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

Dallas Oversight Division  
1100 Commerce Street, Room 4C22  
Dallas, TX 75242

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

**Appellants:** [appellant #1] [appellant #6]  
[appellant #2] [appellant #7]  
[appellant #3} [appellant #8]  
[appellant #4} [appellant #9]  
[appellant #5]

**Agency classification:** Packer (Fork Lift Operator)  
WG-7002-06

**Organization:** Packing Branch  
Packing & Shipping Division  
Defense District Depot  
Defense Logistics Agency  
[City, State]

**OPM decision:** Packer (Fork Lift Operator)  
WG-7002-06

**OPM Decision Number:** C-7002-06-02

/s/ Judith L. Frenzel for  
Bonnie J. Brandon  
Classification Appeals Officer

10/08/97  
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:**

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- [appellant #7]
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## **Introduction**

This position is assigned to the Packing Branch, Packing and Shipping Division, of the Defense District Depot, Defense Logistics Agency (DLA) at Tinker Air Force Base. The appellants indicate they had been classified as Packing Inspector (Hazardous Material), WG-7002-07 while they were Air Force employees. Following reduction-in-force, they were assigned to DLA to positions classified as Packer, WG-7002-06. The position was recently changed to Packer (Fork Lift Operator), WG-7002-06. This group of nine appellants question assignment to the Federal Wage System but believe that their work is comparative to the WG-6912, Materials Examiner and Identifier series at the WG-7 level. The position was appealed to the Defense Logistics Agency and the Department of Defense (DoD) Civilian Personnel Management Service (CPMS) who sustained the agency classification.

## **Job information**

The nine appellants are assigned to C4326N, a standard agency-wide position description. The purpose of the position is to perform preservation/packaging/packing of hazardous and non-hazardous material to include flammables, toxins, corrosives, explosives, and magnetics for the host Tinker AFB and other tenant organizations. The appellants receive items to be shipped, reshipped, or stored which they verify against accompanying shipping documents for correct nomenclature, code, size, color, condition, destination, etc. In accomplishing their work they prepare and process all documentation, special handling labels, shipping codes, and required safety data. They certify hazardous material for shipment for all modes of transportation. The appellants note that due credit is not given to the percentage of time they spend in certification of hazardous material duties and that only ten to twenty percent of their time is spent physically packing material.

The appellants included a copy of the Air Force WG-7002-07 Packer position in the appeal rationale for comparison. Since comparison to current standards, not to other positions, is the intended and exclusive method for classifying positions, we may not consider the classification of other positions as a basis for deciding an appeal. Each agency is delegated responsibility for the classification of its positions and is responsible for assuring intra-agency consistency, including consistency with OPM decisions. They should assure that similar positions are classified in a similar manner.

The position description of record provides an accurate description of the major duties and responsibilities of the position.

## **Occupation determination**

The first decision must be to determine the appropriate pay plan. It was determined that the paramount requirement of this position is to possess the knowledge, skills, and abilities needed in order to perform the duties related to processing customer requests for shipment of hazardous and nonhazardous materials. The appellant must be certified through formal training of the technical and certifiable aspects of packing, shipping, storing, loading/unloading, and processing hazardous materials. A passing grade on the training material is required every two years for position retention. The primary duties involved in this position are receiving, validating, consolidating, packing, and

shipping hazardous material such as toxic chemicals, pesticides, flammables, corrosives, explosives, fluids, and ammunitions. They also perform specialized packing such as classified material assuring that labels and identification markings are on containers.

A position is exempt from the General Schedule if its primary duties involve the performance of physical work which requires knowledge or experience of a trade, craft, or manual-labor nature. A position would be subject to the General Schedule, even when it requires physical work, if the position's primary duties require knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual-labor work. The appealed position requires physical work and also knowledge or experience directly related to the manual-labor nature of the job--that being the requirement of packing, handling, and shipping hazardous and non-hazardous materials. The "paramount requirement" of a position refers to essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Accordingly, the appellants are required to complete two weeks training in hazardous certification and update this certification every 24 months. Packing and hazardous certification is primary, with the latter (certification) being a phase of the packing process. These duties constitute the major function or paramount knowledge requirement for the appealed positions. In hazardous certification, the appellants properly identify the item, making certain that it matches accompanying documents, research to find out what the hazard is by looking at the characteristic of items and using the Hazardous Material Information System (HMIS) to look up information such as national stock numbers, and manufacture part numbers. The packing instructions, mode and destination are then determined . The appellants must possess an in-depth knowledge of agency, Federal, and international packing regulations, techniques, and documentation requirements. Therefore, it is determined that this position is most properly covered by the Federal Wage System.

The WG-7002 Packer standard covers non-supervisory work involving preserving and/or packing and repacking items in various types of containers in order to protect them from damage, deterioration, or corrosion during shipment and/or storage. The work requires knowledge of protective devices or techniques, packing procedures, and regulatory and safety requirements applicable to preserving, packing, labeling, storing, and shipping standard and nonstandard materials. Most work requires the incidental use of a variety of trade practices associated with support or related occupations such as forklift operating, woodworking, mechanical equipment assembly, or materials handling. Similarly, the appealed positions are related to, or associated with other related occupations.

The WG-6912 Materials Examiner and Identifier is involved in identifying, examining, classifying, accepting, and disposing of materials and equipment. They determine physical condition, adherence to product specifications, and equipment defects using shipping documents, contracts, catalogs, drawings, and related documents. Such work is usually performed in a warehouse or a property reutilization and disposal facility. Materials Examiner and Identifiers are more concerned with examining and identifying complex material and interpreting subjective material specifications prior to removal or acceptance from the system due to, for example, inconspicuous defects detected. Whereas, Packers' primary function is the visual verification of material and equipment against

accompanying documents and the proper packing of these material for outbound shipment. The appellants' job is best coded to the WG-7002 occupation.

### **Title and Standard determination**

The appellants process customer requests in order to identify needs for special packing, loading and handling, and specialized shipment of hazardous materials in accordance with pertinent Federal and other regulations. The Packer standard covers nonsupervisory work involved in preserving and/or packing and repacking equipment, parts, tools, materials and other items in various types of containers to protect them from damage, deterioration, or corrosion during shipment and storage. Use of forklift, tug, or other lifting and warehouse handling equipment are used to facilitate packing and shipping the materials described. The appealed position is appropriately titled Packer (Fork Lift Operator).

### **Grade determination**

The job grading standards for WG-7002 Packer are used for grade determination. This standard uses four factors for determining grade level, skills and knowledge, responsibility, physical effort, and working conditions and describes work at the 4,5, and 6 level.

*Skill and Knowledge:* At the WG-5 level, packers work according to established instructions requiring knowledge of a variety of preservation and packing techniques.

Grade 6 packers must have an in-depth knowledge of a wide variety of methods for processing and packing materials. Packers at the grade 6 level also have a detailed knowledge of documentation requirements, international and Federal packing and shipping requirements, and application techniques in order to prepare and verify shipping documents for safety and destination coding, classifications, and hazardous material handling criteria. Grade 6 packers have skill in the preparation of all documentation for hazardous material to be packed, stored, and shipped, including the visual assessment of their physical condition, quantity, size, and special handling or storage requirements. They have a thorough knowledge of overall warehouse procedures, space utilization, and condition discrepancy coding. In some work situations they use computerized equipment to access regulatory requirements for packing hazardous items.

The appealed positions require the appellants to have knowledge and skills relating to documenting, consolidating, packing, handling, shipping, and transportation of a wide variety of hazardous freight. The appellants are required to visually assess material and accompanying documentation. They may use various substances in preservation of material or equipment packed and may be required to construct or assist in construction or assembly of packing material that is not fully assembled upon receipt. The appellants also use databases to access regulations and process their work in addition to common tools of the trade such as tools needed to adapt or modify containers to size.

The appellants believe that their hazardous certification knowledge, training and experience are not properly credited. Their job requirements include researching regulations for correct information,

monitoring the location of material, and proper documentation and verification of required data via manual and automated processes and systems. The appellants have responsibility for independently handling hazardous material to ensure adherence to regulations and policies, and may use their knowledge to answer routine questions and provide guidance to military units. There are at least nine WG-7002 Packers, however, they are not the recognized experts of hazardous materials since this is relegated to a higher level position. Review of the appeal record and information obtained during telephone audits reveal that the appellants may answer questions pertaining to required types of packing, however subsequent responsibility lies with the Packing Specialist who provides substantive advice to other bases and military units concerning the packaging of hazardous material. Accordingly, this element meets but does not exceed the WG-6 level as described by the standard.

*Responsibility:* Grade 5 packers work under the direction of their supervisor who gives instructions and technical guidance on new or changed policies and assignments. Routine work is performed independently and completed work is spot checked by the supervisor

Grade 6 packers work with a high degree of independence in determining the methods to use in preserving/packing a wide variety of standard and non-standard items. Grade 6 packers use judgment in selecting proper packing for special types and sizes of materials. Completed work is spot checked for compliance with packing/preservation requirements by a supervisor.

The appellants work independently using the knowledge and skills required in handling hazardous materials accompanied by guidelines from various Federal agencies, States and international entities. Their work is checked at random by their supervisor and other higher level personnel in areas where they perform their work. The appellants emphasized that accuracy is very important in preparing the coding and documentation necessary to handle, ship, and store these materials. There are instances when the appellants may alter special packing instructions (SPI) to accommodate a certain mode of travel. Documents coded incorrectly could lead to severe mishaps, even death in the event of spillage. While this was substantiated during the audit, the consequences of possible mishap, although recognized, does not in itself increase the grade level of the positions. This is further evidenced by the appellants' observation that few occurrences of severe mishaps occur, i.e., no incidents due to certification within the last several years. The appellants use files that contain hazardous packing specifications to determine what type of packaging would be required for a particular type of material. Unusual problems may be referred to the Packing Specialist who is the agency's primary expert on the packaging of hazardous material. The appellants note as part of their responsibility that they are assigned to a spill team for clean up of hazardous waste. However, the appellants do not make independent judgment calls in this area but rather work under the guidance of expert personnel including the fire department and other environmental specialists. They perform the actual work operations, for example, containment of hazardous material by confining the area, roping off, placing absorbent material or barriers, and assisting in the clean up effort. This meets WG-6 level for Responsibility.

*Physical Effort:* There is no distinction in physical effort described at grade levels 4, 5, and 6. The employee in this occupation is required to perform work on hard surfaces and in areas requiring frequent standing, stooping, bending, or working in tiring or uncomfortable positions. Frequently,

the employee may lift or carry containers that weigh between 40 and 70 pounds. This is similar to the physical effort required by the appellants.

*Working Conditions:* There is no distinction in working conditions described at grade levels 4, 5, and 6. The employee in this occupation works in a warehouse environment, and on occasion outside when loading or unloading trucks. The employee may be exposed to the possibility of cuts/scrapes/bruises, noxious fumes/skin irritants/flammable liquids or gases, etc. Protective clothing is not worn other than regular issue, such as safety shoes, but it is available as needed. Protective gear is available for the appellants when needed.

The appealed position meets but does not exceed the WG-6 level of the Packer standard.

We have indicated that the WG-7002 Packer standard is most appropriate for the duties and responsibilities of the position. The WG-6912 standard does, however, include some discussion of work involving hazardous materials. Because the appellants believe the WG-7 level of that series is appropriate for their position, we will briefly discuss that level of materials examiner and identifier work.

Examiners at the WG-7 level independently perform the full range of examining and identifying duties for the most complex categories of materials and equipment. They perform complex searches of shipping and storage records and have authority to accept or reject materials, equipment, and complex assemblies for the facility based on their knowledge of products, equipment, and procedures as well as the ability to determine subtle and inconspicuous defects. Rather than comparing contracts, complex specifications and catalog drawings and computerized or microfiche drawings typical of the WG-6 level, the WG-7 examiner continuously use precision measuring tools such as calipers, micrometers, and multi meters to examine a diverse range of materials to determine improper assembly, repair needs and potential equipment malfunctions.

The WG-7 examiners must have a thorough knowledge of the techniques and equipment used in the examination and classification of standard, unusual and highly specialized items. In the case of highly specialized and complex materials and equipments they independently determine disposition. For example, they may refer equipment to an item manager due to parts missing; return an item to the vendor when improperly sent; or refer an item to quality assurance or maintenance personnel due to an observed defect. They are knowledgeable of special handling techniques and procedures required for the processing of hazardous and toxic materials, industrial plant equipment, strategic and precious metals and other sensitive items. Duties and responsibilities at the WG-7 level exceed those of the grade 6 level in variety, delegated authority, and item complexity. In addition to materials that are generally examined by employees at the WG-6 level, they may also examine material that requires sensory judgment and subjective measurements on a regular basis. They perform chemical, magnetic and spark tests as required to determine metallic composition of precious, semiprecious and strategic metals within computers, circuit boards, weapons' systems, modules, and communication devices.

While many of the materials to be packed are considered hazardous, the appellants' determinations of acceptability are primarily checked visually. The appellant's work requires them only to determine

acceptability for shipping and determining the appropriate methods to be used, not accepting or rejecting complex or highly specialized equipment as required of the materials examiners and identifiers.

The appellants are not required continuous use of precision measuring tools such as calipers, micrometers and multi meters to examine electronic, industrial, construction, and other equipment and materials to determine improper assembly, repair needs and potential equipment malfunctions typified by the Materials Examiners and Identifier WG-7. The audit reveals that the appellants generally run magnetic testing on material for compatibility with the different modes of travel. They also wear radiation badges and conducts wipe testing as a form of checking the area where radioactive material has been stored. The appellants believe that their experience and training with radioactive materials are not given due credit. However, radiation tests are further screened and validated by higher grade personnel with more expertise in the field. The appellants are not required to perform this variety or depth of testing nor do they operate with the level of independence expected at the WG-7 level of this series.

The record indicates the appellants may spend from 15 to 20 percent of their time operating a forklift. Work involving a forklift capable of lifting loads less than 10,000 pounds to heights of 168 inches is graded at the WG-5 level. This is comparable to the work performed by the appellants.

### *Summary*

In accordance with OPM's FWS mixed job policy, a position is normally titled and graded to the job grading standard that represents the highest skill and qualification requirements when such work is performed as a regular and recurring part of the job. In the appealed position, the highest skill or qualification required is that of the WG-7002-6 Packer standard.

### **Decision**

We find the positions properly classified as Packer (Fork Lift Operator), WG-7002-6.