

# Hazardous Waste Management at Postal Service Vehicle Maintenance Facilities

## AUDIT REPORT

Report Number 23-091-R24 | November 3, 2023



**Waste  
Storage  
Area**



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# Highlights

## Background

Postal Service employees use a variety of hazardous materials in their daily activities that generate hazardous waste, which is subject to strict federal laws and regulations related to its proper management and disposal. Vehicle maintenance facilities (VMF) generate hazardous waste as part of their normal operations. The waste is stored in central and satellite accumulation areas, aboveground storage tanks, and local storage for universal waste. Effective management of hazardous waste and related emergency response equipment is critical in reducing the risk of exposure that can cause damage to the environment and human health.

## What We Did

Our objective was to assess the Postal Service's effectiveness at managing hazardous waste and emergency response equipment at VMFs. We conducted site observations of hazardous waste and emergency response equipment at 16 VMFs designated by state-specific regulations as large quantity generators of hazardous waste. These 16 VMFs are all located in California and Massachusetts. Also, we visited three additional judgmentally selected VMFs in these two states and interviewed Postal Service Headquarters officials, VMF management, and employees.

## What We Found

Opportunities exist to improve the Postal Service's hazardous waste program and the maintenance of emergency response equipment at the 19 VMFs visited. We found management did not (1) consistently follow procedures on storing, identifying, and handling hazardous waste; (2) effectively maintain emergency eyewash and shower equipment; or (3) place designated smoking areas for employees in locations 25 feet or more away from buildings.

## Recommendations

We recommended management implement oversight procedures to verify (1) weekly and monthly hazardous waste inspections are performed; (2) applicable VMF personnel complete the required annual hazardous waste training; and (3) weekly testing and monthly/annual inspections of emergency eyewash and shower equipment are performed. We also recommend management (4) provide applicable training on testing and inspecting emergency eyewash and shower equipment, as required in relevant Maintenance Management Orders to responsible personnel; and (5) enforce existing policy for designated smoking areas to be more than 25 feet from oil storage or other operations involving flammable liquids or gases.

# Transmittal Letter



OFFICE OF INSPECTOR GENERAL  
UNITED STATES POSTAL SERVICE

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November 3, 2023

**MEMORANDUM FOR:** RONNIE J. JARRIEL  
SENIOR VICE PRESIDENT, FACILITIES AND FLEET MANAGEMENT  
  
DANE A. COLEMAN  
VICE PRESIDENT, PROCESSING AND MAINTENANCE OPERATIONS

A handwritten signature in black ink, reading "Alan S. MacMullin", is centered below the recipient names.

**FROM:** Alan S. MacMullin  
Deputy Assistant Inspector General  
for Finance, Pricing, and Human Capital

**SUBJECT:** Audit Report – Hazardous Waste Management at Postal Service Vehicle  
Maintenance Facilities (Report Number 23-091-R24)

This report presents the results of our audit of Hazardous Waste Management at Postal Service Vehicle Maintenance Facilities.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Lazerick Poland, Director, Human Capital Management, or me at 703-248-2100.

Attachments

cc: Postmaster General  
Corporate Audit Response Management

# Results

## Introduction/Objective

This report presents the results of our self-initiated audit of Hazardous Waste Management at Postal Service Vehicle Maintenance Facilities (Project Number 23-091). Our objective was to assess the Postal Service's effectiveness at managing hazardous waste and emergency response equipment at vehicle maintenance facilities (VMF). See [Appendix A](#) for additional information about this audit.

## Background

Postal Service employees use a variety of hazardous materials<sup>1</sup> in their daily activities and operations, which in some instances generates hazardous waste.<sup>2</sup> In order to maintain its fleet of approximately 216,000 delivery vehicles, the Postal Service operated 308 VMFs throughout the country as of the end of fiscal year (FY) 2022. Operations at VMFs include maintenance on these vehicles, which produces hazardous waste.

## Regulatory Oversight and Compliance Reviews

Postal Service facilities like VMFs that generate hazardous waste are subject to strict federal laws and regulations related to their proper management and disposal. In particular, the Resource Conservation and Recovery Act established federal requirements for the management of hazardous waste, while some state and local agencies impose stricter standards.<sup>3</sup>

The Postal Service's Environmental Affairs and Corporate Sustainability (EACS) Office establishes policies and procedures to ensure compliance with environmental laws and regulations.<sup>4</sup> Additionally, the Postal Service proactively develops solutions to provide its customers, employees, suppliers, and communities with a safe and healthy environment through the implementation of environmental management policies and programs. This includes

“The Postal Service proactively develops solutions to provide its customers, employees, suppliers, and communities with a safe and healthy environment through the implementation of environmental management policies and programs.”

the development of Environmental Compliance Bulletins, which document requirements for identifying, handling, storing, and monitoring hazardous waste. In the last two calendar years, the Postal Service's EACS Office updated or reviewed 137 of the 141 (97 percent) bulletins.

The EACS Office also conducts Environmental Compliance Reviews, which are periodic assessments of Postal Service operations, equipment, and systems. The reviews are used to assess compliance with environmental laws and regulations, Postal Service policies, and training requirements. The EACS Office prioritizes sites based on compliance risk, with high priority sites undergoing a review at least every three years. VMFs have been identified as high priority sites; therefore, they are on a three-year review cycle.

## Hazardous Waste Storage and Inspections

As part of their normal operations, VMFs generate hazardous waste, which is stored in central and satellite accumulation areas (see [Figure 1](#)), aboveground storage tanks, and local storage for universal waste. Specifically:

1 A hazardous material is any article or substance designated by the U.S. Department of Transportation as being capable of posing an unreasonable risk to health, safety, and property during transportation. Handbook EL-812, *Hazardous Material and Spill Response*, Section 41, What are Hazardous Materials, October 2017.  
2 A hazardous waste is defined as a waste with properties that make it dangerous or capable of having a harmful effect on human health or the environment. Hazardous waste is generated from many sources, ranging from industrial manufacturing process wastes to batteries and may come in many forms, including liquids, solids, gases, and sludges. *Learn the Basics of Hazardous Waste* <http://www.epa.gov/hw/learn-basics-hazardous-waste>.  
3 According to Postal Service policy, all Postal Service facilities must comply with all applicable federal, state, and local environmental laws and regulations. The state and local requirements may be more stringent than the federal requirements. *Administrative Support Manual*, Section 691, Policy and Section 693.3, State and Local Laws and Regulations, February 2023.  
4 *Administrative Support Manual 13*, Section 694, Environmental Management and Compliance Program, February 2023.

- Central accumulation areas are for the storage of hazardous waste containers prior to shipment to an off-site disposal location.
- Satellite accumulation areas are for temporary storage of small quantities of hazardous waste at or near the area or process where the waste is first generated.
- Aboveground storage tanks are used to store fluid products and waste, such as motor oil, gasoline, diesel fuel, heating oil, and antifreeze.
- Local storage is used to store universal waste consisting of materials that are common,<sup>5</sup> including certain batteries; lamps (light bulbs); mercury-containing equipment, such as thermometers, thermostats, and electrical switches; aerosol cans; and pesticides.

Facility management must establish routine maintenance and inspection programs to monitor central and satellite accumulation areas, the condition of aboveground storage tanks, and the storage of universal waste.

### Emergency Equipment

Useable emergency response equipment is critical if hazardous waste is unexpectedly released into the work environment. This includes emergency eyewash and shower equipment, which is necessary for the urgent treatment of an employee’s eyes or body. Additionally, spill kits, which are used for the containment and clean-up of a hazardous waste spill, generally contain personal protective equipment, absorbent materials, and waste disposal supplies.

### Hazardous Waste Management Training

Environmental compliance training, which includes hazardous waste management, is required by applicable federal, state, and local laws and regulations and Postal Service policy. Environmental compliance training courses are maintained in the Postal Service’s corporate-wide learning management information system, HERO.<sup>6</sup> Facility management is responsible for ensuring employees receive required environmental compliance training based on their responsibilities. The corporate

Environmental Training Matrix details environmental compliance training requirements and lists required courses, the typical employee audience for each course, and the associated training frequency.

## Figure 1. Types of Hazardous Waste Storage Areas

### Central Accumulation Area



Source: Site visit to Fall River VMF on May 23, 2023.

### Satellite Accumulation Area



Source: Site visit to Boston VMF on May 25, 2023.

<sup>5</sup> Universal waste is defined in 40 CFR 273.9 by the United States Environmental Protection Agency.

<sup>6</sup> An integrated, multi-faceted application for Human Resources services.



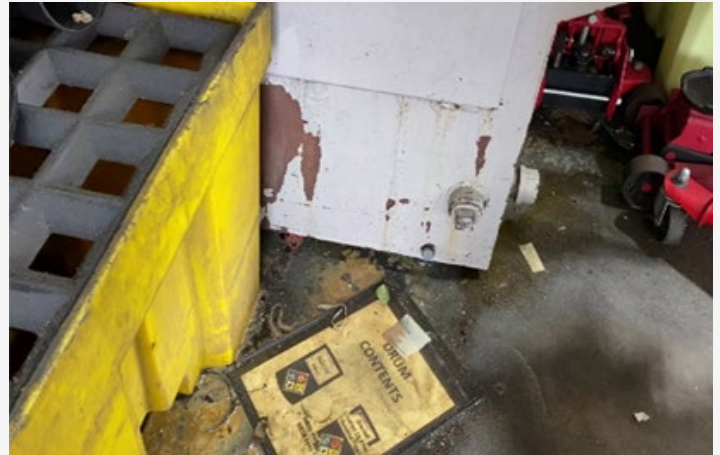
## Findings Summary

Opportunities exist to improve the Postal Service's hazardous waste program at the 19 VMFs visited. Although the EACS Office updated or reviewed 97 percent of the Environmental Compliance Bulletins in the last two calendar years, management at the VMFs visited did not consistently follow the environmental management policies in these bulletins. Additionally, VMF and maintenance operations management did not effectively maintain emergency eyewash and shower equipment. Finally, VMF management did not place designated smoking areas for employees in locations 25 feet or more away from buildings.

### Finding #1: Hazardous Waste Practices

VMF management did not consistently follow procedures for storing, identifying, and handling hazardous waste. Specifically, management at eight (or 42 percent) of 19 VMFs did not maintain central or satellite accumulation areas in good order and free of leaks, spills, or corrosion. We observed conditions that posed a risk to health, safety, and environmental exposure at one of the eight VMFs. At the one VMF, we observed leaks and spills from unidentifiable sources throughout the central accumulation area, including an area that contained unidentified sludge, garbage, and debris (See Figure 2). At the seven other VMFs, we saw evidence of small accumulations of hazardous waste leaks and spills in the area surrounding the storage of hazardous waste containers.

Figure 2. Spill and Leakage in the Central Accumulation Area at the Pomona VMF



Source: Site visit to Pomona VMF on May 10, 2023.

Also, we found the following hazardous waste deficiencies during our site visits (See Figure 3). Specifically,

- All 19 (or 100 percent) VMFs had container labels that were missing, incomplete, or illegible. Labels are important to ensure proper identification of contents or to indicate when the container becomes full.
- 16 (or 84 percent) VMFs' personnel did not keep containers closed to prevent accidental spills.
- Nine (or 47 percent) VMFs had containers in poor condition (showing evidence of damage, leakage, bulging, rusting or other deterioration) and did not ensure proper storage of hazardous waste.

These items represent some of the deficiencies that occurred most frequently; however, for all deficiencies identified, see [Appendix B](#).

### Figure 3. Examples of Hazardous Waste Deficiencies

Waste Fuel Without Proper Label



Source: Site visit to San Jose VMF on May 2, 2023.

Metal Shaving Container Not Covered



Source: Site visit to Torrance VMF on May 10, 2023.

Corroded and Rusted Aboveground Storage Tank



Source: Site visit to Lynn VMF on May 24, 2023.

According to Postal Service policies, VMF management is required to perform weekly inspections of central accumulation areas and monthly inspections of satellite accumulation areas,<sup>7</sup> aboveground storage tanks,<sup>8</sup> and local storage for universal waste.<sup>9</sup> Also, VMF management is responsible for ensuring their employees complete all required Postal Service environmental training annually based on their responsibilities, which is intended to ensure all proper policies and procedures surrounding the identification, handling, storage, and monitoring of hazardous waste are followed.<sup>10</sup>

These hazardous waste deficiencies occurred because Fleet Management did not have effective procedures to verify that policies requiring weekly and monthly inspections and annual training were followed. Instead, for oversight, management relied on Environmental Compliance Reviews, which are not conducted often enough for efficient monitoring of environmental compliance. High priority sites, such as VMFs, undergo an Environmental Compliance Review to assess compliance with environmental laws and regulations at least every three years. Because VMFs are on a three-year cycle, relying on the Environmental Compliance Reviews for oversight is insufficient to timely rectify any deficiencies identified.

Hazardous waste that is not properly managed poses a serious threat to the environment and human health. When VMF management does not follow hazardous waste procedures, there is an increased risk that hazardous waste spills or leaks could occur and go undetected. Specifically, hazardous waste can cause damage to surface and ground water supplies and have serious short- and long-term effects on the body, including eye and skin irritation, chemical burns, and difficulty breathing. Further, the Postal Service could violate U.S. Environmental Protection Agency, Occupational Safety and Health Administration requirements, state and local laws and regulations, and be subject to fines and or penalties for non-compliance.

<sup>7</sup> Environmental Compliance Bulletin, *Hazardous Waste Management – Large Quantity Generators (LQG) & Small Quantity Generators (SQG)*, September 2022.

<sup>8</sup> Environmental Compliance Bulletin, *Aboveground Storage Tank Management*, September 2022.

<sup>9</sup> Environmental Compliance Bulletin, *Universal Waste Management*, September 2022.

<sup>10</sup> *Administrative Support Manual 13*, Sections 694.5, Training and Awareness and 697.7, Installation Heads February 2023.



### Recommendation #1

We recommend the **Senior Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify that weekly and monthly hazardous waste inspections are performed, as required.

### Recommendation #2

We recommend the Senior **Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify that vehicle maintenance facility personnel responsible for handling and storing hazardous waste complete hazardous waste annual training, as required.

## Finding #2: Emergency Eyewash and Shower Equipment

VMF and Maintenance Operations management did not effectively maintain emergency eyewash and shower equipment at the VMFs visited to prevent or reduce eye and or skin irritation in the event of an exposure to hazardous waste. Specifically, emergency equipment was not always serviced, and weekly testing and monthly/annual inspections were not always completed, as required. We observed various types of eyewash equipment that included 32 equipment units plumbed with an external source of water, 17 self-contained units with specified amounts of liquid contained in a storage tank, and 39 squeeze bottle style eyewash containers. We also observed 29 shower equipment units, all of which were plumbed with an external source of water.

At 17 (or 89 percent) of the 19 VMFs, we found one or more of the following deficiencies, see Figure 4:

- Water flowing from the eyewash and shower equipment was either low-flowing, dirty brown with the appearance of contamination, or did not drain after activation.
- Equipment was covered in dust, dirt, and debris or blocked by doors or other items.
- Protective eyewash covers were missing from equipment, or covers did not come off when activated, which could prevent timely usage.
- Self-contained eyewash containers and squeeze bottles held unusable contents that expired between October 2020 and September 2022.

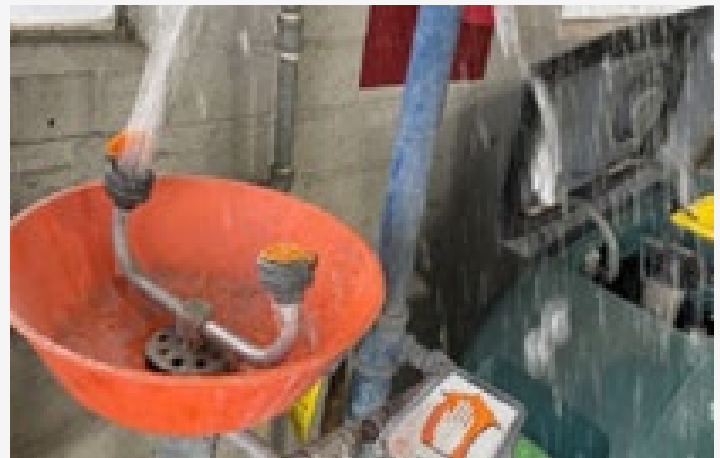
## Figure 4. Examples of Under Maintained Emergency Eyewash and Shower Equipment

### Dirty Plumbed Eyewash Equipment



Source: Site visit to Torrance VMF on May 10, 2023.

### Malfunctioning Plumbed Eyewash Equipment



Source: Site visit to Pomona VMF on May 10, 2023.

### Plumbed Shower Equipment With Rusty Water



Source: Site visit to Pomona on VMF May 10, 2023.

According to Postal Service policy, plumbed emergency eyewash and shower equipment must be tested weekly<sup>11</sup> and inspected annually.<sup>12</sup> Self-contained eyewash stations and contents must be inspected monthly. Specifically, responsible personnel are required to perform the following weekly maintenance tasks on plumbed emergency eyewash and shower equipment:

- Activate the unit to ensure water flow is effective and continuous and that water drains from the equipment.
- Ensure access is unobstructed and the nozzle and fluids are protected against contaminants and freezing.
- Verify protective eyewash covers are properly positioned, clean, intact, and come off when eyewash is activated.

Also, responsible personnel are required to perform monthly maintenance tasks on self-contained eyewash stations, including ensuring the expiration date has not passed, verifying the container and seals are intact and in good working order, and wiping down the container and immediate area.<sup>13</sup>

These emergency eyewash and shower deficiencies occurred because there were no oversight procedures in place to ensure VMF and maintenance personnel were performing the weekly testing and monthly/annual inspections, as required. Maintenance Operations management stated training was not necessary because of the simplicity of the weekly testing requirements. Additionally, one VMF employee stated they were given verbal instructions on how to perform the testing and inspection of the emergency eyewash and shower equipment. However, they were not made aware, or provided a copy, of the policy that details the specific weekly and monthly tasks for proper maintenance of emergency eyewash and shower equipment. The identified deficiencies are likely to continue without (1) applicable training in accordance with existing policy, and (2) communicating the importance of regularly

testing and inspection of emergency eyewash and shower equipment.

Furthermore, even though industry standards exist for the annual inspections,<sup>14</sup> during our site visits and observations in May 2023, there were no Postal Service policies in place detailing the specific items that needed to be inspected annually. VMF personnel stated they believed the weekly testing, conducted by allowing water to run from the eyewash and shower equipment, satisfied the annual inspection requirement. However, as of July 12, 2023, management took corrective action to develop and implement policies that detail procedures for conducting the annual inspection of emergency eyewash and shower equipment.<sup>15</sup> As a result, employees now have a preventative maintenance checklist to guide them in conducting the annual inspections. Therefore, we did not make a recommendation for this specific issue.

When VMF and Maintenance Operations management do not ensure employees properly maintain, test, and inspect emergency eyewash and shower equipment, the risk of severe injury increases when employees are exposed to hazardous materials or waste and need to use the equipment in an emergency.

### Recommendation #3

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Senior Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify weekly testing and monthly/annual inspections of emergency eyewash and shower equipment are performed, as required.

### Recommendation #4

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Senior Vice President, Facilities and Fleet Management**, provide applicable training on testing and inspecting emergency eyewash and shower equipment to responsible personnel, as required in relevant Maintenance Management Orders.

<sup>11</sup> Maintenance Management Order MMO-008-20, October 13, 2020.

<sup>12</sup> Maintenance Management Order MMO-003-23, July 12, 2023.

<sup>13</sup> Maintenance Management Order MMO-008-20, October 13, 2020.

<sup>14</sup> American National Standards Institute (ANSI) ANSI-Z358.1: Safety Equipment Checklist.

<sup>15</sup> Maintenance Management Order MMO-003-23, July 12, 2023.

### Finding #3: Designated Smoking Areas

VMF management placed designated smoking areas within 25 feet of VMF buildings, which allowed employees to smoke near operations involving hazardous waste or other flammable materials. Specifically, five (or 26 percent) of 19 VMFs visited had designated smoking areas adjacent to buildings, in close proximity to hazardous waste central accumulation areas, and next to roll-up bay doors. (See Figure 5.)

“Five (or 26 percent) of 19 VMFs visited had designated smoking areas adjacent to buildings, in close proximity to hazardous waste central accumulation areas, and next to roll-up bay doors.”

According to Postal Service policies and procedures, smoking outdoors on Postal Service property is limited to designated smoking areas and smoking is not permitted within 25 feet of oil storage or other operations involving flammable liquids or gases. Also, smoking is not permitted in any room, work area, or section of a building leased or owned by the Postal Service, which applies to enclosed and open-air platforms, ramps leading from those platforms, and public lobbies.<sup>16</sup> Furthermore, local managers, with input from employee representatives, may decide whether to permit smoking in designated outdoor locations on Postal Service property.<sup>17</sup>

The smoking related deficiencies occurred because VMF management did not enforce policies on the location of designated smoking areas. Specifically, management stated the facilities have been there a long time, and designated smoking areas were in place prior to their employment at the facility.

When management does not ensure smoking is kept at least 25 feet from buildings, there is an increased risk that flammable materials, including hazardous

waste, could ignite and cause injury to employees and fire and smoke damage to buildings.

### Figure 5. Examples of Improper Designated Smoking Area Locations at VMFs

Designated Smoking Area Located Adjacent to Hazardous Waste Central Accumulation Area



Source: Site visit to Torrance VMF on May 10, 2023.

Designated Smoking Area Located Adjacent to Building and Near Roll-up Access Door



Source: Site visit to Boston VMF on May 25, 2023.

### Recommendation #5

We recommend the **Senior Vice President, Facilities and Fleet Management**, enforce existing policy for designated smoking areas to be more than 25 feet from oil storage or other operations involving flammable liquids or gases.

<sup>16</sup> EL-803, *Maintenance Employee's Guide to Safety*, Section II – Fire Prevention and Protection, July 2020.

<sup>17</sup> *Employee and Labor Relations Manual*, Section 882.1, Buildings, September 2022.



## Management's Comments

Management agreed with findings 1 and 2 and recommendations 1, 2, 3, and 5. Management disagreed with finding 3 and recommendation 4.

Regarding finding 3, management stated that Postal Service policy does not prohibit designated smoking areas adjacent to buildings or next to roll-up doors. They reiterated that the policy prohibits smoking within 25 feet of gasoline pumps, gas and oil storage tanks, spray paint operations, or other operations involving flammable liquids or gases. They contended that only two of the five VMFs identified in the finding had potential deficiencies, verifying they had designated smoking areas and cigarette collection containers within 25 feet of oil storage and a water-based degreaser. According to management, they abated the potential policy violations at the two VMFs and asserted that the three other cited deficiencies regarding designated smoking areas were within Postal Service policy.

Regarding recommendation 1, management will develop and incorporate a required electronic checklist to validate that weekly and monthly inspections are performed. The target implementation date is December 31, 2023.

Regarding recommendation 2, management will work with the Training & Development office to make required training courses mandatory in HERO where they can then be validated for completion. The target implementation date is July 31, 2024.

Regarding recommendation 3, management will develop a reporting requirement for VMFs co-located with a plant to verify weekly testing and annual inspections of emergency eyewash and shower equipment are completed. Also, management has developed a safety checklist for stand-alone VMFs that can be used to monitor compliance with weekly testing and annual inspections of emergency eyewash and shower equipment. The target implementation date is November 30, 2023.

Regarding recommendation 4, management stated two Maintenance Management Orders (MMOs) detailing the step-by-step process for completing weekly testing and annual inspections are already targeted at maintenance-capable sites, and the

policies cover VMFs that are co-located with a plant and maintained by Building Maintenance staff.

Regarding recommendation 5, management agreed that existing policy should be enforced and that they are currently in compliance with the recommendation. In subsequent communication, management provided pictures and additional information demonstrating how the five facilities' designated smoking areas were either already in compliance with Postal Service policy, policy violations were remedied, or designated smoking areas were moved or removed. The target implementation date was October 31, 2023.

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

## Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendations 1, 2, 3 and 5, and the corrective actions should resolve the issues identified in the report. However, the OIG considers management's comments unresponsive to recommendation 4 and will seek agreement through the audit resolution process.

Regarding management's disagreement with finding 3, management provided the OIG with subsequent communication containing pictures and additional information demonstrating how they believed the five VMFs were either already in compliance with Postal Service policy or that they abated the potential policy violations. Two of the facilities with potential policy violations were abated and the corrective actions taken for these two sites satisfies the intent of the recommendation.

For the remaining sites, management provided photos of a tape measure at one site showing aboveground storage tanks containing chemicals in a lubrication room were slightly over 25 feet away from the designated smoking area. The other two sites had designated smoking areas within 25 feet of operations involving flammable liquids or gases, which is against Postal Service policy. This included a smoking area adjacent to a roll-up door and another adjacent to the building. Normal VMF operations involving the usage and storage of hazardous materials and hazardous waste were on

the other side of the roll-up door and walls and is therefore not in compliance with Postal Service policy. However, even though management disagreed with the finding, they moved the smoking area that was near the roll-up door and removed the smoking area that was adjacent to the VMF building. These actions satisfy the intent of Recommendation 5.

Regarding management's disagreement with recommendation 4, management did not address the reason for their disagreement with training responsible employees on the required testing and inspection of emergency eyewash and shower equipment, as documented in relevant Maintenance Management Orders. Instead, management detailed the issuance of Maintenance Management Orders (MMO-008-20 and MMO-003-23), which include the step-by-step processes for weekly testing and annual inspections of emergency eyewash and shower equipment. Issuance of the MMOs does not constitute training personnel responsible for the weekly testing and annual inspections. In addition, the MMOs cover VMFs that are co located with a plant but do not address training personnel responsible for the testing and inspections at stand-alone VMFs that are not co located with a plant.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 2, 3, and 4 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. We view the disagreement on recommendation 4 as unresolved and plan to pursue it through the audit resolution process. We consider recommendation 5 closed with the issuance of this report.

# Appendices

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# Appendix A: Additional Information

## Scope and Methodology

We reviewed and analyzed hazardous waste records and documents, observed hazardous waste and emergency response equipment at 19 vehicle maintenance facilities in May 2023, and reviewed and analyzed hazardous waste training data in HERO for the period FYs 2020 through 2022. To accomplish our objective, we:

- Reviewed Environmental Protection Agency, Occupational Safety and Health Administration, and Postal Service environmental and safety regulations, policies, and procedures related to hazardous waste.
- Observed storage conditions of hazardous waste areas and containers and conditions of emergency response equipment.
- Interviewed Postal Service Headquarters management for Environmental Affairs, Fleet Management, Maintenance Operations, and Safety.
- Interviewed VMF management and designees responsible for the management of hazardous waste.
- Reviewed supporting documentation as it related to hazardous waste.
- Visited 19 VMFs in California and Massachusetts, representing all 16 of the VMFs designated as large quantity generators of hazardous waste based on state-specific regulations, and three additional judgmentally selected VMFs designated as small and very small quantity generators of hazardous waste based on state-specific regulations and the Resource Conservation and Recovery Act.

We conducted this performance audit from March 2023 through November 2023 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 October 4, 2023, and included their comments, where appropriate.

In planning and conducting the audit, we obtained an understanding of the hazardous waste management internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and determined that the following components were significant to our audit objective: control activities, information and communication, and monitoring.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of training data by applying logical tests to the data file and comparing the data to employee data from other systems. We determined that the data were sufficiently reliable for the purposes of this report.

## Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>Aboveground Storage Tanks</i>	Assess the Postal Service's effectiveness at managing aboveground storage tanks.	22-078-R22	9/15/2022	N/A

# Appendix B: Hazardous Waste Deficiencies

Deficiency VMF management did not:	Anaheim VMF	Hayward Aux VMF	Huntington Beach VMF	La Puente VMF	Los Angeles VMF	ML Sellers Aux VMF (San Diego)	Oakland VMF	Pomona VMF	Sacramento VMF	San Bernardino VMF	San Francisco VMF	San Jose VMF	Stockton VMF	Torrance VMF	West Sacramento Aux VMF	Boston VMF	Brockton VMF	Fall River VMF	Lynn VMF	Number of VMFs
	California															Massachusetts				
Hazardous Waste Storage																				
Affix hazardous waste labels to containers.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	19
Complete hazardous waste labels on containers as required.	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X		X	X	17
Ensure personnel kept containers closed when not actively placing waste into the container.			X	X	X	X		X	X	X	X	X	X	X	X		X		X	14
Maintain central/satellite accumulation areas in good order and free of leaks, spills or corrosion.		X	X	X				X	X	X			X	X						8
Maintain containers in good condition.	X	X		X	X			X			X			X	X					8
Use proper containers to hold hazardous waste.	X	X		X	X						X			X	X					7
Mark full containers with the date the container became full.				X	X	X		X	X		X	X								7
Separate incompatible wastes into separate containers.	X	X			X				X				X		X					6
Have spill kits located at or near central accumulation areas.					X						X	X				X				4
Have spill kits available in the vicinity of aboveground storage tanks.							X	X						X					X	4
Clean/empty the accumulation of liquid in secondary containment units.								X									X			2
Provide adequate berm or secondary containment system to contain leaks or spills.									X							X				2
Maintain the satellite accumulation area's floor surface is free from cracks or gaps.								X	X											2
Maintain a containment device or berm to keep containers of incompatible waste separated.																X			X	2
Properly dispose or recycle universal waste within 365 days from the accumulation start date.				X															X	2
Properly label an aboveground storage tank containing hazardous waste.																	X	X		2
Move containers from satellite to central accumulation areas with three days of the container becoming full.												X								1
Maintain universal waste containers in good condition.																X				1
Maintain integrity of aboveground storage tank.																			X	1
<b>Total deficiencies identified at each VMF</b>	<b>5</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>8</b>	<b>4</b>	<b>3</b>	<b>9</b>	<b>8</b>	<b>4</b>	<b>6</b>	<b>6</b>	<b>5</b>	<b>7</b>	<b>6</b>	<b>6</b>	<b>4</b>	<b>3</b>	<b>7</b>	



# Appendix C: Management's Comments



10/27/2023

JOHN CIHOTA  
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Hazardous Waste Management at Postal Service Vehicle Maintenance Facilities (Audit 23-091-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report *Hazardous Waste Management at Postal Service Vehicle Maintenance Facilities*.

**Finding #1:** Management agrees with the OIG's findings regarding Hazardous Waste Practices

**Finding #2:** Management agrees with the OIG's findings regarding Emergency Eye Wash and Shower Equipment

**Finding #3:** Management disagrees with the OIG's findings regarding Designated Smoking Areas. The OIG cited "five (or 26 percent) of 19 VMFs visited had designated smoking areas adjacent to buildings, in close proximity to hazardous waste central accumulation areas, and next to roll-up bay doors." However, Postal policy does not prohibit smoking areas adjacent to buildings or next to roll-up doors. In EL-814 Section III F, Postal policy states that smoking is prohibited within 25 feet of gasoline pumps, gas and oil storage tanks, spray paint operations, or other operations involving flammable liquids or gases. When the correct policy is applied, two VMFs had potential deficiencies; one VMF was found to have cigarette collection containers within 25 feet of potential oil storage; one VMF had a designated smoking area 17 feet from water-based degreaser in an enclosed containment pallet. Both VMFs have abated the potential policy violations. The other cited deficiencies regarding designated smoking areas were within Postal policy.

Following are our comments on each of the recommendations.

**Recommendation #1:**

We recommend the **Senior Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify that weekly and monthly hazardous waste inspections are performed, as required.

**Management Response/Action Plan:**

Management agrees with this recommendation. Management is developing and incorporating an electronic checklist that will be required to complete to validate the appropriate weekly and monthly inspections are being completed.

**Target Implementation Date:** 12/31/2023

**Responsible Official:**  
Director, Fleet Management

**Recommendation #2:**

We recommend the **Senior Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify that vehicle maintenance facility personnel responsible for handling and storing hazardous waste complete hazardous waste annual training, as required.

**Management Response/Action Plan:**

Management agrees with this recommendation. Management will work with Training & Development to ensure required training classes are made mandatory in HERO where completion can be validated.

**Target Implementation Date:** 07/31/2024

**Responsible Official:**

Director, Fleet Management

**Recommendation #3:**

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Senior Vice President, Facilities and Fleet Management**, develop and implement oversight procedures to verify weekly testing and monthly/annual inspections of emergency eyewash and shower equipment are performed, as required.

**Management Response/Action Plan:**

Management agrees with this recommendation.

HQ Maintenance Operations will develop a reporting requirement for plant-maintained VMFs to verify weekly testing and annual inspections of emergency eyewash and shower and equipment routes are completed, as required. Plumbed and self-contained eyewashes are already inspected weekly per MMO-008-20.

Fleet Management has developed a safety checklist, which includes eyewash stations and showers. Fleet will monitor its non-Plant maintained VMFs for compliance via the checklist.

**Target Implementation Date:** 11/30/2023

**Responsible Official:** Executive Manager, Maintenance Policy, Programs & Support;  
Director, Fleet Management

**Recommendation #4:**

We recommend the **Vice President, Processing and Maintenance Operations**, and the **Senior Vice President, Facilities and Fleet Management**, provide applicable training on testing and inspecting emergency eyewash and shower equipment to responsible personnel, as required in relevant Maintenance Management Orders.

**Management Response/Action Plan:**

Management disagrees with this recommendation.

The Vice President, Processing and Maintenance Operations disagrees with this recommendation. MMO-008-20, Guidelines for Creating Detailed Local Building Equipment Emergency System Checklists, which covers the step-by-step process to complete the weekly inspections on both the eyewash and shower units, and MMO-003-23, Guidelines for Creating Detailed Local Building and Building Equipment Preventive Maintenance Checklists, which covers the step-by-step process for completing the annual inspection, are already targeted at maintenance-capable sites. These policies cover any VMF that is collocated with a Plant and maintained by their Building Maintenance staff.

Target Implementation Date: N/A

Responsible Official: N/A

**Recommendation #5:**

We recommend the **Senior Vice President, Facilities and Fleet Management**, enforce existing policy for designated smoking areas to be more than 25 feet from oil storage or other operations involving flammable liquids or gases.

**Management Response/Action Plan:**

Management agrees with this recommendation.

Management agrees that existing policies should be enforced, but states that management is already in compliance with this recommendation. The Postal Service will provide evidence of the enforced policy to OIG.

Target Implementation Date: 10/31/2023

Responsible Official:  
Director, Fleet Management

E-SIGNED by RONNIE J JARRIEL  
on 2023-10-25 17:52:18 EDT

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Ron Jarriel  
Senior Vice President, Facilities and Fleet Management

cc: Corporate Audit Response Management



# OFFICE OF INSPECTOR GENERAL

UNITED STATES



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1735 North Lynn Street, Arlington, VA 22209-2020  
(703) 248-2100

For media inquiries, please email [press@uspsig.gov](mailto:press@uspsig.gov)  
or call (703) 248-2100