



June 30, 2022

Bruce Miles
District Supervisor
North Carolina Department of Labor
Occupational Safety and Health Division
Compliance Bureau
1101 Mail Service Center
Raleigh, NC 27699-1101

Re: Complaint Number 209751387

Dear Mr. Miles:

I am writing in response to your June 22, 2022 letter to Kathleen Caron, Professor and Chair, Department of Cell Biology & Physiology, School of Medicine. The letter was received by the University of North Carolina at Chapel Hill (“UNC-CH”) Department of Environment, Health, and Safety (“EHS”) Tuesday, June 28, 2022. Your letter described alleged health and/or safety hazards at 111 Mason Farm Rd., Chapel Hill, NC 27514. The facility at this location is the Medical Biomolecular Research Building (“MBRB”) which houses several School of Medicine departments.

MBRB is an eight-story building that was constructed in 2003 and houses research laboratories, offices, and an auditorium. As described in further detail below, the University began upgrades to the fire safety system in this building in April of 2022. The fire alarm panel at MBRB was an older model Notifier AM-2020 that had been discontinued by the manufacturer and therefore was recently selected by Facilities for replacement. The University followed appropriate safety protocols during the downtime of this system necessary for its replacement. The University takes any potential hazard to the well-being of its employees very seriously. UNC-CH EHS, in conjunction with Facilities Services and the School of Medicine, will take necessary measures to correct any concerns identified during the investigation of this complaint. The items addressing the concerns are provided below. If the complainant(s) have more questions, they are welcome to contact our office at any time, and we will be glad to discuss these items in greater detail in person.

Hazard Description:

Employees are concerned about fire evacuation emergencies due to the fire alarm and fire suppression system not functioning. The employer has not provided measures to alert nor evacuate employees located on the 7th floor.

UNC-EHS Response:

During the MBRB fire alarm system upgrades, the fire alarm panel was shut down and removed. All communications from the dialer to the UNC Police - 911 Communication Center were turned off. The sprinkler system was not impaired and would still activate; however, due to the dialer not being online, a waterflow alarm would not communicate with the 911 Communication Center. All audible devices (speakers/strobes) also had power removed from them so they would not alert locally.

MBRB phase 1 for fire alarm system panel replacement began on April 25, 2022 and concluded with acceptance testing on June 17, 2022. Phase 2 which includes replacement of system audible devices (speakers /strobes) began on June 27, 2022, is on-going and will tentatively run through July 29, 2022.

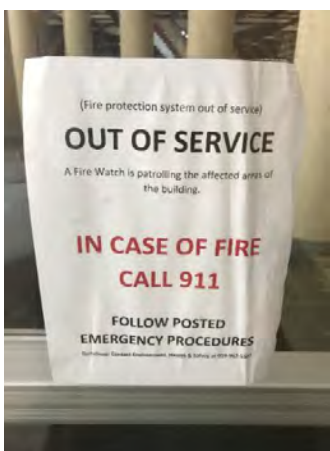
Throughout Phase 1 and 2 of the MBRB fire alarm system replacement a fire watch was implemented per the University's [Policy on Fire Protection System Impairments](#). A contractor (Rhino Sports and Entertainment Services, LLC) was hired to conduct the 24 hour / 7 days a week continuous fire watch for the building while the fire alarm replacement took place. An example of the required UNC-CH Fire Watch Log template is attached, as well as a copy of one day from the MBRB fire watch log pulled at random. The full MBRB fire watch log and contractor schedule are stored at EHS and can be provided by request.

In terms of notification of MBRB fire alarm system impairment to building occupants, several signs were placed throughout the building prior to Phase 1 and 2 beginning. All fire alarm pull stations in the building were marked as "Out of Service" (Picture 1). All exterior entrances to the building were marked to advise occupants of the fire alarm outage (Picture 2). Additionally, evacuation maps are permanently located in the service elevator lobby on every floor (Picture 3).

Picture 1:



Picture 2:



Picture 3:



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While the fire system was impaired during the replacement, sprinklers were still active and a continuous fire watch was in place. Building occupants were notified in various places throughout the building with clear signage that the fire protection system was out of service, a fire watch was in progress, and they should notify 911 in case of fire. An email notification to building occupants was not sent out as per normal protocol and we will ensure that this takes place in the future. On June 29, 2022, an email was sent to building occupants to update them on the fire system impairment and most up to date timeline (attached).

The University made best efforts to notify occupants and ensure their safety from the risks of fire during this important safety upgrade. If you have additional questions or concerns, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine R. Brennan", with a long horizontal line extending to the right.

Catherine Brennan
Executive Director
Department of Environment, Health and Safety
University of North Carolina at Chapel Hill
Office 919-843-5331
crbrennan@ehs.unc.edu

Cc:

Rob Kark, Assistant Dean, School of Medicine Planning Office
Kathleen Caron, Professor and Chair, Dept. of Cell Biology & Physiology, School of Medicine
Anna Wu, Associate Vice Chancellor, Facilities Services