U.S. Office of Personnel Management Office of Merit Systems Oversight and Effectiveness Classification Appeals and FLSA Programs

Chicago Oversight Division 230 South Dearborn Street, DPN 30-6 Chicago, Illinois 60604

Job Grading Appeal Decision Under Section 5346 of Title 5, United States Code

Appellants: [Appellant]

Agency classification: Boiler Plant Operator

WG-5402-9

Organization: Department of Veterans Affairs

Health Care System

[subordinate organization]

[city and state]

OPM decision: Boiler Plant Operator

WG-5402-9

OPM decision number: C-5402-09-02

/s/

Frederick J. Boland
Classification Appeals Office

Classification Appeals Officer

April 17, 2000

Date

As provided in section S7-8 of the Operating Manual, Federal Wage System, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. There is no right of further appeal. This decision is subject to discretionary review only under conditions specified in section 532.705(f) of title 5, Code of Federal Regulations (address provided in the Introduction to the Position Classification Standards, appendix 4, section H).

Decision sent to:

[appellant] [manager]

[address] Manager, HR Management Dept. (05)

[city and state] Medical Center

Department of Veterans Affairs

[attorney] [address] city and state]

[address] Mr. Ronald E. Cowles

[city and state] Deputy Assistant Secretary for Human Resources Management Department of Veterans Affairs

Washington, DC 20420

Introduction

The appellant is assigned to job 6316A, Boiler Plant Operator, WG-5402-9, located at the Department of Veterans Affairs Health Care System, [subordinate organization], [city and state].

The appellant agrees that the job description accurately reflects his duties and responsibilities, but questions its grading and the propriety of assigning a job to the WG-9 grade level when the job grading standard describes only two levels, WG-8 and WG-10. The proper grading of his work is addressed in the grade determination of this decision. As the appellant notes, the Boiler Plant Operator, 5402, standard does not describe a WG-9 level. Like other job grading standards, it does not describe all possible levels at which jobs may be established. If jobs differ substantially from the skill, knowledge, or other work requirements of the grade levels described in the standard, they may warrant grading either above or below these grades based on the sound application of job grading principles.

Job Information

The appellant is one of five Boiler Plant Operators in his unit. He reports to a Boiler Plant Operator Supervisor who also supervises pipefitters, a plumber, machinists, and air conditioning mechanics. There are approximately 17 trade employees assigned to the unit.

The appellant operates and maintains a semi-automatic, gas/oil fired, high pressure steam plant consisting of three water-tube boilers and related auxiliary equipment. He monitors the overall operation of the plant to maintain steam for space heating and process use throughout the facility. Plant facilities include auxiliary equipment such as a deaerating feedwater heater, feedwater pumps, a back-up fuel system, condensate pumps, a water softening system, a domestic water booster pump system, an automated chemical feed system, an automated boiler blowdown system, and a microprocessor based control system. He adjusts controls to maintain plant efficiency and optimizes combustion and boiler stack conditions. He maintains production records and logs for overall operation of the plant. He also tests boiler water to determine chemical treatment requirements for the prevention of scale and corrosion in the boilers.

The plant also contains the pumps which pick up domestic water from the city and send it to the station water tower for distribution throughout the facility. The appellant monitors the pumps and tower water level to maintain station pressure. He also monitors the water usage of the facility in order to identify possible underground leaks as may be indicated by unusual deviations in the readings.

In the event of system or equipment failures, he initiates the call-in of personnel for emergency repairs. He isolates the problem and maintains essential station load until assistance arrives. He notifies his supervisor of actions taken at the earliest opportunity available.

Analysis and Findings

Pay System Determination

A job is exempt from the General Schedule only if the paramount requirement of the job is knowledge and experience in trades, crafts, or laboring. The primary duty for the appellant's job is to operate and maintain a high pressure steam plant consisting of three water-tube boilers and related auxiliary equipment. The chief requirement for this duty is knowledge and experience in the boiler operation trade. Consequently, the appellant's job is exempt from the General Schedule and falls under the Federal Wage System (FWS).

Code and Title Determination

An FWS job is coded to the occupation that represents the best match between the content of the job and the definitions of the various occupations. Jobs requiring the performance of work in two or more occupations are coded to the occupation that is most important for recruitment, selection, placement, promotion, or reduction-in-force purposes. This is ordinarily the occupation having the highest skill and knowledge requirements, as long as that occupation's duties are regular and recurring.

The *Boiler Plant Operator*, *WG-5402*, *Series* job grading standard, dated March 1991, covers work like the appellant's involving the operation and maintenance of single and multi-fuel water or fire tube boilers and associated auxiliary and pollution equipment. The prescribed title for jobs in the 5402 series above the WG-8 level is *Boiler Plant Operator*.

Grade Determination

FWS work is graded based on the regular and recurring duties of the job that involve the highest skill and qualification requirements, even though the duties may not be performed most of the time. Duties performed only in the absence of another employee, to meet emergency workloads, or for development are not considered regular and recurring.

A job is graded as a whole against the level of demands found at differing grades. These demands are expressed in the job grading standard as four factors: 1) skill and knowledge, 2) responsibility, 3) physical effort, and 4) working conditions. No single factor is considered by itself, but only in relation to its impact on the other factors. A job is classified to the grade that best represents the overall demands of the work.

Factor 1: Skill and Knowledge

This factor covers the nature and level of skill, knowledge, and mental application required to perform the work.

The appellant notes that he is required to convert to standby/backup equipment or fuel, isolate equipment to prevent damage, contact additional personnel for assistance, and authorize overtime. He believes these assignments equal those found at the WG-10 grade level. His job does entail

significantly greater knowledge and skill than the WG-8 grade level. It requires sufficient skill and knowledge to independently operate and maintain the boilers and auxiliary equipment at the plant and to deal with malfunctioning equipment, as well as potentially dangerous operating conditions, all without the immediate and onsite technical assistance of a higher grade Boiler Plant Operator. In contrast, WG-8 Boiler Plant Workers assist in the operation and maintenance of boilers and auxiliary equipment. Only under the direction of a boiler plant operator do they light off, operate, secure, and maintain power boilers and associated auxiliary and pollution control equipment.

However, the appellant's job does not fully meet the WG-10 grade level where, among other things, Boiler Plant Operators must have sufficient knowledge and skill to maintain efficient combustion levels and ensure compliance with air pollution laws or regulations. The WG-10 level described in the standard is based on specific types of boiler operations necessary for different fuels and skill in controlling the formation of pollutants. WG-10 boiler operation demands more exacting adjustments than WG-8 or 9 operation. It demands skill in adjusting various combustion settings to compensate for the varying qualities of fuels. It requires thorough knowledge of the chemical and physical aspects of sulfur-containing fuels (e.g., oil, coal, and lignite), the chemical reactions involved in combustion, and the relationship between fuel quality and combustion efficiency. Exacting adjustments of manual and automatic controls at the WG-10 level require practical knowledge of environmental law and thorough knowledge of the methods to control combustion and pollutants in flue emissions e.g., by controlling combustion time, stack temperature, and excess air flow. Boilers operated at this level require constant attention and significant knowledge and skill to maintain efficiency while controlling the formation of pollutants. Their operation requires thorough knowledge of pollution control equipment like electrostatic precipitators and flue-gas desulfurization systems to properly adjust, troubleshoot, and maintain the associated equipment and systems

While the appellant independently operates the boiler plant, the fuels used at the plant, i.e., natural gas and low sulfur fuel oil, do not require the exacting adjustments associated with the control systems described at the WG-10 grade level. As a result, the full range of skill and knowledge to deal with pollutants and make more demanding combustion requirements is absent from the job. Therefore, a lower level of credit is appropriate.

We evaluate this factor at the WG-9 grade level.

Factor 2: Responsibility

This factor covers the nature and degree of responsibility involved in the work, given its complexity and scope, the difficulty and frequency of judgments and decisions made, the supervisory controls, and the work instructions and technical guides used.

The appellant's work approaches the WG-10 grade level where boiler plant operators receive work assignments from a supervisor or a higher graded operator who is in charge of the facility or work shift. While the appellant is responsible for monitoring and dealing with complete boiler plant operations as at the WG-10 level, the plant which the appellant operates does not have the added complexity of multi-fuel operation requiring pollution control equipment and the attendant

decision-making requirements established at the WG-10 grade level. Therefore, since the appellant's job substantially exceeds the WG-8 grade level where there is a higher graded operator or supervisor available on each shift, but does not fully meet the WG-10 grade level, we evaluate this factor at the WG-9 grade level.

Factor 3: Physical Effort

This factor assesses the physical effort involved in the work according to its nature, degree, frequency, and duration of exertion.

Physical effort is the same for WG-8 workers and WG-10 operators alike. Since the standard does not differentiate levels, we evaluate this factor at the same level credited under knowledge and responsibility, the WG-9 level.

Factor 4: Working Conditions

This factor covers the usual hazards, physical hardships, and conditions to which workers are exposed. Exposure to unusually severe conditions (hazards, physical hardships, or working conditions) is compensated by environmental pay differentials. Related demands on skill, knowledge, and responsibility are accounted for in the standard.

Working conditions are the same at both the WG-8 and WG-10 grade levels. Since the standard does not differentiate levels, we evaluate this factor at the same level credited under knowledge and responsibility, the WG-9 level.

Special Additional Responsibilities

One additional grade may be credited to plant operator jobs at the full performance level, whether they work alone or with a small group of plant operating employees, when placed in charge of a complete plant. The operator-in-charge typically performs additional duties that are more responsible and require a significantly higher level of skill and knowledge than full performance level operators with a supervisor available to provide specific guidance and assistance.

For example, the operator-in-charge may decide to shut down a malfunctioning boiler and fire up another boiler or attempt to bypass the trouble until the problem can be fixed. Typically, the operator-in-charge has responsibility to determine what work must be done to correct the malfunction and has the authority to approve overtime or to call in off-duty maintenance personnel.

The appellant's job meets some, but not all, of the conditions required for additional credit. The hospital has contingency plans and procedures in place for steam failure and operating procedures for boiler start-up/shutdown, boiler burner operation, boiler plant emergency generator operation, and related systems operation. These significantly limit the discretion of any operator working alone on second or third shifts. Engineering SOP No. 138, Boiler Equipment or System Failure, dated September 4, 1997, establishes procedures for such operators to contact the supervisor or, if he is not available, others in the chain of command to inform them of major problems such as

damage to equipment, which provides the supervisors the opportunity to take or direct action dealing with the emergency.

Additionally, Medical Center Memorandum No. 138-2-97, Callback Emergency Repairs, dated August 25, 1997, states that for emergency work during non-administrative duty hours the Boiler Plant Operator is responsible for notifying the Manager, Facilities Support Services, and the Administrative Officer of the Day (AOD) when major utility failure occurs during non-administrative hours. The AOD at the [city] Campus is responsible for determining if the circumstances warrant the authorization of overtime to permit repair during non-administrative duty hours and the Boiler Plant Operator must call the immediate shop supervisor who determines what personnel to call.

Therefore, while the appellant has additional responsibility when working alone, it is significantly less than that outlined for additional credit under the standard. Because all the conditions associated with being operator-in-charge are not clearly met, the job may not be granted additional grade credit.

Decision

The job equates to the WG-9 level on all four factors. Therefore, it is graded properly as Boiler Plant Operator, WG-5402-9.