, which includes the transfer of the Public Sector OSH program to the Office of Risk Management, is enacted by the Council of the District of Columbia and clears the Congressional review period. This agreement/MOU shall remain in effect until terminated as set forth in Paragraph IX.

VII. Resource Commitment

DOES and the ORM agree that local funds and systems necessary for the Public Sector OSH Program staff and services specified in this MOU are available. Specifically, local funds are available in DOES' FY 2002 Budget to underwrite salaries and benefits of an Occupational Safety and Health Specialist at the DS-12 grade, an Industrial Hygienist at the DS-12 grade, a vacant Administrative Aide at the DS-7 grade and a vacant Occupational Safety and Health Specialist at the DS-11 grade. Existing DOES equipment for the conduct of the Public Sector OSH Program activities will be transferred to the ORM.

VIII. Changes or Termination

This agreement/MOU can be terminated or amended at any time with sixty (60) days prior written notice and upon mutual agreement of the parties involved.

IX. Transition Provision

DOES will ensure the smooth transition of the OSH Public Sector program and services by assigning or detailing OSH Public Sector staff to the ORM.

X. Effective Date

This agreement/MOU shall become effective when signed by the Director, DOES and the Director, ORM. The date upon which services will be assumed by the ORM, however, is dependent on DOES' ability to transfer its existing OSH Public Sector staff, and the availability of office space at ORM.

XI. Authority/Signatories



Gregory P. Irish
Director
Department of Employment Services

AUG 21 2001
Date



James J. Jacobs
Director
Office of Risk Management

AUGUST 22, 2001
Date



John A. Koskinen
Deputy Mayor and City Administrator
Office of the City Administrator

8, 22-01
Date