



OFFICE OF  
**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

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# **U.S. Postal Service's Health and Safety Program**

## **Audit Report**

November 14, 2011

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**Report Number HR-AR-12-001**



OFFICE OF  
**INSPECTOR  
GENERAL**  
UNITED STATES POSTAL SERVICE

# HIGHLIGHTS

November 14, 2011

## U.S. Postal Service's Health and Safety Program

Report Number HR-AR-12-001

### **IMPACT ON:**

The U.S. Postal Service's Health and Safety Program and Postal Service employees.

### **WHY THE OIG DID THE AUDIT:**

Our objective was to assess whether the Postal Service has processes in place to minimize health and safety hazards at its facilities and ensure compliance with Occupational Safety and Health Administration (OSHA) regulations.

### **WHAT THE OIG FOUND:**

The Postal Service has processes to minimize health and safety hazards and assist with OSHA compliance. However, employees did not always follow these processes, as we identified hazards and unsafe conditions at locations we visited. We also identified opportunities to improve safety processes and procedures. We identified the following safety hazards due to management control weaknesses including: safety was not always a priority; there were inconsistent policies and insufficient monitoring of preventive maintenance procedures; and there was insufficient oversight to ensure standard operating procedures (SOPs) were followed and safety hazards were abated. Postal Service policy states managers must demonstrate a commitment to maintain a safe and healthy work environment

and be held accountable for safety and compliance with OSHA regulations.

### **WHAT THE OIG RECOMMENDED:**

We recommended the vice president, Employee Resource Management, review and revise supervisor performance measures to place a higher priority on safety and update the Safety Toolkit regarding Powered Industrial Truck operation training. We also recommended the vice presidents, Area Operations, ensure plant managers establish and implement SOPs for dock operations and management controls regarding safety procedures.

### **WHAT MANAGEMENT SAID:**

Management generally agreed with the findings and recommendations. Some area vice presidents only agreed in part with specific safety hazards identified; but, overall, they agreed with the recommendations and have implemented or plan to implement corrective actions.

### **AUDITORS' COMMENTS:**

Management's comments were responsive and we believe the corrective actions should resolve the issues identified in the report.

[Link to review the entire report](#)

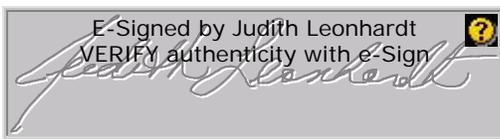


November 14, 2011

**MEMORANDUM FOR:** DEBORAH M. GIANNONI-JACKSON  
VICE-PRESIDENT, EMPLOYEE RESOURCE  
MANAGEMENT

VICE PRESIDENTS, AREA OPERATIONS

E-Signed by Judith Leonhardt  
VERIFY authenticity with e-Sign



The signature block contains a handwritten signature in cursive that reads "Judith Leonhardt". To the right of the signature is a small yellow icon with a question mark, likely representing a verification or security feature.

**FROM:** Judith Leonhardt  
Acting Deputy Assistant Inspector General  
for Support Operations

**SUBJECT:** Audit Report – U.S. Postal Service’s Health and Safety  
Program (Report Number HR-AR-12-001)

This report presents the results of our audit of the U.S. Postal Service’s health and safety program (Project Number 11YG019HR000).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Andrea Deadwyler, director, Human Resources and Security, or me at 703-248-2100.

Attachments

cc: Anthony J. Vegliante  
Corporate Audit and Response Management

**TABLE OF CONTENTS**

Introduction ..... 1

Conclusion ..... 1

Maintaining a Safe Working Environment ..... 2

    Loading Dock Safety ..... 2

    PIT Operation Procedures ..... 4

    Emergency Eyewash and Shower Units ..... 4

    Other Safety Concerns ..... 6

Opportunities to Improve Safety Procedures ..... 8

    PS Form 1767, Report of Hazard, Unsafe Condition or Practice Procedures ..... 8

    OSHA Complaints ..... 9

    Semiannual Inspections ..... 10

Recommendations ..... 10

Management’s Comments ..... 11

Evaluation of Management’s Comments ..... 13

Appendix A: Additional Information ..... 15

    Background ..... 15

    Objective, Scope, and Methodology ..... 16

    Prior Audit Coverage ..... 18

Appendix B: Hazards Identified by Location ..... 20

Appendix C: Management’s Comments ..... 21

## Introduction

This report presents the results of our audit of the U. S. Postal Service's health and safety program (Project Number 11YG019HR000). Our objective was to assess whether the Postal Service has processes in place to minimize health and safety hazards at its facilities and ensure compliance with Occupational Safety and Health Administration (OSHA) regulations. This audit was self-initiated and addresses operational risk (see [Appendix A](#) for additional information about this audit).

In 1998, the Postal Employees Safety Enhancement Act (PESEA) changed the status of the Postal Service as an employer under the Occupational Safety and Health (OSH) Act of 1970. Previously, the Postal Service, as a federal agency, was exempt from private sector provisions of the OSH Act.<sup>1</sup> When PESEA became effective, the Postal Service became fully subject to the OSH Act. This gave OSHA jurisdiction over the Postal Service in matters relating to employee safety and health and required the Postal Service to comply with OSHA standards and regulations. If violations occur, OSHA may cite<sup>2</sup> or fine the Postal Service or, in extreme cases, refer the agency for criminal prosecution.

In recent years, OSHA has increased its inspections and citations of the Postal Service considerably and, as a result, penalties have increased. Specifically, the total number of proposed violations increased from 112 in fiscal year (FY) 2008 to 528 in FY 2010. According to OSHA, 52 percent of the Postal Service's proposed violations in FYs 2008-2010 were for serious violations. Actual penalties the Postal Service paid increased from \$59,965 in FY 2008 to \$568,486 in FY 2010.

## Conclusion

The Postal Service has implemented processes to minimize health and safety hazards at its facilities and to help ensure compliance with OSHA requirements, including semiannual safety inspections that provide a method for identifying, tracking, and abating hazards and unsafe conditions. They also perform program evaluations to measure the effectiveness of safety and health programs and ensure compliance with OSHA regulations. In addition, the employees use Postal Service (PS) Form 1767, Report of Hazard, Unsafe Condition or Practice Procedures, to report safety hazards they identify in the work place. However, Postal Service personnel at the locations we visited did not consistently follow established procedures, resulting in hazardous and unsafe working conditions. Some of the hazards we observed included unsafe practices regarding loading dock areas, powered industrial truck (PIT) operation, eyewash and shower units, electrical issues, unanchored lockers, and fire prevention. These conditions occurred due to internal and management control weaknesses including:

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<sup>1</sup> Federal agencies are covered under Section 19 of the OSH Act and Executive Order 12196, *Occupational Safety and Health Programs for Federal Employees*, February 26, 1980.

<sup>2</sup> OSHA can issue a citation when it determines a violation has occurred. Citations can be issued with or without an accompanying fine.

safety not always being considered a priority, insufficient monitoring of preventive maintenance procedures, and insufficient oversight to ensure that standard operating procedures (SOPs) were followed and that safety hazards were abated. As a result, employees are exposed to increased risk of injury and the Postal Service could be subject to increased workers’ compensation costs and OSHA penalties. The Postal Service could also be subject to potential negative publicity that could impact its brand. We also identified opportunities for the Postal Service to improve safety procedures, such as those related to handling employee-reported hazards and semiannual inspections.

### Maintaining a Safe Working Environment

At the eight judgmentally selected locations we visited during the audit, Postal Service officials did not consistently maintain an environment free of hazards and unsafe working conditions. For example, we identified safety hazards regarding loading docks; PIT operation; eyewash and shower units; exposed electrical wiring; extension cords used in lieu of permanent wiring; missing outlet covers; broken switches; cabinets, bookcases, and lockers not anchored; and fire extinguishers blocked by equipment. See Table 1 for safety issues identified by location, and also see [Appendix B](#) for additional information about hazards identified by location.

**Table 1. Safety Issues Identified**

Hazard Category								
Dock Issues	No	No	No	Yes	No	No	Yes	No
Powered Industrial Truck	Yes	No	Yes	Yes	Yes	No	Yes	No
Eyewash and Shower Units	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Electrical	Yes	Yes	Yes	Yes	Yes	Yes	No	No
Unanchored Lockers	No	Yes	Yes	No	No	Yes	No	No
Fire Prevention	Yes	Yes	Yes	No	No	Yes	No	No

### Loading Dock Safety

At two processing & distribution centers (P&DCs) ( ), we identified issues on the docks where mail was loaded and unloaded. For example:

<sup>3</sup> A central mail facility that processes and dispatches part or all both incoming mail and outgoing mail for a designated service area. It also provides instructions on the preparation of collection mail, dispatch schedules, and sorting plan requirements to mailers.

<sup>4</sup> A highly mechanized mail processing plant that distributes Standard Mail® and Package Services in piece and bulk form.

- At the [REDACTED] P&DC, we identified safety concerns related to truck loading procedures. The facility uses a red and green dock lighting system to indicate when it is safe for a driver to back the trailer into a bay and when it is safe for dock personnel to enter the trailer. Many dock lights were not working, and some were not illuminated. In addition, some were the wrong color (green when they should have been red or vice versa). We also noted that trucks were being loaded and unloaded regardless of the color of the light, although signs by each door stated, "Enter On Green Only.". Management was unable to provide us with SOPs for receiving and dispatching vehicles. However, a new SOP was implemented after our site visit. See Figure 1 for an example of a dock light that was not working.

**Figure 1.** Inoperative Dock Lights – [REDACTED]



Source: OIG

- The [REDACTED] P&DC was experiencing recurring accidents on the inbound and outbound docks and platforms. At least 10 incidents have occurred since June 2010, and six of those occurred after the facility implemented a revised SOP for receiving and dispatching vehicles in August 2010. For example:
  - On January 21, 2011, an employee was loading a truck when the driver drove off with the employee still in the trailer.
  - On April 26, 2011, an employee was injured when the driver moved the truck he was loading.

Headquarters' Surface Operations issued guidelines for the receipt and dispatch of motor vehicles to prevent accidents generally caused by the unauthorized movement of vehicles away from the dock before completion of loading and unloading. However, because of variations in dock operations, facility configurations, and other site-specific issues, each facility is required to have its own SOP. Although the [REDACTED] P&DC issued a SOP on August 2010, we still identified safety concerns at that location.

## PIT Operation Procedures

We identified safety concerns related to PIT operation and training at four of eight locations. Specifically:

- While on-site at the [REDACTED] P&DC, auditors were nearly hit by a PIT. The driver exceeded the 5 mile per hour speed limit and did not sound the horn when passing pedestrians.
- At three locations ([REDACTED] P&DCs), we observed PIT operators driving without wearing seat belts.
- [REDACTED] P&DC, six PIT operators did not receive the required triennial training.
- At two locations, (the [REDACTED] P&DCs) supervisors responsible for PIT operators had not been trained in PIT operation as required.<sup>6</sup>

## Emergency Eyewash and Shower Units

Postal Service policy requires emergency eyewash and shower units to be accessible through an unobstructed path that allows employees to reach the units within 10 seconds, that they be tested weekly, and that the location does not pose harm to the user.<sup>7</sup> At seven of the eight locations we visited, we noted problems with the eyewash or shower units (see [Table 1](#)). For example:

- The [REDACTED] P&DC had five eyewash/emergency shower units and one portable eyewash unit. All six were in locked rooms, preventing easy access. In addition, one of the rooms had a pole at the entrance, making it difficult to enter.<sup>8</sup>
- The [REDACTED] P&DC had one permanent eyewash and shower unit and one portable eyewash unit. The portable eyewash unit was in a small room and buried under a pile of boxes. It had not been inspected since June 27, 2010, and the fluid had not been changed. According to the maintenance manager, the fluid should be changed weekly (see [Figure 2](#)).

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<sup>5</sup> Postal Service policy as specified in the Safety Toolkit requires a minimum of 4 hours of triennial training for PIT operators. OSHA policy states that an evaluation of each PIT operator's performance shall be conducted every 3 years. Management stated that they follow OSHA's policy and are going to revise Safety Toolkit policies to match OSHA requirements.

<sup>6</sup> The Safety Toolkit states "installation heads responsible for supervising PIT operators must have the same level of skill set as the PIT operator they are supervising."

<sup>7</sup> *Emergency Eyewash-Shower Guide V2* (from the Safety Toolkit).

<sup>8</sup> While on-site the safety specialist and maintenance manager agreed that these rooms should not be locked. Also, during the exit conference at the facility, the plant manager instructed the maintenance manager to keep all six rooms unlocked and to remove the pole. However, in subsequent correspondence from Postal Service management, they stated that three of the rooms (the spill, oil, and battery rooms) should be locked to prevent unauthorized entry. They also stated that the pole near the entrance of one room is there to protect employees who walk directly into a main aisle and that the door can be opened and is not blocked. Management also acknowledged that some of the eyewash units they have were purchased unnecessarily.

**Figure 2.** Blocked Eyewash Unit, [REDACTED] P&DC



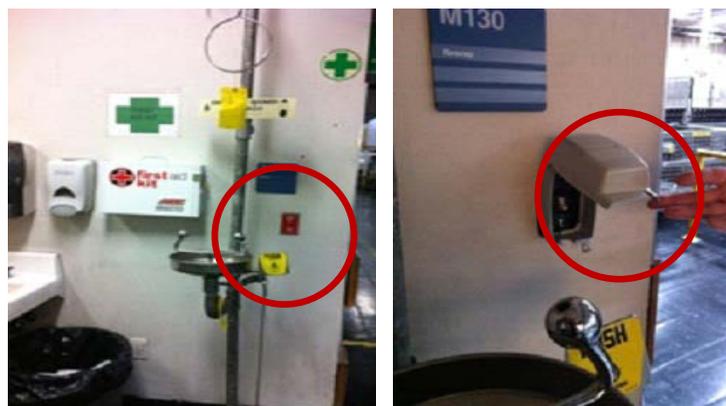
Source: OIG

- At the [REDACTED] P&DC, we found a broken eyewash unit and two eyewash units that were not inspected weekly, as required. One eyewash unit was last inspected in June 2010 and the other in December 2010. In addition, two showers were located next to a light switch, which posed the risk of electrical shock. Maintenance personnel installed a waterproof cover over the light switch during our visit. The picture on the left in Figure 3 shows the switch before it was fixed and the picture on the right shows the light switch after the hazard was abated.

**Figure 3.**

Safety Shower Near Light Switch, [REDACTED] P&DC

Safety Shower Near Light Switch, After the Hazard was Abated



Source: OIG

- The [REDACTED] P&DC had a shower directly next to a hot water heater, also posing the risk of electrical shock. Maintenance personnel at the facility had initiated plans to abate the hazard through the installation of a plastic panel to prevent water from hitting the hot water heater.

### Other Safety Concerns

We also observed exposed electrical wiring; extension cords used in lieu of permanent wiring; missing outlet covers; broken switches; cabinets, bookcases, and lockers not anchored; and fire extinguishers blocked by equipment (see Figure 4).

**Figure 4.**

Extension Cord Used in Lieu of Permanent Wiring,  
[REDACTED] P&DC



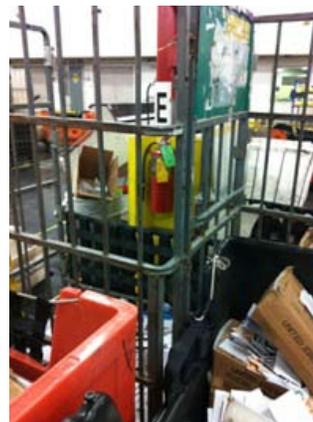
Unanchored Locker,  
[REDACTED] P&DC



Blocked Dock Ramp,  
[REDACTED] P&DC



Blocked Fire Extinguisher,  
[REDACTED] P&DC



Exposed Electrical Wires,  
[REDACTED]

Source: OIG

Extension Cord Used in Lieu of  
Permanent Wiring, [REDACTED]

We found management control weaknesses at the locations we visited contributed to the safety hazards identified. Specifically:

- Officials at two locations stated safety was not a priority.
- Performance measures for supervisors did not place a high priority on maintaining a safe and healthy work environment.<sup>9</sup>
- Guidance regarding PIT operation safety training is inconsistent. Headquarters management stated that OSHA does not require PIT operation training for operators and supervisors. However, the Safety Toolkit identified PIT operation training courses as a triennial requirement. The OSHA requirement is for an evaluation of PIT operator performance every 3 years.
- Field management officials we interviewed:
  - Were not aware of hazardous conditions (four locations).
  - Did not always ensure preventive maintenance was performed on eyewash and shower units (two locations).
  - Did not always ensure personnel followed policies and procedures regarding loading dock safety (two locations).
  - Did not always ensure personnel followed policies and procedures regarding PIT operation (five locations).

<sup>9</sup> Supervisors have a performance measure for OSHA injury and illness rates, which accounts for 10 percent of their corporate goal which accounts for 50 percent of the supervisor's overall measures. As a result, the OSHA injury and illness goal represents approximately 5 percent of the total rating.

As a result, employees were exposed to increased risk of injury and the Postal Service was exposed to potential increases in workers' compensation costs and OSHA penalties.

### Opportunities to Improve Safety Procedures

We identified opportunities for the Postal Service to improve established safety procedures. The Postal Service has implemented processes to minimize health and safety hazards at its facilities and to help ensure compliance with OSHA requirements, including semiannual safety inspections which provide a method for identifying, tracking, and abating hazards and unsafe conditions. They also perform health and safety program evaluations to measure the effectiveness of safety and health programs and ensure compliance with OSHA regulations. In addition, the employees use PS Form 1767 to report safety hazards they identify in the work place. However, we noted the following issues at the sites visited during our audit:

#### PS Form 1767, Report of Hazard, Unsafe Condition or Practice Procedures

Employees use PS Form 1767 to report safety hazards they identify in the workplace. We reviewed the Safety Toolkit database<sup>10</sup> for the locations included in our audit and found that employees did not always enter a PS Form 1767 in the Safety Toolkit as required (see Table 2).

**Table 2 - PS Form 1767 Data by Location**

Location	Total PS Forms 1767 2009-2011	Total Entered in Toolkit	Total Not Entered in Toolkit	Percentage Not Entered in Toolkit
██████████	122	118	4	3%
██████████	119	114	5	4
██████████	167	131	36	22
██████████	210	199	11	5
██████████	102	85	17	17
██████████	348	342	6	2
██████████	660	305	355	54
██████████	177	177	0	0
<b>Totals</b>	<b>1,905</b>	<b>1,471</b>	<b>434</b>	<b>23%</b>

<sup>10</sup> The Safety Toolkit is a Postal Service application used to prepare and manage accident reduction and hazard abatement plans; record and upload safety inspection findings for abatement tracking; and manage OSHA citations and employee hazard report logs.

At the [REDACTED] P&DCs, employees filed seven grievances because PS Forms 1767 were not addressed or the employee never received a response from management. At the [REDACTED] P&DC, supervisors signed off on nine hazards, stating they would be referred to maintenance but no follow up occurred. In addition, five forms at the [REDACTED] P&DC were not properly completed. The supervisor did not indicate on the forms actions taken to abate the hazards and the approving official did not certify on the forms that the hazards were abated. Therefore, we were unable to determine whether the alleged hazards were abated and the employee notified. We interviewed safety specialists who stated that they did not consider entering PS Form 1767 data in the Safety Toolkit to be a high priority. In addition, supervisors did not always follow proper procedures for abating hazards and forwarding the completed forms to safety specialists. If potential hazards are not promptly investigated and abated, employees are exposed to increased risk of injury.

### OSHA Complaints

We also identified instances where employee concerns resulted in OSHA complaints, because the employee complaints were not abated. For example:

- At the [REDACTED] P&DC, an employee submitted a safety hazard regarding ventilation in the battery room on a PS Form 1767 on December 1, 2010. On December 21, 2010, a complaint regarding the same issue was filed with OSHA, because the issue was not adequately addressed at the facility.
- At the [REDACTED] P&DC, employees submitted PS Forms 1767 in February and March 2010 complaining about unsafe driving practices by PIT operators. Management stated they took steps to abate this issue including holding safety talks and installing speed limiters on PIT equipment. However, on May 18, 2010, an OSHA complaint was filed stating that PIT operators were not following speed limits and were not honking their horns when required.

These conditions occurred, because according to safety officials at two of the locations we visited, safety was not a priority. As a result, managers did not promptly investigate alleged hazards and unsafe conditions or practices nor did they enforce safety procedures.

Postal Service policy states that PS Form 1767 provides a channel of communication between employees and management that promotes a prompt analysis and response with corrective action to reports of alleged hazards, unsafe conditions, or practice.<sup>11</sup> According to policy, supervisors are required to:

- Promptly investigate alleged hazards and unsafe conditions or practices.
- Respond to the employee who reported the hazard.
- Resolve the hazard, unsafe condition, or practice, if possible.
- Complete a work order to have corrective action taken.

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<sup>11</sup> *Employee and Labor Relations Manual (ELM)*, Section 824.61, dated May 2011.

- Follow up to see that the hazard, unsafe condition, or practice was corrected.
- Notify the employee of the results.<sup>12</sup>

### Semiannual Inspections

Semiannual inspections were conducted at all the sites we visited. However, we identified safety hazards in the semiannual inspections that were listed as "abated" at four sites (████████████████████ P&DCs), but they were not. For example, at the ██████████ P&DC, an inspection item was entered on March 15, 2011, because five garage doors on the docks were not operating properly. During our site visit on June 22, 2011, we noted that three of the same doors were inoperable.

Officials did not always list the locations and sub-locations for hazards identified in semiannual inspections, making it difficult to identify and abate the deficiencies. In addition, multiple hazards were grouped into one finding, making analysis of a facility's condition (hazard category and frequency) inaccurate.

Safety personnel perform safety and health inspections to identify specific operational, facility, or program deficiencies that may cause accidents, injuries, and illnesses; and to foster compliance with OSHA regulations and standards.<sup>13</sup> Plant safety personnel must conduct semiannual inspections of all installations with 100 or more work years in the regular workforce and enter their findings into the Safety Toolkit. The *Employee and Labor Relations Manual* (ELM) requires procedures for correcting deficiencies to include a process for checking whether the corrective action taken was effective.<sup>14</sup> The checklist used to conduct the inspection is available in the Safety Toolkit. However, Postal Service policy does not provide clear guidelines for reporting hazards in the semiannual inspections. When safety procedures are not followed and identified hazards are not appropriately abated, employees are exposed to increased risk of injury and the Postal Service could be subjected to increased costs and negative publicity that could impact the Postal Service brand.

### Recommendations

We recommend the vice president, Employee Resource Management:

1. Review and revise, as appropriate, supervisor performance measures to place a higher priority on maintaining a safe and healthy work environment; for example: performance measures could be linked to the number of abated and/or unabated safety hazards.
2. Update policies in the Safety Toolkit regarding training requirements for Powered Industrial Truck operation to ensure they are consistent with Occupational Safety and Health Administration requirements.

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<sup>12</sup> Handbook EL-801, *Supervisor's Safety Handbook*, Section 1-5, updated with *Postal Bulletin* revisions through October 23, 2008.

<sup>13</sup> ELM, Section 824.1.

<sup>14</sup> ELM, Section 824.54.

3. Distribute all policy updates and revisions to field managers and supervisors to help ensure consistent implementation of Postal Service and Occupational Safety and Health Administration requirements.

We recommend the vice presidents, Area Operations implement management controls to ensure field management officials:

4. Establish and implement standard operating procedures for dock operations.
5. Perform and oversee preventive maintenance procedures for eyewash and shower units.
6. Conduct required safety inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for the employees.
7. Enter Postal Service Forms 1767, Report of Hazard, Unsafe Condition or Practice Procedures, accurately and timely in the Safety Toolkit.

### Management's Comments

Management generally agreed with the recommendations; however, Great Lakes and Southwest area management stated they disagreed that safety was not a priority. Great Lakes management stated they go above and beyond to involve employees in accident reduction efforts, inspection activities, and abatement of deficiencies, and that they are one of only two areas to have implemented Joint Safety Taskforce committees at each of their districts. Southwest Area management stated they have demonstrated safety as a priority by involving more facilities than any other area in the Voluntary Protection Program certification process. They further stated they lead the Postal Service with the lowest OSHA II rate and Motor Vehicle Accident rate.

Employee Resource Management responded to recommendations 1, 2, and 3 as follows: With regard to recommendation 1, management stated in FY 2012 (effective October 1, 2011), the Program Evaluation Guide score will be a compensable indicator on the National Performance Assessment scorecard for: district managers; Postal Career Executive Service (PCES) Post Office managers and Executive and Administrative Service (EAS) staff; PCES Plant managers and EAS staff; processing and distribution centers EAS staff; and level 21 to 26 Post Office EAS staff. Regarding recommendation 2, management stated the safety training matrix for PIT training was updated on September 19, 2011, to remove the reference to triennial training requirements for PIT operators; and that OSHA requires triennial performance evaluations for PIT operators, and retraining is required only when the evaluation reveals that the operator is not operating the PIT safely. In response to recommendation 3, management stated the Safety Resources webpage that has been used to disseminate policy information to the field for many years has been replaced by a new webpage, *Resources for Safety and OSHA Compliance* (effective September 30, 2011) which has several features that will make policy updates and revisions more visible.

Recommendations 4, 5, 6, and 7 were addressed to the vice presidents, Area Operations, and they responded as follows:

Regarding recommendation 4, management generally stated they follow the guidelines listed in the headquarters SOP for Receiving and Dispatching Vehicles, dated November 7, 2007. In addition, Western and Pacific area management stated they will reinforce the existing SOP, while Capital Metro Area management stated they agreed in part with the recommendation, and that there were no dock issues at ██████ P&DC. They further stated they will reissue SOPs to operational managers to ensure compliance. Great Lakes Area management stated they met with the Leadership Team on October 20, 2011, and gave a presentation on the types of deficiencies found in their dock operations and again instructed them to ensure that they follow all rules and regulations. On October 15, 2011, Northeast Area management initiated a safety talk program that will provide refresher training to the drivers and the mail handlers on a quarterly basis, and Southwest Area management stated no dock issues were identified, but their continued commitment to safety will be maintained. Lastly, no identified dock safety issues were identified in the Eastern Area, and they did not comment on recommendation 4.

In response to recommendation 5, Western Area management stated they believed adequate policies and tools are in place to address preventive maintenance on eyewash and shower units. However, Western and Pacific Area management stated they will reinforce the importance of existing preventive maintenance procedures for eyewash and safety shower units, during their scheduled maintenance teleconferences. Capital Metro Area management agreed in part with the recommendation, stating there were no specific references to the ██████ P&DC in the report, but Appendix B indicated the only eyewash and shower unit was locked in the Hazmat room. As a result of the U.S. Postal Service Office of Inspector General (OIG) recommendations, Capital Metro Area management installed six additional eyewash units on June 1, 2011. The Great Lakes and Southwest Area management stated they abated eyewash and safety shower hazard during the OIG site visits. Northeast Area management stated the report identifies eyewash and shower units as a safety hazard but does not specify what the concern is. They further stated the Hazmat area eyewash station is kept locked to keep unauthorized personnel out, and it is available to those who work in that room; and that there are other eyewash units on the workroom floor that are not in a locked room, that are accessible to employees. There were no issues specific to the Eastern Area regarding eyewash units; therefore, they did not comment on this recommendation.

Regarding recommendation 6, Western Area management stated safety personnel will conduct quarterly reviews on safety and health inspection issues. The findings will be discussed and reviewed during safety teleconferences with district safety managers. Pacific Area management stated they will reinforce the importance of existing preventative maintenance procedures for eyewash and shower units during a scheduled maintenance teleconference. Great Lakes management provided supplemental correspondence stating they instructed the safety analyst to review the unabated items

in the Safety Toolkit on a biweekly basis and contact installation heads and district safety managers to get these items abated. Northeast Area management stated the ██████ P&DC FY 2011 Safety Inspection has been completed and entered into the Safety Toolkit within the required time frame. An item that was listed as being abated but was not abated was the emergency action plan and will be updated and posted no later than October 31, 2011; Southwest Area management stated the districts will be reminded of this requirement through the safety program policy letter that will be issued annually by the area leadership. Capital Metro Area management stated inspections and abatements are tracked by the area and district safety office weekly and all Capital Metro Area inspections were completed on September 30, 2011. The Eastern Area stated the safety hazards identified by the OIG were abated immediately. In addition, the facility manager, in conjunction with the facility safety specialist and district safety department, will conduct required safety and health inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for employees.

Lastly, in response to recommendation 7, Western Area management stated the Safety Office will conduct quarterly reviews on PS Form 1767, using the Program Evaluation Guide 2.0 Scores by Facility report. Capital Metro Area management stated they implemented a process to address the PS Form 1767 complaints in October 2011; and Pacific Area management will reinforce with each plant supervisor the procedures for promptly abating PS Forms 1767 by December 31, 2011. Great Lakes management stated that on October 6, 2011, the safety manager instructed her staff to check the PS Form 1767 file and enter the information on a frequent basis, at least once every 7 days. Eastern Area management stated that all PS Form 1767s submitted by employees, were entered in the Safety Toolkit; and Southwest Area management stated the area safety manager will send a letter to all districts to ensure compliance with policies related to hazards reported on PS Forms 1767 by October 2012. The Northeast Area management stated, beginning in September 2011, all PS Forms 1767 will be reviewed and discussed at the turnover meeting and will be given to the safety specialist each day to input into the Safety Toolkit.

See [Appendix C](#) for management's comments, in their entirety.

### **Evaluation of Management's Comments**

The OIG considers management's comments responsive to the recommendations and the corrective should resolve the issues identified in the report. With regard to management's disagreement with the statement in the report that safety was not always a priority, we acknowledge that some facilities included in our audit implemented safety processes and procedures. However, when we interviewed individuals responsible for safety, some stated safety related duties were not always a priority as one of the reasons established processes and procedures were not followed.

The OIG considers all the recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when

corrective actions are completed. These recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

## Appendix A: Additional Information

### Background

The OSH Act of 1970, administered by OSHA, established, for the first time, a nationwide federal program to protect workers from job-related death, injury, and illness. Under the OSH Act, employers are responsible for providing safe and healthy workplaces for their employees. OSHA's role is to ensure these conditions by setting and enforcing standards and providing training, education, and assistance. Covered employers comply with the safety and health standards and regulations and have a general duty to provide their employees with a workplace free from recognized serious hazards. OSHA provides enforcement through workplace inspections and investigations, which can result in penalties to employers.

Prior to 1998, when the PESEA was passed, the Postal Service was exempt from the private sector provisions of the OSH Act. OSHA now has jurisdiction over the Postal Service in matters relating to employee safety and health, and the Postal Service must comply with OSHA standards and regulations. Otherwise, like the private sector, the Postal Service can be cited, fined, and, in extreme cases, referred for criminal prosecution by OSHA if it is found to be in violation of the OSH Act.<sup>15</sup>

Over the last 3 fiscal years, OSHA's inspections and citations to the Postal Service have increased considerably. The total number of proposed violations increased from 112 in FY 2008 to 528 in FY 2010 (see Table 3 for OSHA enforcement statistics for FYs 2008 to 2010).<sup>16</sup>

**Table 3. OSHA Enforcement Statistics<sup>17</sup>**

Fiscal Year	Total Inspections	Inspections with Proposed Citations		Proposed Violations <sup>18</sup>				
		Proposed Citations	Proposed Penalties	Other	Repeat	Serious	Willful	Total
2008	176	59	\$119,360	51	2	59	0	112
2009	185	81	537,011	81	16	108	0	205
2010	304	165	6,615,708	143	33	272	80	528
<b>Total</b>	<b>665</b>	<b>305</b>	<b>\$7,272,079</b>	<b>275</b>	<b>51</b>	<b>439</b>	<b>80</b>	<b>845</b>

<sup>15</sup> Fines for willful or repeated violations can range from \$5,000 to \$70,000 for each violation and each serious violation may result in a penalty up to \$7,000.

<sup>16</sup> Data obtained from *Compliance with Occupational Safety and Health Administration Recordkeeping Requirements* (Report Number HR-AR-11-004 dated May 27, 2011).

<sup>17</sup> The Postal Service may contest the citation, proposed penalty, and/or abatement date. These numbers do not reflect contested items that have resulted in reductions in the violation's severity, number, or penalty amount.

<sup>18</sup> Serious violations are those where a substantial probability that death or serious physical harm could result. Willful violations are those in which an employer intentionally allows a violation to continue to exist. Other violations are for hazardous conditions that cannot reasonably be predicted to cause death or serious physical harm to exposed employees but do have a direct and immediate relationship to their safety and health.

Objective, Scope, and Methodology

Our objective was to assess whether the Postal Service has processes in place to minimize health and safety hazards at its facilities and ensure compliance with OSHA regulations. To accomplish our objective, we:

- Randomly selected 40 P&DCs from a universe of 260 and 10 NDCs from a universe of 21. We then judgmentally selected six P&DCs and two NDCs from our random sample for review. We selected the eight facilities, because of the high number of 1,767 complaints in the Safety Toolkit, unabated complaints, unabated semiannual inspections items, and the number of violations identified in recent inspections.
- For each facility included in our audit, we interviewed Postal Service officials, toured the facility, and validated information we obtained from the Safety Toolkit (see Table 4 for the facilities we visited).

**Table 4. Facilities Visited**

Area	District	Name	City, State
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

- Compared hard copies of PS Forms 1767 maintained at the facilities to the information documented in the Hazard Log in the Safety Toolkit to determine whether officials recorded all hazards reported by employees.
- Selected a judgmental sample of reported hazards for FY 2011 from the Hazard Log and the most recent semiannual and annual inspection reports in the Safety Toolkit. We used those documents when touring the facilities to verify whether management abated the reported hazards.
- We interviewed employees, including union officials, to determine whether they had any health and safety concerns that had not been addressed. In addition, we interviewed officials to determine what processes had been implemented to reduce health and safety risks and to ensure compliance with OSHA regulations.
- We reviewed correspondence pertaining to OSHA violations and complaints to determine whether they were similar to issues employees previously reported using

the PS Form 1767 process. Also, we reviewed grievances pertaining to health and safety and determined whether management resolved the issues.

- We toured the facilities and documented general safety concerns. In some instances, we photographed examples of safety hazards.
- We reviewed Handbook EL-80, *Supervisor's Safety Handbook* and the ELM to determine the Postal Service's responsibilities related to OSHA regulations.

We conducted this performance audit from February through November 2011 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 1, 2011, and included their comments where appropriate.

We tested the reliability of the data obtained from the Safety Toolkit<sup>19</sup> through interviews with Postal Service officials knowledgeable about the data. We also compared hard copy OSHA correspondence and internally generated health and safety documentation (such as PS Form 1767) to information in the Safety Toolkit. As a result, we determined the data were sufficiently reliable for the purposes of our audit.

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<sup>19</sup> The Safety Toolkit is an interactive management tool Postal Service officials use to manage the health and safety program.

Prior Audit Coverage

The OIG identified four audits related to our objective that were issued within the last several years:

Report Title	Report Number	Final Report Date	Monetary Impact	Report Results
<i>Compliance with Occupational Safety and Health Administration Recordkeeping Requirements</i>	HR-AR-11-004	5/27/2011	None	The Postal Service did not always record and report injuries and illnesses in accordance with OSHA requirements. Inaccurate and incomplete OSHA recordkeeping could impact management's ability to identify and correct hazardous conditions and mitigate future risks and result in OSHA citations with significant penalties to the Postal Service. Management generally agreed with our findings and recommendations but stated they believe the Postal Service has adequate policies and procedures for reporting OSHA injuries. In addition, management indicated they were already taking proactive measures to improve OSHA recordkeeping. The targeted implementation date is 9/30/2011.
<i>Powered Industrial Vehicle Management System at the Washington Network Distribution Center</i>	NO-AR-09-010	9/22/2009	None	Internal controls over vehicle safety, security, and inventory were not in place because management did not implement compensating internal controls when the Powered Industrial Vehicle Management System was no longer functioning. For example, equipment operators did not complete OSHA safety checklists as required, resulting in management not identifying unsafe vehicles. Management agreed with our recommendation to provide closer supervision and improve internal controls over powered industrial vehicles.

<p><i>Workplace Safety and Injury Reduction Goals in Selected Capitol Metro Area Facilities</i></p>	<p><a href="#">HM-AR-09-001</a></p>	<p>02/27/2009</p>	<p>\$63,200</p>	<p>The report found four mail processing facilities in the Capital Metro Area achieved some of their FYs 2007 and 2008 injury reduction goals; however, the achievements for three facilities were overstated, while the achievements for one facility were understated. We made recommendations regarding overstated injury reduction goals and the correction of safety deficiencies. Management agreed to all 10 recommendations but disagreed with several of the findings in the report, as well as the monetary impact of \$63,200.</p>
<p><i>Postal Service's Workplace Safety and Workplace-Related Injury Reduction Goals and Progress</i></p>	<p><a href="#">HM-AR-07-002</a></p>	<p>5/16/2007</p>	<p>None</p>	<p>The Postal Service exceeded its OSHA illness and injury reduction goals for FYs 2005 and 2006 and there may have been a corresponding reduction in the Postal Service's total accident and OSHA illness and injury costs. However, the Postal Service did not capture individual accident costs; therefore, we could not determine the cost savings in key categories from one year to the next. Management agreed with our recommendation to closely monitor conversion to the Systems Applications and Processes Environment Health and Safety module and to ensure the upgraded system captures key costs by facility, district/performance cluster, and area.</p>

Appendix B: Hazards Identified by Location

Hazard Category								
<b>Dock Issues</b>				No SOP, dock lights not working.				Numerous incidents in dock area resulting in several accidents
<b>Powered Industrial Trucks</b>	PIT driver almost crashed into OIG auditors, because he was driving too fast and did not blow his horn.		PIT not properly maintained. Operator not wearing seat belt. Supervisors not trained.	PIT operator not wearing seat belt. Supervisors not trained.	PIT operator not wearing seat belt.			Six PIT operators did not receive triennial training.
<b>Eyewash and Shower Units</b>	One eyewash and shower unit had a pole blocking entry into the room. Others were in locked rooms.	Rewrap room only had one 16 oz. eyewash bottle. Facility has an eyewash unit for this area but maintenance has not installed it yet.	Eyewash and shower unit located too close to a hot water heater.	One eyewash and shower unit not inspected as required. Two eyewash and shower units located next to electrical switches. One broken eyewash unit and one eyewash unit with obstructed access.		Portable eyewash in Hazmat room was blocked by boxes, and water was not replaced as required.	One eyewash and shower unit was not easily accessible to employees because it was blocked by clutter and boxes.	Only eyewash and shower unit on plant floor is locked in the Hazmat room. No eyewash unit near ink refill area.
<b>Electrical</b>	An electrical panel was blocked by mail.	Electrical panel blocked, unprotected electrical conduit, electrical panel left open.	Extension cords, electrical panel not covered, electrical panel not properly labeled, blocked electrical panel.	Extension cords, exposed electrical wires.	Extension cord, covers left off electrical boxes.	Broken light switch, missing outlet cover, extension cords, exposed wiring.		
<b>Unanchored Lockers</b>		Cabinets and lockers not anchored.	Several lockers not anchored with items placed on top.			Lockers not anchored.		
<b>Fire Prevention</b>	Two blocked fire extinguishers.	Blocked fire extinguisher and alarm. Fire extinguisher not tagged.	Blocked fire extinguisher.			Two blocked fire extinguishers.		

## Appendix C: Management's Comments

DEBORAH GIANNONI-JACKSON  
VICE PRESIDENT  
EMPLOYEE RESOURCE MANAGEMENT



October 12, 2011

TO: Shirian B. Holland  
Acting Director, Audit Operations

SUBJECT: Draft Audit Report – Postal Service Health and Safety Program (Report Number HR-AR-12-DRAFT)

Thank you for the opportunity to review and comment on the draft audit report HR-AR-12-DRAFT. This letter constitutes the response from Employee Resource Management.

### Management's Response to Findings in the Draft Audit Report

As the audit addressed operations at P&DCs in multiple Areas, a separate response to findings will be submitted from each affected Vice President, Area Operations.

### Management's Response to Recommendations in the Draft Audit Report

The following is the response to recommendations addressed to the Vice President, Employee Resource Management.

#### Recommendation 1

*Review and revise, as appropriate, supervisor performance measures to place a higher priority on maintaining a safe and healthy work environment; for example: performance measures could be linked to the number of abated and/or unabated safety hazards.*

Management Response: Management agrees with this recommendation.

Action Plan: In FY 2012, the PEG score will be a compensable indicator on the National Performance Assessment (NPA) scorecard for: District Managers; PCES Post Office managers and EAS staff; PCES Plant managers and EAS staff; P&DC EAS staff; and level 21 to 26 Post Office EAS staff. This is the first year that the PEG score will be a compensable indicator since 2007.

The PEG measures many criteria that reflect commitment to maintaining a safe work environment, including:

1. Abatement of safety and health inspection findings within a prescribed period of time,
2. Abatement of employee-reported hazards or unsafe conditions (submitted Forms 1767) within a prescribed period of time,
3. Completion of preventive maintenance for life safety equipment,
4. Correction of findings identified during the PEG evaluation within 30 days, and
5. Findings from quarterly special emphasis observations conducted by District Safety staff, which include a Facility Safety Condition checklist.

Responsible Party: Robert J. Brant, Manager, Safety and OSHA Compliance Programs

Target Implementation Date: Completed; NPA has confirmed that FY 2012 PEG scores are a compensable indicator effective 10/1/11.

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**Recommendation 2**

*Update policies in the Safety Toolkit regarding training requirements for Powered Industrial Truck operation to ensure they are consistent with Occupational Safety and Health (OSHA) requirements.*

**Management Response:** Management agrees with this recommendation.

**Action Plan:** The safety training matrix for Powered Industrial Truck (PIT) training was updated to remove the reference to triennial training requirements for PIT operators. The applicable OSHA standard [29 CFR 1910.178(l)(4)] requires triennial performance evaluations for PIT operators; retraining is required only when the evaluation reveals that the operator is not operating the PIT safely. The National Center for Employee Development hosts the safety training matrix source file, and the Safety Toolkit links to the corrected document.

**Responsible Party:** Robert J. Brant, Manager, Safety and OSHA Compliance Programs

**Target Implementation Date:** Completed; the PIT safety training matrix was updated on 9/19/11.

**Recommendation 3**

*Distribute all policy updates and revisions to field managers and supervisors to help ensure consistent implementation of Postal Service and OSHA requirements.*

**Management Response:** Management agrees with this recommendation.

**Action Plan:** For many years, the Safety Resources webpage has been used to disseminate policy information to the field. The Safety Resources page has been replaced by a new webpage titled "Resources for Safety and OSHA Compliance." The new webpage has several features that will make policy updates and revisions more visible:

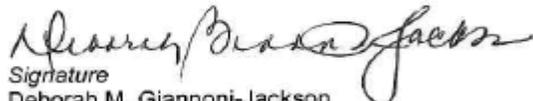
1. The opening page has a News feature, which will be used to announce new or updated policy.
2. The navigation bar on the new page has a dedicated USPS Policy & Guidance section, which is always visible and makes linked safety policy documents more accessible.
3. The new page has a feature that allows notes for linked documents, which will be used to document revision dates.

The "Resources for Safety and OSHA Compliance" webpage is available from Blue and the Safety Toolkit to reach a maximum number of field personnel.

**Responsible Party:** Robert J. Brant, Manager, Safety and OSHA Compliance Programs

**Target Implementation Date:** Completed; the new "Resources for Safety and OSHA Compliance" webpage was released on 9/30/11.

We have reviewed the draft audit report, and there is no information in the report or in this response that would be exempt from disclosure under the Freedom of Information Act. If you have any questions about this management response, please contact Robert Brant, Director of Safety and OSHA Compliance at 202-268-3690.



Signature  
Deborah M. Giannoni-Jackson  
Vice-President, Employee Resource Management

cc:

Sally K. Haring, manager, Corporate Audit and Response Management  
Vice Presidents, Area Operations

SYLVESTER BLACK  
VICE PRESIDENT, WESTERN AREA OPERATIONS



October 14, 2011

Office of the Inspector General  
Attention: Shirian Holland  
Acting Director, Audit Operations  
1735 N. Lynn Street  
Arlington, VA 22209-2020

SUBJECT: Postal Service Health and Safety Program  
Report Number HR-AR-12-DRAFT

This is in response to your correspondence dated October 3, 2011, regarding the above referenced subject. Upon investigation of the issues with the [REDACTED] P&DC, the following information is provided. Management agrees that safety must remain a focus for all levels of postal personnel and takes the review as opportunity to improve our safety program.

We have reviewed the draft audit report. There is no information in the report, or in this response, that would be exempt from disclosure under the Freedom of Information Act.

As the audit addressed operations at P&DCs in multiple areas, the following is Western Area's management response to the findings identified at the [REDACTED] P&DC. We disagree with the findings as set forth below.

Page 4 of the draft audit report states:

*The [REDACTED] P&DC had five eyewash/emergency eyewash and shower units and one portable eyewash unit. All six were in locked rooms, preventing easy access. In addition, one of the rooms had a pole at the entrance, making it difficult to enter.*

Eyewash and Shower Stations:

- 1910.151(c) requires eyewash and shower stations where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.
  - There is no OSHA standard that requires eyewash and shower units to be available to all employees on the workroom floor. The eyewash and shower units should be available to those employees working with corrosive material or for those mixing chemicals.
  - Although no standard requires additional eyewash and shower units as a result of the OIG audit, additional eyewash and shower units were purchased and made available on the workroom floor.

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- 2 -

Page 9 of the draft audit report states:

*At the ██████████ P&DC, employees submitted PS Forms 1767 in February and March, 2010, complaining about unsafe driving practices by PIT operators. Management stated they took steps to abate this issue, including holding safety talks and installing speed limiters on PIT equipment. However, on May 18, 2010, an OSHA complaint was filed stating that PIT operators were not following speed limits and were not honking their horns when required.*

May 18, 2010, OSHA complaint stating PIT operators were not following the speed limits and were not honking their horns when required.

- Prior to the OIG audit on August 11, 2010, Western Area Safety required the ██████████ plant Safety Specialist to conduct PIT observations/evaluations once per week in addition to, and not in lieu of, the supervisor requirements for observations.
- The ██████████ Senior Plant Manager certified the three-year evaluation and provided re-training to all PIT operators, including a PIT Instructor class discussion, student workbook, video and a Q&A session completed on December 7, 2010.
- ██████████ PIT equipment is equipped with "governors," which do not allow PIT equipment to go beyond the recommended speed limit.
- ██████████ also installed mirrors, stop signs and honk signage, which was accepted by OSHA as proper abatement to the OSHA complaint referenced on May 18, 2010.

The following is Western Area's management response to recommendations made to the Vice President, Western Area Operations.

Recommendation/Management Response/Action Plan

Recommendation 4: Establish and implement Standard Operating Procedures (SOP) for dock operations.

- Although no reference was made to the ██████████ P&DC or the ██████████ NDC dock operations, Western Area follows the guidelines listed in the SOP Receiving and Dispatching Vehicles, November 7, 2007. The guideline was issued by Headquarters Manager, Surface Operations. This SOP guideline is a national framework and applies, as deemed appropriate, by local management to address site-specific dispatch conditions and dock operations. Dock operations across the Western Area must be facility-specific as personnel, equipment and layout/design are different at each facility. The Western Area Safety Office will reinforce the existing Standard Operating Procedure: Receiving and Dispatching Vehicles. A letter will be sent to Senior Plant Managers reinforcing the existing SOP. Dock operations will be reviewed during the required semi-annual Safety and Health Inspections. Target Completion Date: May 31, 2012. Responsible Official: Laveda Padilla, Western Area Safety Manager.

Recommendation 5: Perform and oversee preventive maintenance procedures for eyewash and shower units.

- Although management believes adequate policies and tools are in place to address preventive maintenance on eyewash and shower units, Western Area will reinforce the existing guidelines related to preventive maintenance. Eyewash and shower units are considered an Emergency System (EMSYS). Emergency System checklists are loaded into eMARS and produce route sheets automatically. The route sheets are emailed directly to the Maintenance supervisor. The Western Area Maintenance Office

- 3 -

will reinforce the importance of existing preventive maintenance procedures for eyewash and shower units during the scheduled maintenance telecom. In FY12, District Safety will review the preventive maintenance on eyewash and shower units during the PEG 2.0 Program Evaluation Guide audits. Western Area Safety will provide a "PEG 2.0 Score by Facility" report to the Western Area Maintenance Manager for review and follow up during future maintenance telecoms. Target Completion Date: September 30, 2012. Responsible Official: Laveda Padilla, Western Area Safety Manager.

Recommendation 6: Conduct required Safety and Health Inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for the employees.

- Management believes adequate policies and tools are in place to ensure Safety and Health Inspections are completed timely. Per the ELM, the Western Area is 100% complete for all required Safety and Health Facility Inspections in FY11. For any safety and health deficiencies that cannot be abated within 20 or 45 days, because they are not within local management control, a hazard abatement plan is completed to provide interim safety measures. District Safety Managers follow up on all open deficiencies until they are fully resolved. On September 16, 2011, the FY12 Safety Program letter was sent to Western Area District Managers for dissemination and implementation. This letter emphasized the importance of Safety and Health Inspection completion. Western Area Safety will conduct quarterly reviews on Safety and Health Inspection completion by tracking progress. The findings will be discussed and reviewed by Western Area Safety during safety telecoms with District Safety Managers. All Safety and Health Inspections and PEG audits will be completed by September 30, 2012. Target Completion Date: September 30, 2012. Responsible Official: Laveda Padilla, Western Area Safety Manager.

Recommendation 7: Enter Postal Service Forms 1767 accurately and timely in the Safety Toolkit.

- Although there is no OSHA standard that requires PS Form 1767 entry into the Safety Toolkit, management agrees with the need to track employees' reports of hazard and unsafe conditions. The Western Area Safety Office will reinforce the importance of compliance with ELM 824.634, 1767 process, during a scheduled safety telecom. PS Form 1767 entry into the Safety Toolkit will be reviewed and audited during the PEG 2.0 Program Evaluation Guide audits. Western Area Safety will conduct quarterly reviews on PS Form 1767 entry utilizing the "PEG 2.0 Scores by Facility" report. Progress will be reviewed and discussed by Western Area Safety during safety telecoms with the District Safety Managers. Western Area Target Completion Date: September 30, 2012. Responsible Official: Laveda Padilla, Western Area Safety Manager.

If you have any questions regarding management's response, please contact Laveda Padilla, Western Area Safety Manager, at (303) 313-5625.



Sylvester Black

cc: Simon M. Storey, Manager, Human Resources - Western Area  
Steven J. Juhl, Controller - Western Area  
Sally K. Haring, Manager, Corporate Audit Response Management

VICE PRESIDENT  
CAPITAL METRO AREA OPERATIONS



October 18, 2011

SHIRIAN B. HOLLAND  
ACTING DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service Health and Safety Program  
(Report Number HR-AR-12-DRAFT)

Thank you for the opportunity to review and comment on the Postal Service Health and Safety Program draft audit report. Capital Metro Area (CMA) is committed to a safe and healthy work environment. The following responses represent our findings and actions to address the deficiencies identified at the [REDACTED] P&DC in addition to the OIG recommendations to implement management controls to ensure compliance.

**Recommendation 4:**

Establish and implement standard operating procedures for dock operations.

**Management Response/Action Plan:**

Management agrees in part with the recommendation. There were no identified dock issues at [REDACTED] CMA follows guidelines listed in the HQ Standard Operating Procedures (SOP) for Receiving and Dispatching Vehicles (issued November 7, 2007). The HQ Surface Operations guidelines require site-specific SOPs for receiving and dispatching vehicles at all postal facilities.

The EL 801, Supervisor Safety Handbook outlines Yard and Dock Operations in Chapter 4, Processing and Distribution Operations. Dock areas are inspected for deficiencies during semi-annual Safety and Health Inspections. Identified deficiencies are recorded in the Safety Toolkit (STK) using the dock area inspection criteria checklist. Daily Safety Condition Checklists are used by employees and supervisors to ensure the work areas are free of hazards. As a result of the OIG findings in the report, management will reissue SOPs to Operational managers to ensure compliance.

MAILING ADDRESS:  
16501 SHADY GROVE ROAD  
GAITHERSBURG, MD 20898-9998  
301 548-1410  
FAX: 301 548-1434

Target Implementation Date:

November 18, 2011

Responsible Official:

Manager Network Operations, Capital Metro Area

Recommendation 5:

Perform and oversee preventative maintenance procedures for eyewash and shower units.

Management Response/Action Plan:

Management agrees in part with the findings at ██████ P&DC. Although there were no specific references included in the report for ██████ P&DC, Appendix B: Hazards Identified by Location indicates: *"Only eyewash and shower on plant floor is locked in the hazmat room. No eyewash unit near ink refill area."*

Before the OIG's visit, ██████ P&DC had three eyewash units and three shower units located in the Battery room, the Hazmat room, and the Chiller Room. All units were in rooms with controlled security access. As a result of the OIG recommendations, six additional eyewash units have been installed in the facility and are available to the employees. Additionally, an eyewash unit has been installed near the ink refill area as recommended.

OSHA does not have any specific requirements for "adequate" eyewash and shower equipment. Their enforcement relies on ANSI Z358.1-1998. All plumbed units are tested weekly and all units are inspected annually to confirm compliance with the ANSI standard. Eyewash and shower units are included in the Preventive Maintenance schedule weekly and documented through the Electronic Maintenance Activity Reporting and Scheduling (eMARS) tracking system. OSHA 29 CFR 1910.151(c) requires suitable facilities for quick drenching or flushing of the eyes and body, with the work area for immediate emergency use, when the eyes or body of any person may be exposed to injurious corrosive materials.

Target Implementation Date:

Action completed on June 1, 2011 (see attached supporting documentation).

Responsible Official:

██████ P&DC Plant Manager

**Recommendation 6:**

Conduct required safety inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for employees.

**Management Response/Action Plan:**

Management can not respond specifically to this recommendation for [REDACTED] P&DC as no examples were provided. Under the header Semi-Annual Inspections, [REDACTED] P&DC along with three other Plants was identified as having unabated safety hazards, listed as abated. In CMA, all required safety inspections are conducted and entered into the STK in accordance to ELM Chapter 8, section 824. If deficiencies are identified, a Hazard Abatement Committee is established. A Hazard Abatement Plan (HAP) is required for all inspection deficiencies that have been open for greater than 20 days. CMA inspections and abatements are tracked by the Area and District Safety office weekly. All CMA inspections were completed for FY 2010.

**Target Implementation Date:**

Action Completed 9/30/11

**Responsible Official:**

HR Manager, Capital Metro Area

**Recommendation 7:**

Enter Postal Service Forms 1767 accurately and timely in the Safety Toolkit.

**Management Response/Action Plan:**

Management agrees PS Form 1767 provides a channel of communication between employees and management that promotes a prompt analysis and response with corrective action. Management agrees with the findings at [REDACTED] P&DC. [REDACTED] P&DC entered 97% of the PS Form 1767 in the STK; four PS Form 1767s were not entered according to *Table 2 – PS Form 1767 Data by Location from 2009-2011*.

Based on the OIG's recommendations during their review, management implemented a process to address the PS Form 1767 in the Plant Manager's Direct Report Meetings, in a newly developed pre-Joint Labor Management Safety and Health

Committee meeting and during the Joint Labor Management Safety and Health Committee meeting. The purpose is to thoroughly review submitted PS Form 1767s. A safety talk was issued entitled Keeping Our Focus: Form 1767, Report of Hazard, Unsafe Condition or Practice. A PS Form 1767 SOP is reissued annually. CMA will issue a safety talk about PS Form 1767, Report of Hazard, Unsafe Condition or Practice usage Area wide and will add it as an agenda item to our next Area Joint Labor Management Safety and Health Committee meeting. Management recognizes the opportunities to improve safety procedures and reduce OSHA activities through educating employees to engage in hazard abatement.

Target Implementation Date:

Action Completed 10/14/11 (See attached documents for Dulles P&DC)  
November 2011 (CMA)

Responsible Official:

HR Manager, Capital Metro Area

Capital Metro Area is committed to providing a safe workplace for all employees. A letter will be issued to District Managers outlining management responsibilities for District-wide safety program requirements and compliance. Human Resources will continue to monitor area safety and health programs and performance in accordance with national policy and direction.



David C. Fields  
Vice President  
Capital Metro Area Operations

cc: Manager, Corporate Audit and Response Management  
Manager, Human Resources CMA

Attachments

VICE PRESIDENT  
CAPITAL METRO AREA OPERATIONS



October 18, 2011

ROBERT A. BORRIS

SUBJECT: OIG Audit Report – Postal Service Health and Safety Program  
(Report Number HR-AR-12-DRAFT)

**Recommendation 4:**

Establish and implement standard operating procedures for dock operations.

Headquarters' Surface Operations issued guidelines for the receipt and dispatch of motor vehicles to prevent accidents generally caused by the unauthorized movement of vehicles away from the dock prior to completion of loading and unloading. However, due to variations in dock operations, facility configurations, and other site-specific issues, each facility is required to have its own SOP. During the audit, the OIG stated site-specific SOPs for Receiving and Dispatching Vehicles were not readily available. As a result of the OIG national findings, please reissue the SOP for Receiving and Dispatching Vehicles (November 7, 2009) Area-wide.

A copy of the letter is due in my office no later than November 18. If you have any questions, please contact Mangala P. Gandhi, Human Resources Manager, at 301-548-1460.



David C. Fields

cc: Mangala P. Gandhi

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RECOMMENDATION 5



RECOMMENDATION 5



RECOMMENDATION 5



## RECOMMENDATION 5

### USPS

Page 1 of 1

Req # 11944988  
 Requisition Name :  
**SECONDARY EYE  
 WASH STATIONS**

Ship To : 18337L PLANT MAINT USPS 	Bill To : S12704  CAPITAL METRO P&DAO	ON-CATALOG Order Type : EXPENSE Generated POs: USP002572867	
Created By : 	Date Created : 05/13/2011	Date Due : 05/16/2011	Ship Via : Standard

**Justification :** REQUESTED BY SAFETY OFFICE CHERYL SAUNDERS. OIG AUDIT MADE RECOMENDATION TO PURCHASE BASED ON OSHA PERSONAL PROTECTIVE EQUIPMENT STANDARDS. THEY ARE TO BE LOCATED AT EACH JANITOR CLOSETS.

**Delivery Instructions :**

<b>Completed Approvals</b>  05/16/2011 Complete:05/16/2011	<b>Remaining Approvals</b>
--	----------------------------

Item No (SKU)	Description	Unit	Status	Cost	Qty	Ext. Price
127042 (1KW77)	Eye/Skin Station Dual -- Dual Eye/Skin Station Capacity Two 32 Ounce Bottles -- GRAINGER GL Code : 52173.000	EACH	in purchasing	\$40.56	6.000000	\$243.36
<b>Requisition Total:</b>						<b>\$243.36</b>

Note	Created by	Created Date
No Notes		

Ordered

## RECOMMENDATION 7

PLANT MANAGER  
[REDACTED] PROCESSING AND DISTRIBUTION CENTER



Safety Program Evaluation Guide (PEG)  
Criteria: Category I-a Number 2.2.1

DATE: November 22, 2010

REISSUE

MEMORANDUM FOR: ALL EMPLOYEES

**SUBJECT: Standard Operating Procedure (SOP) for PS 1767, Report of Hazard, Unsafe Condition or Practice**

The purpose of PS Form 1767 is to report any unsafe practice or hazardous condition. PS Form 1767 should be properly tracked, responded to and recorded on the PS Form 1773, Hazard Log. The Hazard Log is used to track all PS Form 1767s during the fiscal year. Management is responsible for timely responses on all PS Form 1767s. Management will respond to each PS Form 1767 during the same tour of duty in which it is received and a copy of the response will be provided to the employee who filed the notice.

Employee Instructions For Completing PS Form 1767:

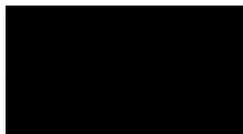
1. Complete section I, and file it with your immediate supervisor.
2. If you desire anonymity, complete section I, (including your name) and file the report with the District Safety Office. Safety personnel will immediately return the form to your supervisor for necessary action and will delete your name from the form to ensure your anonymity.

Supervisor Instructions For Completing PS Form 1767:

1. Investigate the alleged hazard during the same tour of duty in which the report was received.
2. Abate the hazard if it is within the scope of your authority to do so.
3. Record the action taken to eliminate the hazard or record recommendations for corrective action in section II and sign your name.
4. Forward the original and yellow copy to your immediate supervisor (approving official), send the pink copy to the District Safety Office, and give the employee the mainlining blue copy as a receipt. It is your responsibility to monitor the status of the report at all times until the hazard is abated.

Approving Officials Instructions For Completing PS Form 1767:

1. Initiate action to eliminate or minimize the hazard. If this results in the submission of a work order, attach the original of the form and forward through proper channels to maintenance.
2. If you determine that there are no reasonable grounds to believe a hazard exists, notify the employee in writing within 15 calendar days. Safety personnel will assist you in this determination when requested.



# RECOMMENDATION 7 SAFETY FOR SUPERVISORS



District SAFETY October 14, 2011

## Keeping Our Focus : Form 1767 Report of Hazard, Unsafe Condition or Practice

District Safety will be sending a newsletter out with Supervisor information. Other Safety Related Emails to watch for: \*Monthly Safety Talks and Calendar- available On NOVA Safety webpage\*Weather Alerts For Hazardous Weather\*Mandatory Safety Talks



ELM

## 824.61 Purpose of PS Form 1767, Report of Hazard, Unsafe Condition or Practice

PS Form 1767 is designed to encourage employee participation in the Postal Service Safety and Health Program and to provide prompt action when employees report a hazard. This form provides a channel of communication between employees and management that promotes a prompt analysis and response with corrective action to reports of alleged hazards, unsafe conditions, or unsafe practices.

### 824.62 Availability of Form

Supervisors must maintain a supply of PS Forms 1767 in the workplace in a manner that provides employees with both easy and (if desired) anonymous access.

- Proper use of 1767's help eliminate hazards before an accident or injury occurs
- All employees should know where they are and how to use them
- Make sure they are legible – reports and signatures should be printed
- ALL 1767's should be entered into Safety Toolkit

## 824.63 Procedures and Responsibilities

### 824.631 Employee

Any employee, or the representative of any employee, who believes that an unsafe or unhealthful condition exists in the workplace may do any or all of the following:

- File a report of the condition on PS Form 1767 with the immediate supervisor and request an inspection of the alleged condition.
- If the employee desires anonymity, file PS Form 1767 directly with the installation's safety personnel, who will immediately give the report to the employee's supervisor for necessary action. (In such cases, safety personnel must not disclose the name of the individual making the report.)
- Report alleged unsafe conditions to a steward, if one is available, who may then discuss the condition with the employee's supervisor.

Discrimination against an employee for reporting a safety and health hazard is unlawful.

### 824.632 Supervisor

The immediate supervisor must promptly (within the tour of duty):

- Investigate the alleged condition.
- Initiate immediate corrective action or make appropriate recommendations.
- Record actions or recommendations on PS Form 1767.
- Forward the original PS Form 1767 and one copy to the next appropriate level of management (approving official).
- Give the employee a copy signed by the supervisor as a receipt.
- Immediately forward the third copy to the safety office.

**It is the supervisor's responsibility to monitor the status of the report at all times until the hazard is abated.** If the hazard remains unabated longer than 7 calendar days, the supervisor must verbally inform the employee as to abatement status at the end of each 7-day interval.

**REMEMBER TO FOLLOW THE HAZARD THROUGH COMPLETION. MAKE SURE IT IS ABATED.**

**"We are what we repeatedly do, SAFETY , therefore, is not an act, but a habit"**



DREW T. ALIPERTO  
VICE PRESIDENT, PACIFIC AREA OPERATIONS

October 18, 2011

SHIRIAN HOLLAND  
ACTING DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service Health and Safety Program 11YG019HR000

This is in response to your correspondence dated October 3, 2011, of the above referenced subject. Upon investigation of the issues, the following information is being provided to you. Management agrees that safety must remain a focus for all levels of postal personnel and take the review as opportunity to improve our safety program.

We have viewed the draft audit report, and there is no information in the report or in this response that would be exempt from disclosure under the Freedom of Information Act.

Management Response/Action Plan

The following is Pacific Area managements response to recommendations made for Vice Presidents, Area Operations.

Recommendation/Management Response/Action Plan

Recommendation 4: Establish and implement standard operating procedures for dock operations.

- Pacific Area plants follow the guidelines listed in the SOP Receiving and Dispatching Vehicles Nov. 7, 2007. The guideline was issued by Manager, Surface Operations HQ. This SOP guideline is a national framework and applies as deemed appropriate by local management to address site specific dispatch conditions and dock operations. Dock operations across the Pacific Area must be facility specific as personnel, equipment, and layout/design are different at each facility. The Pacific Area Safety Office will reinforce the existing Standard Operating Procedure: Receiving and Dispatching Vehicles. A letter will be sent to the Senior Plant Managers reinforcing to the existing SOP. Target Completion Date: Completed by 12/31/2011. Responsible Official: Safety Manager, Pacific Area.

Recommendation 5: Perform and oversee preventive maintenance procedures for eyewash and shower units:

- Eyewash and shower units are considered an Emergency System. Emergency System (EMSYS) checklists are loaded into eMARS and produce route sheets automatically. The Pacific Area Maintenance Office will reinforce the importance of existing preventive maintenance procedures for eye wash and shower units, during a scheduled maintenance telecom. We are in alignment with Safety Program Evaluation (PEG) requirements. Target Completion Date: 12/31/2011. Responsible Official: Safety Manager, Pacific Area.

11255 RANCHO CARMEL DR  
SAN DIEGO CA 92197-0100  
858-674-3100  
FAX: 858-674-3101  
www.usps.com

- 2 -

Recommendation 6: Conduct required safety and health inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for the employees:

- Safety and health inspections of plants are scheduled to be completed semi-annually. The scheduled dates are established in the Safety Toolkit. Deficiencies identified during the inspection are input to the safety and health inspection report in Safety Toolkit. Installation management will be reminded that deficiencies within their control must be abated in less than 20 days. Deficiencies beyond local management control or that will exceed 20 days to abate must have a Hazard Abatement Plan prepared and sent to the District for assistance. This will be reviewed at least quarterly for unabated deficiencies exceeding 20 days. Target Completion Date: 12/31/2011. Responsible Official: Safety Manager, Pacific Area.

Recommendation 7: Enter Postal Service Forms 1767 accurately and timely in the safety toolkit:

- The following instructions will be reinforced with each Plant supervisor. Supervisors who receive a report of hazard, unsafe condition or practice will investigate promptly and initiate immediate corrective action or make appropriate recommendations. This information will be documented on the PS Form 1767 and forwarded to the immediate manager for approval. The employee will be given a copy signed by the supervisor as a receipt and a copy forwarded to the safety office. The supervisor or Facility Safety Coordinator will enter the hazard information into the Hazard Log in Safety Toolkit and monitor the status of the report until the hazard is abated. If the hazard remains unabated longer than 7 calendar days, the supervisor must verbally inform the employee as to abatement status at the end of each 7-day interval. Facility Safety Coordinators at each Plant will input the hazard report, investigation findings and resolution and supervisor. The hazard log in the safety toolkit will be reviewed quarterly for compliance. Target Completion Date: 12/31/2011. Responsible Official: Safety Manager, Pacific Area.

If you have any questions about management response please contact Safety Manager, Pacific Area at (858) 674-2705.



Drew Aliperto

cc: Rizza Hambric, Pacific Area Human Resource Manager  
Sally K. Haring, Manager, Corporate Audit Response Management

JO ANN FEINDT  
Vice President, Great Lakes Area Operations



October 17, 2011

Shirian B. Holland  
Acting Director, Audit Operations  
1735 North Lynn St.  
Arlington VA 22209-20202

Subject: Postal Service Health and Safety Program  
Report Number HR-AR-12-DRAFT

This correspondence is in response to an October 3, 2011 Draft Audit Report regarding the Postal Service Health and Safety Program. After a thorough perusal of the draft report and those items pertaining to the Great Lakes Area I find there are some factual inaccuracies in the report, some systemic program issues that should be addressed and some issues that have merit.

I must totally disagree with the finding that safety is not a priority. The Great Lakes Area places a high priority on the safety of our employees. We go above and beyond in involving our employees in accident reduction efforts, inspection activities and abatement of deficiencies. The Great Lakes Area is one of only two Areas to have implemented Joint Safety Taskforce committees at each of our districts. These committees are comprised of four NALC appointed members and four management representatives tasked with addressing potential safety issues involving our employees. These committees meet monthly to develop strategies and programs that benefit our employees and provide a safer workplace. I do not agree with the assertion that safety is not a priority.

I do agree that the Safety Toolkit needs to be updated regarding Powered Industrial Equipment to align with OSHA requirements. One item regarding operator refresher training triennially has been corrected. The Toolkit requirement for installation heads to have the same level of skills sets as an equipment operator is not an OSHA requirement and provides no operational or economic benefit to the USPS. This item should be corrected in the Safety Toolkit as there is no valid reason or any benefit for an executive level manager to be required to learn to operate powered industrial equipment.

**Recommendations Specific to [REDACTED] P&DC**

**Powered Industrial Trucks** – The draft report indicates that PIT was not properly maintained, operators were found not wearing a seat belt and supervisors were not trained per the Safety Toolkit requirement. We agree in part with these findings. District Manager Peter Allen has already increased emphasis on maintenance of the equipment and operator driving behaviors. Emphasis is also increased on operators inspecting the equipment prior to it being operated.

244 KNOLLWOOD DRIVE FLOOR 4  
BLOOMINGDALE, IL 60117-1000  
630-539-5885  
FAX: 630-539-7171

- 2 -

We disagree on the supervisors being trained on equipment operation to the level of the operators. This issue is addressed in our agreement to update the Safety Toolkit to reflect OSHA requirements.

**Eyewash and shower unit** - We agree with this finding and the issue was abated during the audit process.

**Electrical Issues** – We agree that the use of extension cords must be limited and Code compliant. Safety Manager Felicia Coleman will increase emphasis on informing employees that use of these cords is prohibited.

We also agree with the finding described as an electrical panel not covered. Actually it was a junction box where a time clock had been removed the prior day. The cover was installed, abating this issue.

We neither agree nor disagree with the finding of an unlabeled electrical panel as we are unaware of its existence. With the implementation of the USPS Electrical Work Plan in recent months we are confident that all panels are currently labeled.

We do not agree with the finding of a blocked electrical panel. OSHA requires working clearance in 1910.303(g) (1) when employees perform work on energized circuits or parts, and only in certain situations. Storage in these areas is prohibited by the Code. Our electricians perform work only on de-energized parts under the requirements of our Electrical Work Plan. Storage in front of these panels is not an OSHA violation and does not present a hazard to our employees.

**Unanchored Lockers**- We agree in part with the finding of the unanchored lockers with items placed on top of them. OSHA requires that all storage be secure. In many instances anchoring stable lockers or filing cabinets to a wall or surrounding surface does not increase the stability of the item and presents other potential hazards which may include drilling into asbestos containing materials to install a bracket. We agree to increase emphasis on unstable items and items stored on top of cabinets during the semi-annual inspection of the facility.

**Fire Prevention** – We also disagree with the finding of a blocked fire extinguisher being identified as a hazard. The Emergency Action Plan for the facility requires the total evacuation of the facility in the event of a fire. Although fire extinguishers are provided, they are not intended for employee use. It is the facility policy, supported by OSHA and the National Fire Protection Association, that the best interests of our employees are served by an immediate evacuation rather than exposing them to the hazard of fighting fires. 29 CFR 1910.157 fully allows this position and provides that in those facilities where extinguishers are provided but are not intended for employee use in fighting fires only the maintenance, testing and hydrostatic testing requirements of the standard must be met. Spacing and accessibility requirements do not apply unless employees are expected by the employer to use the extinguishers to fight fires with them.

Sincerely,



Jo Ann Feindt

JORDAN M. SMALL  
VICE PRESIDENT, AREA OPERATIONS  
EASTERN AREA



October 18, 2011

TO: SHIRIAN B. HOLLAND  
ACTING DIRECTOR, AUDIT OPERATIONS

SUBJECT: Postal Service Health and Safety Program 11YG019HR000

This is in response to your correspondence dated October 3, 2011, on the above referenced subject. Upon investigation of the issues with the [REDACTED] the following information is provided. Management agrees that safety must remain a focus for all levels of postal personnel and this review provides an opportunity to improve our safety program.

OIG inspection findings:

On May 24, 2010 the OIG officers observed PIT operators driving without wearing seat belts.

- The possibility of some of the PIT operators not wearing seat belts is valid. There are three different manufacturers of PIT at the [REDACTED]. The Toyota PIT equipment is equipped with seatbelts. The Clark and Pettibone PIT are not all equipped with seat belts and were manufactured that way. These PITS are not required to be retrofitted with seat belts.
- Management conducted PIT talks to ensure all drivers follow the seat belt rules and that they follow the overall safety procedures when operating a PIT.
- Supervisors and management continuously spot check all PIT drivers for seat belt use and safe operations.
- All PIT equipment at the [REDACTED] is equipped with the Powered Industrial Vehicle Management System (PIVMS). This requires all operators to complete a pre-tour safety inspection of the equipment. The system is also used to track the operation and maintenance of the vehicles along with numerous other functions.

On May 24, 2010 the OIG officers observed a missing outlet cover and an extension cord used in lieu of permanent wiring. Both of these identified hazards were abated immediately. The following photos were taken during the observation and upon completion of abatement.



**Exposed Electrical Wires:**



**Extension cord used in lieu of permanent wiring:**



The two identified hazards should have been observed during the 2 yearly facility inspections and the yearly PEG evaluation. The facility manager, in conjunction with the facility safety specialist and district safety department, will conduct required safety and health inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for the employees.

Per the ELM the Eastern Area is 100% complete for all required safety and health facility inspections and PEGs in FY11. Any safety and health deficiencies that cannot be abated within 20 or 45 days because they are not within local management control, a hazard abatement plan is completed providing interim safety measures. The district safety managers follow up on all open deficiencies until they are fully resolved.



Management Response/Action Plan:

On May 23-25, 2011, the management group at the [REDACTED] worked in conjunction with the OIG officers during the review and abated the two deficiencies identified. They stepped up the observations of PIT drivers and provided safety talks regarding the safe operation and the required use of seat belts when a vehicle is equipped with them.

Target Implementation Date:

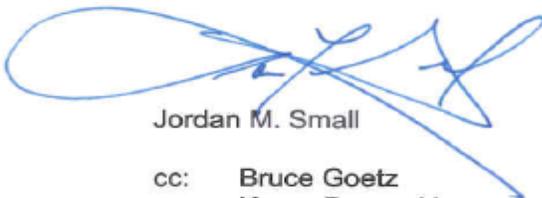
The implementation of the above mentioned programs was immediate.  
PEG 2.0 safety program audits were 100% complete by 9/30/2011  
Safety and Health Inspection were 100% complete by 9/30/2011

Responsible Official:

The [REDACTED] will continue to make every effort to provide a safe and healthful working environment to its employees. District safety specialist will conduct an annual PEG 2.0 safety program evaluation to review and audit compliance per the ELM. Semi Annual Safety and Health inspections will be conducted by district safety specialist per the ELM.

The [REDACTED] has been an OSHA VPP STAR site since May 2008. The facility has not had an OSHA citation in the last 4 years (2008-2011). The OSHA I&I Rate for this facility is 4.48 and have reduced accidents in FY-11 by 27%. This facility utilizes the 1767 process to ensure the employees and union's safety concerns are addressed. Of the total 177 PS Form 1767s submitted, all 100% were entered in the safety toolkit.

If you have any questions or need additional information, please contact Bruce E. Goetz, Eastern Area Safety Manager at 412-494-2039 or me at 412-494-2510.



Jordan M. Small

- cc: Bruce Goetz
- Karen Borowski
- Eric Faber
- Mark Tappe



RICHARD P. ULUSKI  
VICE PRESIDENT, AREA OPERATIONS  
NORTHEAST AREA



October 18, 2011

SHIRIAN B. HOLLAND, ACTING DIRECTOR, AUDIT OPERATIONS

SUBJECT: Draft Audit Report – Postal Service Health and Safety Program  
(Report Number HR-AR-12-DRAFT)

This response is in reference to the Draft Audit Report – Postal Service Health and Safety Program (Report Number HR-AR-12-DRAFT), specifically concerning the Northeast Area, Triboro District, [REDACTED] Processing & Distribution Center (P&DC).

The Northeast Area agrees with the findings and the recommendations.

Recommendation 2:

Update policies in the Safety Toolkit regarding training requirements for Powered Industrial Truck operation to ensure they are consistent with Occupational Safety and Health (OSHA) requirements.

Management Response/Action Plan:

Safety concerns related to PIT operation and training at the [REDACTED] P&DC contained six (6) PIT operators that did not receive the required triennial training. Management agrees there are some employees that have not received their required triennial training. Management will ensure employees are trained no later than November 18, 2011.

Target Implementation Date:

Management has identified the six (6) employees and will have all of the affected employees receive their training no later than November 18, 2011 or within five (5) days of their return to duty.

Responsible Official:

[REDACTED]

Recommendation 4:

Establish and implement standard operating procedures for dock operations.

6 GRIFFIN ROAD NORTH  
WINDSOR, CT 06095-7010  
860 285-7040  
FAX 860 285-1253  
WWW.USPS.COM

- 2 -

Management Response/Action Plan:

The [REDACTED] P&DC was experiencing recurring accidents on the inbound and outbound docks and platforms. At least ten incidents have occurred since June, 2010 and six of those occurred after the facility implemented a revised Standard Operating Procedure (SOP) for receiving and dispatching vehicles in August, 2010. Each facility is required to have its own SOP. Even though the [REDACTED] P&DC issued a SOP on August 2010, the OIG still identified safety concerns at this location.

Management agrees that there have been some accidents on the inbound and outbound docks and platforms. However, the OIG draft states there are still identified safety concerns at this location. Those concerns were not identified.

There have been some accidents with employees working on the inbound platform. These accidents occurred when employees failed to follow the SOP. The [REDACTED] P&DC has provided several safety talks, training, and refresher training to employees to ensure they are aware of the SOP for working on the platform and will be held accountable for following it.

Since April 26, 2011 there has been one same/similar type of accident. Our investigation revealed that in this instance, the SOP was not followed.

As far back as 2003 the Postal Service has instituted and provided training and safety talks on loading/off loading vehicles from the platform. These safety talks include the driver's responsibility to ensure that all vehicles moved to and from the platform are moved in a safe manner. All drivers are instructed via safety talks to chock their vehicles; visually inspect if their load is secure; and the path where they back up is clear before the vehicle is hooked up. This procedure includes sealing and tagging the vehicle. The safety talks also include instructions to mailhandlers regarding their responsibility to work safely.

Truck drivers working in the yard while moving equipment to various locations have had instances where they pulled out with powered industrial trucks (PIT) inside the trailer and the PIT has fallen out of the trailer. These instances resulted in changes in the yardman's SOP. As a result, the yardman must now physically check to ensure that the door is closed before the truck pulls away from the bay. Safety talks have been provided to drivers to inform them of the change in the SOP.

The [REDACTED] P&DC implemented the Red Light/Green Light policy in 2003. The loading dock stop-and-go light is a safety signaling device which alerts truck drivers and loading dock personnel to the safety status of docked or docking trucks. All drivers and mailhandlers have been given this training and/or safety talk. However, these accidents occurred when employees did not follow the SOPs that have been implemented for the protection of our employees. According to the SOP drivers and mailhandlers both have the responsibility of ensuring the vehicle/trailer is chocked.

- 3 -

Target Implementation Date:

On October 15, 2011 management initiated a safety talk program which will provide refresher training to the drivers and the mailhandlers on a quarterly basis. Furthermore, safety specialists will periodically monitor the inbound and outbound platform and conduct dock audits for any deficiencies and/or poor work practices. These audits will be unannounced. Additionally, supervisors will increase their presence in these areas, especially during peak times, to ensure that employees are working in a safe manner and are adhering to the SOP.

Responsible Officials:

[REDACTED] MDO Tour 1  
[REDACTED] A/MDO Tour 2  
[REDACTED] - MDO Tour 3  
[REDACTED] - Safety Specialist

Recommendation 5:

Perform and oversee preventive maintenance procedures for eyewash and shower units.

Management Response/Action Plan:

Postal Service policy requires emergency eyewash and shower units to be accessible through an unobstructed path that allows employees to reach them within ten seconds. These eyewash and shower units are to be tested weekly, and the location cannot be in a high-hazard area.

The OIG draft report identifies the eyewash and shower units as a safety issue, however, the report does not specify what the safety concern is. The Hazmat area eyewash station is kept locked to keep out unauthorized personnel. The eyewash is available to the employees that work in this room. The employees in that area do have access to the eyewash unit. There are other eyewash stations on the workroom floor that are not in a locked room as is the one in the Hazmat area. These other eyewash stations are always accessible to employees.

Target Implementation Date:

The Hazmat area eyewash station is currently accessible to the employees that work in this room and will continue to be accessible to them.

Responsible Official:

[REDACTED] P&DC

- 4 -

Recommendation 6:

Conduct required safety inspections and abate safety hazards in a timely manner to ensure safe and healthy working conditions for the employees.

Management Response/Action Plan:

Management agrees with this recommendation. The [REDACTED] P&DC FY 2011 Safety inspection had been completed and entered into the Safety Toolkit within the required time frame. However, one item that was listed as being abated but was not abated was the Emergency Action Plan. The Emergency Action Plan will be updated and posted no later than October 31, 2011.

Target Implementation Date:

The EAP will be updated and posted no later than October 31, 2011.

Responsible Official:

[REDACTED]

Recommendation 7:

Enter Postal Service Forms 1767 accurately and timely in the Safety Toolkit.

Management Response/Action Plan:

There were a total of 348 PS Form 1767s that were filed and a total of 342 that were entered into the Safety Toolkit. A total of six were not entered giving Brooklyn P&DC a total of 2% of their PS Form 1767s not entered.

Management agrees there were several PS Form 1767s which were not entered into the Safety Toolkit. To ensure these forms are entered into the Safety Toolkit and to ensure that supervisors respond within 24 hours to the employee, these forms are now being discussed each morning and in the afternoon in the tour turnover meeting with the Plant Manager, William Ryan, the Managers, Distribution Operations from each tour, and the Manager, Maintenance. The Safety Specialist responsible for the Brooklyn P&DC also attends these meetings and participates in the review process.

When the supervisor is able to resolve or eliminate a hazard he/she will complete section two of PS Form 1767 and return it to the employee within 24 hours. If the supervisor is unable to resolve or eliminate the hazard he/she will complete section two and forward the PS Form 1767 to the next higher level manager who will complete section three. Section four will be completed by maintenance when necessary. The employee will receive his copy of the PS Form 1767 within 24 hours to inform him if a workorder was submitted or if has been determined that there is no hazard.

- 5 -

Target Implementation Date:

Beginning in September, 2011 all PS Form 1767s will be reviewed and discussed at all turnover meetings and will be given to the Safety Specialist each day to input into the Safety Toolkit.

Responsible Official:

[Redacted]

The foregoing responses address the recommendations identified in the draft audit report for the [Redacted] P&DC.

*Richard P. Uluski*  
Richard P. Uluski (RU)

cc: Linda DeCarlo

LINDA J. WELCH  
VICE PRESIDENT, AREA OPERATIONS  
SOUTHWEST AREA



October 21, 2011

SHIRIAN B. HOLLAND  
ACTING DIRECTOR AUDIT OPERATIONS

**SUBJECT: Postal Service Health and Safety Program**

**Report Number HR-AR-12-DRAFT**

We appreciate the opportunity to review the subject report. We agree with the report on the condition that there is an opportunity for improvement in the overall safety program compliance. However, we feel that the current Safety Program elements such as Facility Inspections, Safety Training, and Program Evaluation Guide (PEG) 2.0 reviews, provide a multi-level process to monitor and correct compliance issues. Management does not agree with the premise of the report that "Safety is not a priority".

The Southwest Area has demonstrated safety as a priority by involving more facilities than any other Area in the Voluntary Protection Program (VPP) certification process. Additionally the Southwest Area currently holds an OSHA Injury and Illness rate 32% below the most recent Bureau of Labor Statics (BLS), for our industry category and leads the Postal Service with both the lowest OSHA II rate and Motor Vehicle Accident rate. This is a self evident testament to the commitment of our employees and managers to safety of all employees.

This letter will only be addressing those recommendations in the report which were directed to the Vice President, Area Operations.

Recommendation 4:

Establish and implement standard operating procedures for dock operations.

Management Response/Action Plan:

There was no reported dock issue in the Southwest Area facility reviewed according to this draft report. Continued commitment to safety will be maintained.

PO Box 224748  
DALLAS, TX 75222-4748  
214-619-8650  
FAX 214-905-9227

- 2 -

Recommendation 5:

Perform and oversee preventive maintenance procedures for eyewash and shower units.

Management Response/Action Plan:

Issues found at the [REDACTED] P&DC in the incidental spill area with their portable eyewash station were abated at the time of the audit. It was also verified at the time that preventive maintenance routes were established. It is believe that this will abate the issues found by this review.

Recommendation 6:

Conduct required safety inspection and abate safety hazards in a timely manner to ensure safe and health working conditions for the employees.

Management Response/Action Plan:

Management believes adequate policies and monitoring elements are in place to monitor required safety inspections and abatement process in the Southwest Area. Districts are reminded of this requirement through the Safety Program Policy letter issued annually by the Area leadership. Area Safety also monitors compliance with these ELM Sect. 824 requirements.

Policy Letter Issuance Date:

October - FY 2012

Responsible Official:

Daniel Penland, Manager Safety, Southwest Area

Recommendation 7:

Enter Postal Service Forms 1767 accurately and timely in the Safety Toolkit.

Management Response/Action Plan:

Management agrees with the need to address and respond to employee safety concerns through the PS Form 1767 process in compliance with the ELM Sect. 824.6. Review of the minimal concerns at the [REDACTED] P&DC, found that those reports which were not entered were either involved in other actions and pending input or addressed but not yet entered. A letter from the Area Safety manager will be sent to all Districts to ensure compliance with the ELM requirement concerning PS Form 1767.

- 3 -

1767 Instruction Letter Issuance Date:

October - FY 2012

Responsible Official:

Daniel Penland, Manager Safety, Southwest Area

A handwritten signature in black ink that reads "Linda J. Welch". The signature is written in a cursive style with a large initial "L".

Linda J. Welch

cc: Anthony J. Vegliante, Chief Human Resources Officer & Executive Vice President  
Corporate Audit and Response Management