

February 14, 2002

PAUL E. VOGEL
VICE PRESIDENT, NETWORKS OPERATIONS MANAGEMENT

KEITH STRANGE
VICE PRESIDENT, PURCHASING AND MATERIALS

SUBJECT: Management Advisory – Transportation of Anthrax Contaminated Mail
(Report Number TD-MA-02-001)

This report presents the results of our self-initiated review of the transportation of mail potentially contaminated with anthrax (Project Number 02YG002TD000).

Background

In response to the anthrax attacks in the fall of 2001, the Postal Service contracted with facilities in Lima, Ohio, and Bridgeport, New Jersey, to sanitize the mail. The Office of Inspector General reviewed the process for transporting mail to those facilities and returning it to the mail stream.

Objective, Scope, and Methodology

We reviewed the procedures used to transport mail from the Brentwood Mail Processing Center in Washington, D.C. to Lima, Ohio, and from the Trenton, New Jersey processing center to Bridgeport, New Jersey. We interviewed Postal Service officials at Postal Service Headquarters, the Brentwood center, and the Trenton center. We also reviewed transportation records at the headquarters of the contractor transporting the mail from Brentwood to Lima, and records at Trenton, for transporting mail by Postal Service vehicle from Trenton to Bridgeport. We conducted our review from November 2001 through February 2002, in accordance with the President's Council on Integrity and Efficiency, Quality Standards for Inspections. We discussed our conclusions and observations with appropriate management officials and modified our report accordingly.

Results

We understand the Postal Service's need to expedite the transportation of mail to be irradiated. However, we identified some transportation issues that the Postal Service should address before transporting additional mail.

Improperly Transported Contaminated Mail. The Postal Service improperly transported hazardous material using Postal Service vehicles from Trenton, New Jersey, to Bridgeport, New Jersey. Specifically, Postal Service vehicles were not designed or intended for the transportation of hazardous material. Further, the Postal Service vehicles were operated by drivers who had not received appropriate training in the movement of hazardous material as required by Code of Federal Regulations, Title 49, Transportation, Part 177. This situation occurred because local Postal Service officials from New Jersey and the New York Metro Area were not aware of transportation requirements pertaining to hazardous material. Headquarters personnel told us they were aware of the situation in New Jersey, but explained they were waiting for transportation requirements to be submitted by local officials. Initially, local officials decided to use Postal Service vehicles to transport the potentially contaminated mail, and did not submit requirements to headquarters. After headquarter's officials discovered this situation, they directed local officials to stop using Postal Service vehicles for transporting mail to the irradiation facility in order to ensure compliance with the Code of Federal Regulations. We believe that confusion or misunderstanding about hazardous material transportation requirements could be avoided by instructing area and local officials on relevant Postal Service policy.

Recommendation 1. We recommend the vice president, Networks Operations Management, issue guidance to all facilities on what steps to take if contaminated mail needs transportation.

Management's Comments. Management agreed with the finding and recommendation and attached a letter addressed to the managers, Operations Support, and managers, Distribution Networks, providing specific instructions on the steps to take if they have contaminated mail that needs transportation in their area. Management noted that the letter was mailed to the areas on February 6, 2002.

Evaluation of Management's Comments. Management's comments are responsive to our recommendation. We believe the actions taken should correct the issues identified in our report.

Criminal Background Screening Would Improve Security. The Postal Service did not require criminal background screening for contract drivers transporting mail potentially contaminated with anthrax. Postal Service officials stated that they did not require the contractor to comply with Postal Service policy in management instruction PO-530-91-8, Screening Mailhandling Contract Employees, which restricts use of personnel with criminal records. Postal Service officials stated that they did not require compliance with this requirement because the contractor specializes in moving hazardous material and must meet strict requirements of the Department of Transportation. We reviewed the Code of Federal Regulation, Title 49 – Transportation, Chapter III – Federal Motor Carrier Safety Administration, Department of Transportation, and determined motor carriers are required to investigate drivers' employment and driving records, but not their criminal background. In our opinion, criminal background screening will help ensure the safety and security of the mail.

Recommendation 2. We recommend the vice president, Purchasing and Materials, require criminal background checks for all contract drivers transporting mail for irradiation.

Management's Comments. Management agreed with the intent of the recommendation but discussed circumstances to be considered. They explained they followed United States Department of Transportation guidelines when they contracted for transportation of anthrax contaminated mail and that Title 49, Code of Federal Regulations does not require contract drivers transporting hazardous material to have criminal background checks—only a commercial drivers license with a special hazardous materials endorsement. However, management acknowledged that drivers delivering mail on highway contract routes are subject to screening requirements. Notwithstanding their comment, management acknowledged they were aware the United States Senate was considering an initiative to require criminal background checks for all holders of commercial drivers licenses and also stated they would refer our recommendation to the Postal Inspection Service for further guidance.

Evaluation of Management's Comments. Management's comments are responsive to our recommendation. We agree with management's statement that Title 49, Code of Federal Regulations does not require contract drivers transporting hazardous material to have criminal background checks and we acknowledged that in our draft report. However, we also noted management's comment that drivers transporting mail on highway contract routes are subject to screening requirements. While we believe mail potentially contaminated with anthrax is properly classified as hazardous material, we also believe it is still mail, and consequently, should receive the same protection as mail that has not been contaminated. We also feel the extraordinary circumstances associated with national security since September 11, 2001, warrant additional security, and that requiring criminal background checks would enhance public confidence in the Postal Service.

Detention Charges Incurred. The Postal Service spent \$181,000 between October 24 and November 14, 2001, on trailers waiting to be loaded at the Brentwood and Lima facilities. This situation occurred because the Postal Service initially overestimated the number of trailers needed and because it did not know its initial transportation requirements. Consequently, trailers were detained at the facilities waiting to be loaded. A clause in the contract for transporting mail authorized a charge of \$15 for every 15 minutes a vehicle was delayed or detained. As a result, detention charges of \$181,000 were incurred. We noted that the Postal Service quickly identified the excess requirements and took action to reduce the number of trailers.

Recommendation 3. We recommend the vice president, Purchasing and Materials, continue to monitor requirements for additional contracts to transport mail for irradiation to minimize unnecessary costs.

Management's Comments. Management agreed with the intent of the recommendation, acknowledged \$181,000 in detention charges, cited unprecedented circumstances, and stated they had taken appropriate action to manage cost. They also explained that they had already established objectives to improve the purchasing process and to strengthen requirement planning for the transportation of contaminated mail.

Evaluation of Management's Comments. Management's comments are responsive to our recommendation. We believe the actions taken and planned should correct the issues identified in our report.

We appreciate the cooperation and courtesies provided by your staff during our review. If you have any questions or need additional information, please contact Joe Oliva, director, Transportation and Delivery, at (703) 248-2100 or me at (703) 248-2300.

Ronald K. Stith
Assistant Inspector General
for Core Operations

cc: Patrick R. Donahoe
Richard J. Strasser, Jr.
J. Dwight Young
Anthony M. Pajunas
John R. Gunnels

APPENDIX. MANAGEMENT'S COMMENTS

PAUL VOGEL
MAIL SUBJECT: Response to Draft Management Advisory



February 6, 2002

Ronald K Slith
Assistant Inspector General
Core Operations
1735 N. Lynn Street
Arlington, VA 22209-2020

Attention: Joyce Hanson
Director, Audit Operations and Follow-up

SUBJECT: Response to Draft Management Advisory - Transportation of Anthrax
Contaminated Mail (Report Number TD-MA-02-DRAFT)

Attached is a response to the subject management advisory. I appreciate the opportunity to work with you and your staff to develop a meaningful report. We concur with the recommendation concerning improperly transported contaminated mail.

Should you require additional information, please contact Tony Pajunas, manager, Logistics at (202) 268-4948.

A handwritten signature in black ink, appearing to read "Paul Vogel".

Paul Vogel

Attachment

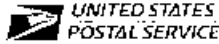
cc:
Mr. Bishop
Ms. Duchek
Mr. Moose
Mr. Pajunas
Ms. San Luis
Mr. Young

4/26/02 DRAFT 12/27/02
MAIL SUBJECT: TD-MA-02-001
JPC 085 0563
Tel: (202) 268-6251
www.usps.gov

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Recommendation 1. We recommend the Vice president, Network Operations Management, issue guidance to all facilities on what steps to take if contaminated mail needs transportation.

We agree with the finding and recommendation. Attached to this document is a letter addressed to the Managers, Operations Support (Area) and Managers, Distribution Networks (Area) providing specific instructions on the steps that they need to take if they have contaminated mail that needs transportation in their area. This letter is being mailed to the areas on February 6.



February 6, 2002

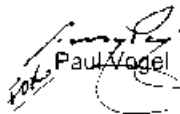
MANAGERS, OPERATIONS SUPPORT (AREA)
MANAGERS, DISTRIBUTION NETWORKS (AREA)

SUBJECT: Transporting Contaminated Materials

The Office of the Inspector General released the findings of a Management Advisory concerning the transportation of Anthrax contaminated mail. The Management Advisory recommended that the Postal Service issue guidance to all postal facilities on the proper transportation of contaminated mail.

Because every incident is unique, it is not possible to provide a single comprehensive strategy addressing each situation that may arise. Therefore, if a situation should occur where the removal of contaminated materials from a facility within your area is necessary, we ask that you contact headquarters, Logistics for specific instructions. For technical assistance regarding the transportation process, direct your questions to George Moose at 202-268-4382 or Darrin Bishop at 202-268-4497. Questions regarding obtaining proper transportation tailored to your situation should be directed to James Young at 202-268-4377 or Teri San Luis at 202-268-5263.

Please ensure that this information is disseminated to all plant managers and managers, transportation.


Paul Vogel

UNITED STATES
POSTAL SERVICE
WASHINGTON, DC 20504

NATIONAL MAIL TRANSPORTATION PURCHASING



February 6, 2002

RONALD K. STITH

THRU: KEITH STRANGE *KS* FEB 07 2002

SUBJECT: Transportation of Anthrax Contaminated Mail (Report Number TD-MA-02-DRAFT)

This is written in response to the Draft Management Advisory - Transportation of Anthrax Contaminated Mail (Report Number TD-MA-02-DRAFT). We have completed the review of the referenced advisory. While we agree with the intent of the recommendations, we have a different perspective on the specific recommendations and offer the following comments:

Recommendation 2: We recommend the vice president, Purchasing and Materials, require criminal background checks for all contract drivers transporting mail for irradiation.

Response to Recommendation 2

While we agree with the intent of this recommendation, there are other circumstances to be considered. The USPS contracted with FedEx Custom Critical to transport hazardous freight that was contaminated with Anthrax. The Code of Federal Regulation, Title 49 does not require that drivers have a criminal background check. Drivers transporting hazardous materials are required to have a Commercial Drivers License (CDL) with a special hazmat endorsement. The USPS did follow U.S. Department of Transportation guidelines for transporting Infectious Substances Affecting Humans (Bacillus Anthracis), UN2814, and packaged it in accordance with the requirements of Hazard Class, Division 6.2 materials. The vehicles were properly placarded and transported the material in accordance with Title 49 requirements.

USPS *Interim Guidelines for Sampling, Analysis, Decontamination, and Disposal of Anthrax for U.S. Postal Service Facilities* (page 29), states that all anthrax-contaminated wastes must be shipped as freight with a Government Bill of Lading. There is no federal or postal regulation that drivers transporting this classification of hazardous freight must have a criminal background check. While these guidelines were developed with full input from the Inspection Service, we will refer the recommendation to them and ask for their consideration and further guidance.

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Additionally, there is an initiative before the Subcommittee on Surface Transportation and Merchant Marine Committee on Commerce, Science, and Transportation (under the U.S. Senate), to require Immigration and Naturalization status and criminal background checks for all holders of CDLs. This initiative was spearheaded by the American Trucking Associations, Inc. (ATA). Currently, conducting criminal background checks on potential employees is cumbersome for carriers because a national criminal information database is not available with INS and criminal background information. Motor carriers must conduct county-by-county investigations on potential employees. If Congress passes this law, criminal background checks will be conducted for all applicants for CDLs.

While the USPS has a screening process in place, it was intended for drivers who deliver mail to residences and commercial businesses on established highway contract routes. It was not intended for the transportation of freight carried under a GBL. The USPS Mail Security Task Force developed a summary of mail security best practices used by the mailing industry. It includes using trucking companies that are fully insured and certified by and registered with the U.S. Department of Transportation. Such practices do not require criminal background checks for drivers. The supplier was hired to transport hazardous material destined for Lima, OH - not mail for delivery to postal customers or facilities as is contemplated under the standard mail transportation contracts.

Recommendation 3: We recommend the vice president, Purchasing and Materials, continue to monitor requirements for additional contracts to transport mail for irradiation to minimize unnecessary costs.

Response to Recommendation 3

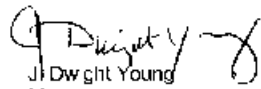
We agree with the intent of this recommendation and have taken appropriate actions to manage cost. It is true that detention costs for the period October 24 to November 14, 2001, amounted to \$181,000. These costs were not solely attributed to the overestimation of the requirements. Another reason for the delay was the State of Ohio initially refused to allow the shipments to be unloaded. Even though the state does not require a hazardous materials permit, it requested that the USPS contact the state troopers and have them escort the trucks to the Titan facility. Again, this was an unprecedented event, related to the Anthrax biochemical warfare, and was unforeseen by the USPS. As stated in the Draft Management Advisory - Transportation of Anthrax Contaminated Mail (Report Number TD MA-02-DRAFT), the USPS "quickly identified the excess requirements and took action to reduce the number of trailers." USPS also responded to the needs of the State of Ohio immediately. Purchasing and Materials had already established customer service objectives to improve the purchasing process and to strengthen requirements planning. We will continue to apply these objectives in the transportation of contaminated mail and to purchases for the irradiation process.

In summary, as stated by President George Bush, bioterrorism attacks through the mail are evidence of an "unprecedented war."¹ The USPS rapidly adopted a number of measures to protect employees, contract employees and the public, including new mail screening technology and purchasing protective gear (i.e., masks and gloves recommended by the CDC). The USPS provided educational information to residences, employees and businesses pertaining to how to handle the mail safely. It moved swiftly to award a service contract to sanitize the mail.

¹ *uspsnewsbreak p.m.*, October 26, 2001, 4 p.m. Published by Public Affairs & Communications, Washington, DC

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Putting these measures in place has resulted in costs to the company. However, we will continue to be proactive in protecting the public and USPS employees, yet also purchase needed products and services in as cost effective way as we can under the circumstances.



J. Dwight Young
Manager
National Mail Transportation Purchasing

cc: Mr. Donahoe
Mr. Strasser
Mr. Gunnels
Mr. Pajunas