OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

Survey of Environmental Compliance and Sustainability

Management Advisory

December 17, 2012

Report Number HR-MA-13-001

OFFICE OF INSPECTOR GENERAL

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HIGHLIGHTS

December 17, 2012

Survey of Environmental Compliance and Sustainability

Report Number HR-MA-13-001

BACKGROUND:

The U.S. Postal Service's vision is to be a sustainability leader by building a culture of conservation. Sustainability involves harvesting or using a resource so that the resource is not depleted or permanently damaged. The Office of Sustainability is responsible for managing programs that track and report on sustainability issues and programs that impact energy or environmental compliance. In fiscal year (FY) 2011, the office identified 1,016 facilities as 'high-risk' based on various environmental factors.

Challenges exist that affect the success of these programs, including:

- The Office of Sustainability had a budget of $24 million for FY 2012. In addition to the field environmental projects funded by the office, areas and districts fund their own projects. As a result, it is difficult to centrally track costs.

- A recent policy change requires violation notices to be forwarded to the Office of Sustainability. However, those responsible for reporting violations may not be aware of the current requirements and reporting process.

In coordination with the chief Sustainability and Environmental officer, we developed and distributed a survey to personnel at a sample of high-risk facilities. The purpose of the survey was to obtain field personnel's knowledge of the Postal Service's environmental and sustainability regulatory requirements and programs to assist in assessing high-risk environmental issues.

CONCLUSION:

We received survey responses from each Postal area, with response rates ranging from 41 to 72 percent, and 50 percent overall. These included responses from plant, vehicle maintenance facility, network distribution center, and Post Office personnel. We presented the survey results in four categories:

- Environmental Management Process.
- Environmental Compliance.
- Training.
- Facility Deactivation.

We plan to use the survey results to guide future reviews of environmental compliance and sustainability.
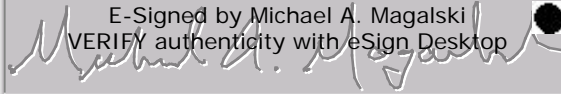
WHAT THE OIG RECOMMENDED:

The survey results are provided for informational purposes only. We did not verify the responses, formulate conclusions or offer any recommendations.

Link to review the entire report

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

December 17, 2012

MEMORANDUM FOR: THOMAS G. DAY
CHIEF SUSTAINABILITY OFFICER

E-Signed by Michael A. Magalski
VERIFY authenticity with eSign Desktop

FROM: Michael A. Magalski
Deputy Assistant Inspector General
for Support Operations

SUBJECT: Management Advisory – Survey of Environmental
Compliance and Sustainability
(Report Number HR-MA-13-001)

This management advisory presents the results of our Survey of Environmental Compliance and Sustainability (Project Number 12YG030DA000).

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

Attachments

cc: Ronald A. Stroman
Corporate Audit and Response Management

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Introduction

This report presents the results of our self-initiated Survey of Environmental Compliance and Sustainability (Project Number 12YG030DA000). This was a coordinated effort between the U.S. Postal Service Office of Inspector General (OIG) and the U.S. Postal Service Office of Sustainability. Our objective was to obtain field personnel's[1] knowledge of the Postal Service's environmental and sustainability regulatory requirements and programs to assist in assessing high-risk environmental issues. This survey addresses strategic and operational risks. See Appendix A for additional information about this audit.

The Postal Service's Office of Sustainability is responsible for managing programs that track and report on sustainability issues and programs that impact energy or environmental compliance. Challenges exist that affect the success of these programs, including:

- The Office of Sustainability had a budget of $24 million for fiscal year (FY) 2012 to fund mail irradiation and sustainability programs, including facility and vehicle fleet energy reduction and development of environmental policies and risk management. Also, in addition to the field environmental projects funded by the Office of Sustainability, areas and districts fund their own projects. As a result, it is difficult to centrally track costs.

- A recent policy change requires all environmental notices of violation (NOVs)[2] to be forwarded to the Office of Sustainability. However, those responsible for reporting NOVs may not be aware of the current requirements and reporting process.[3]

In FY 2011, the Postal Service Office of Sustainability identified 1,016 facilities as high-risk based on various environmental factors.[4] The list included plants, vehicle maintenance facilities (VMF), network distribution centers (NDC), post offices, and stations.

We developed and distributed this survey to personnel at a judgmentally selected sample of these high-risk facilities to obtain a better understanding of field personnel's knowledge of the Postal Service's environmental and sustainability regulatory requirements and programs to assist in assessing high-risk environmental issues.

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[1] Field personnel include Postal Service plant, VMF, NDC, post office, and station personnel.
[2] Warning letters or notices of non-compliance issued to the Postal Service from a local, state, or federal agency for violation of an environmental regulation.
[3] Management distributed the policy directly to areas and districts and published it in *Postal Bulletins* dated October 20, 2011, May 3, 2012, and October 18, 2012.
[4] We did not obtain detailed information regarding the risk assessment used to identify these facilities.

Conclusion

Overall, of the 829 surveys we sent to personnel at judgmentally selected facilities identified as high-risk, we obtained a 50 percent response rate. The results are provided for informational purposes only. We did not verify the responses, formulate conclusions, or offer any recommendations. We plan to use survey results to guide future reviews of environmental compliance and sustainability. See Appendix D for the Field Environmental Survey issued.

As shown in Table 1, we received responses from personnel at high-risk facilities in each area, with response rates ranging from 41 to 72 percent.

Table 1. Survey Statistics

Area	Surveys Issued	Number of Respondents	Response Percentage
Capital Metro	47	34	72%
Eastern	134	86	64
Great Lakes	94	50	53
Northeast	109	46	42
Pacific	62	28	45
Southern	209	86	41
Western	174	83	48
Total	**829**	**413**	**50%**

Table 2 shows the breakdown of who responded to the 829 surveys we issued.

Table 2. Responses by Facility Type

Facility Type	Count	Percentage
Plant	145	35%
VMF	168	41
NDC	11	3
Post Office	70	17
Station[5]	19	5
Total	**413**	**100%**

Table 3 shows that the majority of the respondents have been in their position between 1 and 5 years, with 36 percent in their position for 6 years or more, and only 13 percent for less than 1 year.

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[5] Stations are subordinate units to Post Office that provide one or more services at sites more convenient to customers.

Table 3. Years in Position

Area	How Long Have You Been in Your Position?							
	Less than 1 Year		1-5 Years		6-10 Years		11 or More Years	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Capital Metro	2	6%	20	59%	6	18%	6	18%
Eastern	15	18	39	46	19	22	12	14
Great Lakes	6	12	23	46	13	26	8	16
Northeast	9	20	15	33	13	28	9	20
Pacific	5	18	11	39	4	14	8	29
Southern	12	14	51	59	11	13	13	15
Western	6	7	50	61	14	17	12	15
Total	**55**	**13%**	**209**	**51%**	**80**	**19%**	**68**	**17%**

We presented the results of the survey in four categories, including:

- Environmental Management Process.
- Environmental Compliance.
- Training.
- Facility Deactivation.

Environmental Management Process

The environmental management process at Postal Service facilities includes properly reporting environmental NOVs. As shown in Table 4, few respondents were aware of any NOVs or citations.[6] The highest positive response rate was in the Pacific Area, where about 29 percent of the respondents indicated they were aware that their facility received NOVs or related citations.

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[6] All but three of those sites that reported receiving NOVs indicated that abatement had resolved the issue and there were no repeat violations.

Table 4. Environmental NOV Awareness

Are You Aware of Any NOVs, Notices to Correct or Any Form of Citation or Observations That Your Facility Has Received as a Result of Non-compliance With an Environmental Regulation?							
	No		Yes		No Answer		Total
Area	Count	Percent	Count	Percent	Count	Percent	
Capital Metro	31	91%	3	9%	0	0%	34
Eastern	77	90	9	10	0	0	86
Great Lakes	48	96	2	4	0	0	50
Northeast	41	89	5	11	0	0	46
Pacific	20	71	8	29	0	0	28
Southern	84	98	2	2	0	0	86
Western	81	98	1	1	1	1	83
Total	382	92%	30	7%	1	0.24%	413

Table 5 shows that the majority of survey respondents indicated they were aware of the requirement to report NOVs to the manager, Regional Environmental Compliance and Sustainability.

Table 5. NOV Reporting Requirement Awareness

Are You Aware of the Requirement to Report All NOVs to the Manager, Regional Environmental Compliance and Sustainability?							
	No		Yes		No Answer		Total
Area	Count	Percent	Count	Percent	Count	Percent	
Capital Metro	8	24%	25	74%	1	3%	34
Eastern	22	26	64	74	0	0	86
Great Lakes	22	44	28	56	0	0	50
Northeast	8	17	38	83	0	0	46
Pacific	9	32	19	68	0	0	28
Southern	39	45	46	53	1	1	86
Western	35	42	48	58	0	0	83
Total	143	35%	268	65%	2	0.5%	413

However, Table 6 shows that the follow-up question regarding who they actually contact produced varied results, including Safety Kleen,[7] Facilities Service Office (FSO)/Facility Single Source Provider (FSSP), regulatory agencies, and others in the Postal Service, such as the manager, Post Office Operations.

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[7] A private company that provides environmental services and products, such as collecting and recycling oil, performing industrial cleaning, and handling industrial waste.

Table 6. Environmental Points of Contact

Who Do You Contact for Environmental Related Issues or Concerns?									
	Capital Metro	Eastern	Great Lakes	North-east	Pacific	Southern	Western	Total	
Survey Responses									
Environmental Compliance/Risk Mitigation Specialist-Regional West/East	9	35	1	9	15	34	33	136	**33%**
Corporate Sustainability Initiatives - Project Specialist	10	20	28	20	0	0	1	79	**19**
Area Environmental Coordinator	2	1	4	0	5	4	11	27	**7**
Energy Specialist	1	0	0	0	0	9	0	10	**2**
Facility or Maintenance Manager/Supervisor	0	8	4	3	2	6	12	35	**8**
District Safety - Safety Kleen	3	4	1	4	0	11	4	27	**7**
Area/District Office	5	9	7	7	2	9	8	47	**11**
Other	3	1	3	2	3	9	10	31	**8**
N/A	1	8	2	1	1	4	4	21	**5**
Total	**34**	**86**	**50**	**46**	**28**	**86**	**83**	**413**	**100%**

Table 7 shows that, overall, a majority of the respondents maintain records on NOVs.

Table 7. Environmental Record Maintenance

Do You Maintain Records Related to Environmental NOVs?							
	No		Yes		No Answer		Total
Area	**Count**	**Percent**	**Count**	**Percent**	**Count**	**Percent**	
Capital Metro	8	24%	21	62%	5	15%	**34**
Eastern	26	30	60	70	0	0	**86**
Great Lakes	15	30	32	64	3	6	**50**
Northeast	12	26	33	72	1	2	**46**
Pacific	5	18	23	82	0	0	**28**
Southern	38	44	46	53	2	2	**86**
Western	40	48	42	51	1	1	**83**
Total	**144**	**35%**	**257**	**62%**	**12**	**3%**	**413**

The percentage of respondents who indicated that they maintain records on NOVs is much greater than those who indicated that they were aware of any NOVs or other citations issued for their facility.

Environmental Compliance

Regulatory agencies (see Table 9) may periodically perform inspections and visits at Postal Service facilities to ensure environmental compliance. To maintain compliance, facilities conduct various projects for which personnel must obtain funding. The majority of respondents indicated they had not received an inspection or visit in the last year. Also, survey respondents indicated environmental compliance projects are funded by a variety of methods, such as eBuy and FSSP.[8] Respondents reported more than $849,000 of environmental compliance expenditures in FY 2011.

Regulatory Visits and Inspections

The majority of respondents (84 percent) indicated that the facility where they are located had not received an inspection or visit in the last year. As shown in Table 8, the Pacific Area had the highest proportion of respondents (54 percent) indicating that they were aware of an inspection or visit at their respective facilities.

Table 8. Inspections

Have You Received Any Other Inspections or Visits by an Environmental Regulatory Agency in the Last Year?							
	No		**Yes**		**No Answer**		**Total**
Area	**Count**	**Percent**[9]	**Count**	**Percent**	**Count**	**Percent**	
Capital Metro	30	88%	4	12%	0	0%	34
Eastern	75	87	11	13	0	0	86
Great Lakes	43	86	5	10	2	4	50
Northeast	36	78	9	20	1	2	46
Pacific	12	43	15	54	1	4	28
Southern	77	90	8	9	1	1	86
Western	75	90	7	8	1	1	83
Total	**348**	**84%**	**59**	**14%**	**6**	**1%**	**413**

For survey respondents who answered "Yes" to whether their respective facilities had received any inspections or visits by an environmental regulatory agency in the last year, we provided the opportunity in a follow-up question to list the names of the agencies that conducted the inspections or visits. Sixty-one survey respondents provided a response listing one or more contractors or agencies. As depicted in Table 9, they largely reflected various environmental regulatory agencies, including the Environmental Protection Agency (EPA) and various state and local agencies. See Appendix C for a glossary of acronyms cited. Other agencies listed included local utilities, the Wisconsin Department of Commerce, and the New Hampshire Department of Transportation. Some respondents also indicated that their facility had received an

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[8] The Postal Service's facility response line that consolidates all facility repair and alteration requests. Area facility service offices coordinate and fund repairs.
[9] All percentages have been rounded to the nearest whole percentage. As a result, percentages in the Pacific, Western, and Total rows do not sum to exactly 100 percent.

inspection or visit by either a Postal Service environmental staff member, or the URS Corporation, Cardno ATC Associates, or HDR, firms that the Postal Service contracts with to perform environmental compliance reviews at Postal Service facilities.

Table 9. Agencies or Contractors Conducting Inspections

Area	Agencies or Contractors Cited
Capital Metro	Postal Environmental Team
	District Department of the Environment (Washington, DC)
	Department of Health and Environmental Control (DHEC)
	South Carolina DHEC
Eastern	URS Corporation
	EPA, Multimedia Enforcement
	WV Department of Environmental Protection (DEP)
	Pennsylvania EPA Department of Water Management
	Lexington Fayette Ground Water
	Bureau of Underground Storage Tank Regulations
	City of Cleveland Department of Public Safety
Great Lakes	Cardno ATC Associates
	WI Department of Commerce
	Michigan Department of Environmental Quality
	Metropolitan Sewer District
	Indiana Department of Environmental Management
Northeast	Middlesex County Recycling
	Massachusetts DEP
	New York DEP
	URS Corporation
	New Hampshire Department of Transportation
Pacific	URS Corporation
	Storm water inspectors
	Certified Unified Program Agency/Fire Department
Southern	Environmental Compliance/Risk Mitigation Specialist
	Florida DEP
	EPA
	Houston Public Works
Western	City of Reno
	Clean Air
	Cardno ATC Associates
	EPA
	URS Corporation
	HDR
	Arizona State Underground Storage Tank Inspector

Funding

Survey respondents provided a wide range of responses to the question regarding how their respective facilities fund environmental compliance projects. The majority of survey respondents (137) indicated that they submit a request for funding through the Postal Service's eBuy system. An additional 31 respondents indicated they use a combination of methods, including eBuy, depending on the issue. Other responses included local funding charged to the facility finance number, through the area and/or district office, or through the FSSP. Thirty-eight respondents indicated that the survey question was not applicable to their respective facility and 10 respondents indicated they did not know how their facility funds environmental compliance projects.

We also asked about total compliance cost by category for FY 2011. As depicted in Table 10, 125 respondents provided environmental compliance costs totaling $849,791. The totals by area range between about $35,000 and $264,000.

Table 10. Environmental Compliance Costs

Area	Number of Responses	Total Compliance Costs[10]
Capital Metro	10	$34,931
Eastern	28	264,397
Great Lakes	20	69,740
Northeast	22	149,659
Pacific	13	79,796
Southern	31	87,586
Western	18	163,682
Total	**142**	**$849,791**

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[10] Costs are based on survey responses only. We did not validate this information for accuracy.

Finally, to determine the extent the FSSP facility response line is used as an alternative source of funding, we asked survey respondents whether they report environmental projects to the FSSP. As shown in Table 11, the majority of survey respondents (54 percent) indicated that they do not report environmental projects to the FSSP.

Table 11. FSSP Utilization

Do You Call in Environmental Projects to FSSP?						
	No		**Yes**		**No Answer**	**Total**
Area	**Count**	**Percent**	**Count**	**Percent**	**Count**	**Percent**	
Capital Metro	18	53%	14	41%	2	6%	**34**
Eastern	49	57	36	42	1	1	**86**
Great Lakes	18	36	31	62	1	2	**50**
Northeast	24	52	22	48	0	0	**46**
Pacific	18	64	7	25	3	11	**28**
Southern	55	64	27	31	4	5	**86**
Western	43	52	38	46	2	2	**83**
Total	**225**	**54%**	**175**	**42%**	**13**	**3%**	**413**

Training

Environmental training requirements vary based on state and local jurisdiction, roles and responsibilities, and facility operations and systems. Overall, respondents reported approximately $126,000 for funding environmental compliance training.

There were 230 respondents that provided an opinion regarding who needed environmental knowledge and skills training, including:

- Maintenance and building managers or supervisors (21 percent).
- VMF, auto, custodial staff or lead technicians (14 percent).
- All employees and all managers (20 percent).

The remaining 45 percent believe that all staff handling environmental issues, those handling hazardous waste or recycling, postmasters, customer service managers, facility managers, new hires, and others all need training.

Seventy-five percent of respondents indicated they know where to get training. The sources respondents used to obtain training included:

- Learning Management System (LMS) or LMS specialist.
- Department of Health and Environmental Controls.
- Indiana Department of Environmental Management.
- Postal Employee Development Center.
- National Center Employee Development.
- Environmental or sustainability representative or area/district coordinator (to inquire about training).
- Online sustainability website.

- Safety Kleen.
- Safety Office.
- Video or stand-up talks.

These same respondents provided the annual cost of environmental training for their facility. As shown in Table 12, the Northeast, Southern, and Eastern areas comprised the majority of the environmental training costs.

Table 12. Environmental Training Costs

Area	Training Costs[11]
Capital Metro	$7,144
Eastern	17,524
Great Lakes	10,275
Northeast	45,607
Pacific	8,400
Southern	34,674
Western	2,460
Total	**$126,084**

Facility Deactivation

When disposing of Postal Service-owned, excess properties and buildings, the Postal Service is responsible for adhering to environmental regulations. Personnel at facilities being deactivated must check for environmental hazards to ensure environmental risks are minimized. As shown in Table 13, 33 of the 413 respondents (8 percent) indicated their facility had been identified for deactivation.

Table 13. Facility Deactivation

Area	Number of Facilities
Capital Metro	1
Eastern	4
Great Lakes	9
Northeast	4
Pacific	3
Southern	8
Western	4
Total	**33**

However, the majority also indicated they had not performed the required actions. For example, only seven of 33 respondents (21 percent) indicated they had identified and inventoried environmental equipment in facilities that needed to be deactivated. Also, only 12 respondents (36 percent) indicated they had identified all hazardous or regulated waste, unused chemicals, paints, and other potentially hazardous materials for proper disposal.

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[11] Costs are based on survey responses only. We did not validate this information for accuracy.

Appendix A: Additional Information

Background

In early FY 2011, the Postal Service restructured its environmental compliance office and created the Office of Sustainability. It has five reporting units:

- **Corporate Sustainability Initiatives** is responsible for leading corporate sustainability initiatives including corporate recycling initiatives, Lean Green Team engagement, Cradle-to-Cradle certification, customer and supplier engagement initiatives, and voluntary corporate programs.

- **Energy Initiatives** is responsible for leading the development of corporate energy conservation and renewable energy goals and programs, National Performance Assessment reporting for the energy index, federally mandated energy reporting, maintaining corporate sustainability data warehouse, and managing the corporate utility management system.

- **Environmental Compliance and Risk Management** leads development of corporate programs and polices related to environmental compliance, assurance reporting, environmental compliance audits, corporate risk and compliance mitigation projects, corporate climate change adaption plans, and National Environmental Policy Act reviews.

- **Regional Sustainability Initiatives (West and East)** teams serve as liaisons to state and regional regulators. Regional teams also provide area, district, and facility managers with support to develop area plans, conduct compliance and energy performance reviews; and coordinate with area staff to conduct on-site environmental compliance audits. They also track and coordinate area and district compliance mitigation efforts, wide recycling initiatives, energy conservation efforts, alternative fuel use, Lean Green Team engagement, and other corporate green initiatives.

Objective, Scope, and Methodology

Our objective was to obtain field personnel's knowledge of the Postal Service's environmental and sustainability regulatory requirements and programs to assist in assessing high-risk environmental issues. We coordinated with the Postal Service Office of Sustainability to accomplish our objective. Specifically we:

- Obtained the FY 2011 list of 1,016 Postal Service facilities identified as high-risk from the Postal Service Office of Sustainability. The list included plants, VMF, NDCs, post offices, and stations.

- Grouped the list of high-risk facilities by area and identified a survey respondent for each facility.

- Coordinated with the chief Sustainability and Environmental officer to develop questions for the electronic environmental field survey. The survey contained questions focusing on environmental compliance components including tracking NOVs, deactivation readiness, funding, and management.

- Distributed pilot surveys to 47 judgmentally selected Capital Metro Area personnel to test the effectiveness of survey questions. We obtained 34 responses from the 47 surveys (72 percent) distributed.

- Formally distributed the survey to personnel at 782 additional judgmentally selected facilities in the remaining six areas.

We conducted this survey from July through December 2012 in accordance with the Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluations.* We discussed our observations and conclusions with management on November 20, 2012, and included their comments where appropriate.

The data presented in this report are based on survey responses compiled electronically. We did not verify the responses or formulate conclusions. We tested the reliability of the data by cross-indexing data fields between system-generated reports and discussing the results with OIG officials knowledgeable of the server. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this review.

Appendix B: Summary of Most Frequent Suggestions

We provided an opportunity for respondents to provide suggestions for improvements and best practices in various areas, including:

- How to improve the Postal Service's environmental compliance program.
- How to improve the NOV reporting process.
- The best way to isolate and track environmental compliance costs.

We summarized the most frequent comments received.

Overall Improvements

Of the 413 respondents, 83 provided comments on training, professional environmental coordinators, communications, and compliance audits and inspections as follows:

Training

- Many employees that had training in the past have changed positions, retired, or otherwise left. Replacements do not have or always receive the training they need in order to properly manage environmental programs.

- In the past, facility managers were trained by local environmental specialists. Since this has changed, new managers struggle to stay in compliance.

- More structured training is needed by the environmental group.

- Resume routine periodic training and conduct annual refresher training.

- More site specific training and training on national, state, and local compliance.

- Better training material should be provided as it pertains to the scope of work being conducted by responsible managers.

Professional Environmental Coordinators

- Return the lost Environmental Compliance/Risk Mitigation positions recently reduced by headquarters.

- Hire the experts back to maintain environmental compliance. Give this important issue back to the experts.

- Keep an environmental specialist available as an advisor or someone at the district or area level whose sole job is to work with the field to ensure compliance.

- Restore consistency and continuity. For example, there have been four different environmental compliance specialists over the Oklahoma District. There has also been restructuring and job eliminations.

- There needs to be a professional environmental coordinator position readily available to assist field personnel. Local management or VMFs cannot handle the added responsibility, especially in locations with instability in the staffing.

Communications

- Need more details on the actual environmental structure.

- Simplify the process and make it easier to track environmental issues.

- Send out contact list including all environmental contact names and telephone numbers.

- Maintain better documentation for employees changing office/positions. The duties and responsibilities for new or transitioning personnel are unclear when going to a new facility.

- Need more communications concerning environmental responsibilities.

- Start with upper level management knowing what is needed for approvals and authorizations. Do not allow contractors the option to email managers and submit quotes asking for approvals.

Compliance Audits and Inspections

- Develop an easy to follow checklist for compliance. Eliminate the usual 50-page inspection that takes days to complete and repeats the same questions over and over.

- Implement a local and national help desk. Questions for environmental issues of compliance, rules, laws, regulations are very difficult to get approved by the local environmental department.

- Conduct regular audits (by area environmental coordinators).

- Provide more required compliance checklists as reminders.

- Reinstate annual inspections; previously conducted annual or quarterly environmental inspections, but with the elimination of environmental positions that has now stopped.

- Seek out environmental reviews to verify that responsiveness is appropriate and that paid contractors are performing the proper tasks. Also conduct follow up as required; oversight must be corrected.

- Ensure environmental compliance for the right reasons, including costly non-compliance issues.

- Ensure that resources are available to correct identified environmental non-compliance issues in an efficient manner.

Notices of Violation Reporting Process

Of the 413 respondents, only 33 (8 percent) provided suggestions regarding the NOV reporting process, summarized as follows:

- Provide experts and contacts.

- Provide training, standard operating procedure, checklists or guides to help with NOV process.

- Miscellaneous - To include shared information on NOVs between sites to reduce repeat violations and update information more.

Tracking Costs

Of the 413 responses, 245 provided suggestions about how to best track environmental costs, summarized as follows:

- Establish unique account identifier codes for environmental related costs.

- Centrally locate site-specific records and maintain environmental spreadsheets and logs.

- Designate environmental staff at the headquarters, area, district, and/or local level, or FSO staff to track costs.

- Utilize data systems such as Environmental Tool Kit, eBuy, Enterprise Data Warehouse, Electronic Maintenance Activity Reporting and Scheduling, or develop new system.

Appendix C: Glossary of Agency and Contractor Acronyms

BUSTR	Bureau of Underground Storage Tank Regulations. BUSTR is a bureau of Ohio's Fire Marshal's Office.
Cardno ATC Associates	Cardno ATC Associates has a national presence that provides specialized expertise to the real estate, petroleum, water/wastewater, and mining industries.
CUPA	Certified Unified Program Agencies. California State Senate Bill 1082 of 1993 required the Secretary of the California EPA (Cal/EPA) to establish a 'unified hazardous waste and hazardous materials management' regulatory program (Unified Program). Currently, there are 83 CUPAs in California. The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs.
DDOE for Washington, DC	District Department of the Environment. DDOE is the leading authority on energy and environmental issues affecting the District of Columbia.
DHEC	South Carolina Department of Health and Environmental Control.
EPA	U.S. Environmental Protection Agency.
EPA, Multimedia Enforcement	The Multimedia Enforcement Program is an Environmental Protection Agency enforcement program that involves more than one media (air, water, or land) or more than one law (Clean Air Act, Clean Water Act, etcetera). For example, a multimedia enforcement action occurs when EPA reviews air and water issues during one inspection, or when violations of the Resource Conservation and Recovery Act and Safe Drinking Water Act are combined into one administrative order. Multimedia enforcement actions can also be comprehensive reviews of all applicable laws at one facility and taking one enforcement action to resolve all violations.
HDR	A global employee-owned firm providing architecture, engineering, consulting, construction, and related services through our various operating companies.
IDEM	Indiana Department of Environmental Management.
Massachusetts DEP	Massachusetts Department of Environmental Protection.
Michigan DEQ	Michigan Department of Environmental Quality.
MSD Sewer Company	Metropolitan Sewer District of greater Cincinnati (known as MSD or MSDGC) serves the wastewater removal and treatment needs of residents and businesses in Hamilton County, OH.
New Hampshire DOT	New Hampshire Department of Transportation.
Pennsylvania EPA	Pennsylvania Department of Environmental Protection.

URS	URS was incorporated in 1957 as Broadview Research. The name Broadview Research was changed to United Research Services in 1968, and later shortened to URS. URS Corporation is a leading provider of engineering, construction and technical services for public agencies and private sector companies around the world. The Postal Service contracts URS to perform environmental compliance reviews at select Postal Service facilities.
WI Department of Commerce	Wisconsin Department of Commerce.
WV DEP	West Virginia Department of Environmental Protection.

Appendix D: Field Environmental Survey

Area:	Fiscal Year:
District:	Date:
Name of the person completing this survey: Title: Contact Phone: Facility Name: Date Occupied	
	Finance No.
Facility Manager's Name:	Facility Type (Plant, VMF, NDC, PO, Station, Branch,)
Address: _____	Do you have an UST or AST (circle one)

General Questions

1. How long have you been in your current position?

2. Who do you contact for environmental related issues or concerns?

Environmental Compliance - Tracking of Notices of Violation

3. Are you aware of any Notices of Violation (NOV), notice to correct or any form of citation or observations that your facility has received as a result of noncompliance with an environmental regulation?

4.   If yes, please explain:

5. Have you had any repeat violations?

6. What is your process for reporting environmental NOVs?

7. Are you aware of the requirement to report all NOVs to the Manager, Regional Environmental Compliance and Sustainability?

8. Do you maintain records related to Environmental NOV's?

9. Do you have any suggestions for improving the NOV process?

10. Have you received any other inspections or visits by an environmental regulatory agency in the last year?

11. Name of the agency.

12. Date of inspection.

13. Outcome of inspection

Environmental Compliance – Funding and Management

14. How do you fund environmental compliance projects and issues at your facility? (examples: storage tank permits and registrations, air permits, waste generator permits, hazardous waste removal, fixing storage tanks, storm water outfall sampling, sampling of drums and waste, waste sludge removal, etc.)

15. What was your total compliance cost by category for FY 2011?

16. Who authorizes payment for the above types of environmental costs?

17. In your opinion what is the best way to isolate and track the costs related to environmental compliance at a local and National level?

18. Do you call in environmental projects to the Facilities Department's FSSP Response Line?

19. If yes, how many environmental compliance projects have you called into FSSP since October 2011? Provide a listing:

20. Do you know who needs to get environmental compliance training at your facility?

21. If yes, who needs to get environmental training?

22. Do you know where to get environmental compliance training?

23. Could you provide the annual cost of training related to environmental compliance?

24. Do you have any suggestion to improve the Postal Service environment compliance program?

Environmental Compliance - De-activation Readiness

25. Is this facility targeted for de-activation? Yes/No
    (Stop if answer is No)

26. Have you identified and inventoried environmental equipment such as any storage tanks, old water fountains, refrigerators, window a/c that will need to be closed or de-activated properly?

27. If yes, have you identified and inventoried environmental equipment to be closed or deactivated, please list.

28. Have you identified all your hazardous or regulated waste, unused chemicals, paints, and other potentially hazardous materials that will need to be properly disposed?

29. If yes, you have identified all potentially hazardous materials to be properly disposed, please list below.

30. Have you identified environmental records that will need to be properly managed, transferred, or archived?

31. If yes, you have identified environmental records etc., can you provide locations of where they are?

32. Do you have any other special environmental issues that need to be properly evaluated prior to de-activation (wetland, retention pond, mural, historic property, etc.)

33. If yes, you have other special environmental issues that need to be properly evaluated prior to de-activation, please list below.

34. What do you believe the Office of Inspector General should review concerning the areas of energy, environment compliance, and/or sustainability?