

January 24, 2000

DENNIS M. BACA  
MANAGER, ENVIRONMENTAL MANAGEMENT POLICY

SUBJECT: Management Advisory Report - Asbestos  
Abatement at United States Postal Service  
Facilities (Report Number FA-MA-00-001)

This letter addresses concerns regarding the health and safety of Postal Service employees at facilities, where required, asbestos abatement may not have been performed. These concerns were discovered during an ongoing investigation of a telecommunications contractor.

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**Background**

The Office of Inspector General (OIG) was conducting an investigation of a telecommunications contractor. According to its contract, the general contractor was responsible for installing telecommunication wiring in approximately 8000 postal facilities nationwide. Due to the age of some of these postal facilities, asbestos abatement was necessary if asbestos-containing materials were disturbed during the installation of telecommunication wiring. The Postal Service identified 186 postal facilities that required asbestos abatement under this contract.

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**Objective, Scope, and Methodology**

The objective of our review was to determine if the contractor performed the asbestos abatement work that was required if asbestos-containing materials were disturbed during the installation of telecommunication wiring in postal facilities. During the review, we conducted interviews with the Postal Service Manager, Environmental Management Policy, headquarters officials, the prime contractor, and Postal Service telecommunications officials in Raleigh, North Carolina. We also made site visits to various postal facilities.

This review was conducted from October 1999 through January 2000, in accordance with the President's Council

on Integrity and Efficiency, Quality Standards for Inspections. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

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**Asbestos Abatement**

Between October 1998 and February 1999, the OIG and the Postal Service conducted inspections of several facilities and determined that in some instances the electrical subcontractors were paid for incomplete, defective or never-completed work. As of October 1999, the OIG and the Postal Service had identified several million dollars in improper billings for wire installations, which the contractor has agreed to remit to the Postal Service. Based upon this finding, the general contractor conducted additional compliance inspections, in October 1999, of several postal facilities and also determined that in some instances, asbestos abatement was never completed. As of November 1999, the investigation had disclosed that the Postal Service was invoiced and paid about \$869,000 for asbestos abatement at approximately 186 postal facilities.

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**Suggestions**

Based on our limited review, we suggest that the manager, Environmental Management Policy:

1. Obtain copies and assemble all pertinent environmental/asbestos (i.e. Site Surveys, PS 8210, Asbestos Disposal Verification forms, Waste Shipment forms, etc.) forms from the facilities for OIG review. (Each subcontractor was required to complete these forms before and/or after abatement.)
2. Designate Postal Service environmental coordinators or other competent personnel in the appropriate district offices to conduct inspections of each identified facility to verify and document if abatement was actually performed.
3. If the asbestos was not removed, determine if it was disturbed and assess if potential health or safety risks exist, and initiate corrective actions immediately.
4. Record all costs incurred by the Postal Service to complete the above requests.

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**Management's  
Comments**

The manager, Environmental Management Policy indicated agreement with our suggestions and stated that a memorandum to be signed by the vice presidents of Engineering and Human Resources would be sent to the area vice presidents detailing the actions to remedy the concerns raised by the OIG. On December 20, 1999, a memorandum addressed to the area vice president was signed requesting that each area vice president direct each district to conduct a visual surveillance of the condition of each facility that may have been impacted by the wiring installation by January 7, 2000. The memorandum also stated that If the surveillance indicates a potential hazard, the area vice presidents should take immediate steps to document and correct the conditions.

In addition, the memorandum instructed the area vice presidents to direct each district to assemble all pertinent environmental/asbestos surveys, PS 8210, Asbestos Disposal Verification forms for review. Further, the area vice presidents were to appoint an area point of contact to coordinate this effort and provide the names of the contacts to the asbestos program manager, Environmental Management Policy and to the Office of the Inspector General's Facilities Program Office. Finally, the area vice presidents were to record all costs incurred to complete the above suggestions. We have summarized management's comments and included the full text in the appendix.

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**Evaluation of  
Management's  
Comments**

Management's comments are responsive to our suggestions.

We appreciate the cooperation and courtesies provided by your staff during this review. If you have any questions, please contact Anthony T. Cannarella, director, Facilities Programs at (703) 248-2270 or me at (703) 248-2300.

*//Signed//*

Sylvia L. Owens  
Assistant Inspector General  
for Revenue Cost/Containment

cc: John R. Gunnels

## APPENDIX. MANAGEMENT'S COMMENTS

ENGINEERING



December 6, 1999

MS. OWENS

SUBJECT: Asbestos Abatement at Postal Facilities (Report Number FA-LA-00 – Draft)

In response to the recommendations contained in your November 23 memorandum and subsequent discussions between Michael Striglers, Anthony Cannarella, Paul Fennewald, and Frank Lundblad, the following actions are underway:

In a memorandum to be signed by Vice Presidents William Dowling and Yvonne Maguire, we are asking each Area Vice President to:

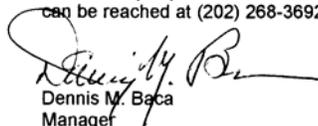
1. Direct each district to conduct, by January 7, 2000, a visual surveillance (as outlined in the Asbestos Management Guide, AS-556) of the condition of the ACBM in each facility listed. The visual surveillance will focus on the areas of the facility that may have been impacted by the wiring installation. Any changes noted will be documented and, if possible, indicate if they were as a result of the wiring installation. Any information obtained through discussions with on site personnel will be so documented. Provide the name, title, and phone number of the individual that performs the visual surveillance.
2. If the visual surveillance or other evidence indicates a potential hazard, take immediate steps within existing asbestos management procedures to document and correct the conditions. Provide information on the results of the visual surveillance and steps taken.
3. Instruct each district to assemble all available and pertinent asbestos management documentation for each facility listed, including asbestos surveys, PS Forms 8210, records of 6-month visual surveillance, statements of work, and hazardous waste manifests. (The District Asbestos Program Coordinator is the logical person to have access to most of this information.) Review the PS Form 1773, Report of Hazard Log, for any employee reports of asbestos disturbances. Provide the name of the individual that compiled the documentation.
4. Appoint an Area point of contact (POC) to coordinate this effort. Provide the names to Mike Striglers, Office of the Inspector General, 1735 North Lynn Street, Arlington, Virginia 22209-2020 and Paul Fennewald, Asbestos Program Manager, Environmental Management Policy, 475 L'Enfant Plaza, S.W., Room 1P830, Washington, D.C. 20260-2810.
5. Record all costs incurred by the Postal Service to complete the above actions.

475 L'ENFANT PLAZA SW  
WASHINGTON DC 20260-2810  
(202) 268-6188  
FAX: (202) 268-6012

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If the districts need additional information to complete the request, they have been notified to contact Michael at (703) 248-2338. Paul is available to assist with programmatic and policy questions. He can be reached at (202) 268-3692.



Dennis M. Baca  
Manager  
Environmental Management Policy

cc: Mr. Strigler



December 20, 1999

VICE PRESIDENTS, AREA OPERATIONS

SUBJECT: Office of Inspector General (OIG) Audit Request: Asbestos Management

The Postal Service has taken a leadership role in environmental compliance and employee safety and health, and the asbestos management program which has been implemented and deployed is a key element in that role. As part of an ongoing investigation of a telecommunications contractor, the OIG has raised concerns that performance of that contract may have resulted in improper disturbance or abatement of asbestos containing building materials (ACBM) in at least 168 postal facilities.

According to contract #102590-97-B-H013, the general contractor was responsible for installing telecommunications wiring in approximately 8,000 postal facilities nationwide (also known as the AOI deployment). In some facilities, ACBM were present and may have required OSHA approved work practices or abatement for installation of the wiring. The OIG has determined that the Postal Service was invoiced and paid a total of \$889,028 for asbestos abatement in the 168. Subsequent compliance inspections by the general contractor determined that in some facilities asbestos abatement was never completed.

Based on this information from an ongoing investigation, the OIG has requested documentation on asbestos management in these facilities, and that it be determined if any health hazards may have been created or remain as a result of the contractor activities. Enclosed is a list of the facilities supplied by the OIG. Fortunately, through deployment of area asbestos control plans and ongoing asbestos control efforts, the means are already in place to prevent disturbances of asbestos and quickly assemble the information requested by the OIG. Therefore, we request that you take the following steps to comply with the OIG request on or before January 31, 2000.

1. Direct each district to conduct, by January 7, 2000, a visual surveillance (as outlined in the Asbestos Management Guide, AS-556) of the condition of the ACBM in each facility listed. The visual surveillance must focus on the areas of the facility that may have been impacted by the wiring installation. Document any changes noted and, if possible, indicate if they were as a result of the wiring installation. Any information obtained through discussions with on site personnel must be so documented. Provide the name, title, and phone number of the individual that performs the visual surveillance.
2. If the visual surveillance or other evidence indicates a potential hazard, take immediate steps within existing asbestos management procedures to document and correct the conditions. Provide information on the results of the visual surveillance and steps taken.

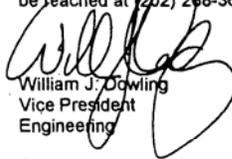
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WASHINGTON DC 20260

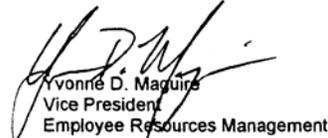
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3. Instruct each district to assemble all available and pertinent asbestos management documentation for each facility listed, including asbestos surveys, PS Forms 8210, records of six-month visual surveillance, statements of work, and hazardous waste manifests. (The district asbestos program coordinator is the logical person to have access to most of this information.) Also review the PS Form 1773, Report of Hazard Log, for any employee reports of asbestos disturbances. Provide the name of the individual that compiled the documentation.
4. Appoint an area point of contact (POC) to coordinate this effort. Please furnish this POC to Michael Striglers, Office of the Inspector General, 1735 North Lynn Street, Arlington, Virginia 22209-2020 as well as Paul Fennewald, Environmental Programs Analyst, Environmental Management Policy, 475 L'Enfant Plaza, S.W., Room 1P830, Washington, D.C. 20260-2810.
5. Record all costs incurred by the Postal Service to complete the actions above.

When all the records and documentation of actions noted above are assembled, please send the materials to Michael and Paul at the addresses above.

If the districts need additional information to complete the request, they should contact Michael at (703) 248-2336. Paul is available to assist with programmatic and policy questions. He can be reached at (202) 268-3692.

  
William J. Dowling  
Vice President  
Engineering

  
Avonne D. Maguire  
Vice President  
Employee Resources Management

Enclosure

cc: Ms. Owens  
Mr. Striglers  
Mr. Weirich  
AECCs  
Area Human Resource Analysts, Safety and Health

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**Major Contributors to  
the Report**

Michael Striglers  
Vladimir Filzow  
Henry Hoffman  
Anthony Cannarella