



October 31, 2008

TERRY J. WILSON
VICE PRESIDENT, SOUTHEAST AREA OPERATIONS

WILLIAM R. GILLIGAN
ACTING CHIEF POSTAL INSPECTOR

SUBJECT: Audit Report – Handling of Suspicious Mail at the
Huntsville Processing and Distribution Facility
(Report Number SA-AR-09-001)

This report presents the results of our review of the Handling of Suspicious Mail at the Huntsville Processing and Distribution Facility (P&DF) (Project Number 08YR001SA000). Our objective was to determine whether Postal Service personnel followed proper policies and response procedures in handling suspicious mail discovered at the Huntsville P&DF. Our review focused on events surrounding the discovery of a suspicious package at the Huntsville P&DF on July 25, 2008, and the actions of Postal Service personnel involved in the incident.

We conducted this self-initiated review to assess the risk to mail operations and the safety and security of employees, mail, and critical assets. See [Appendix A](#) for additional information about this review.

Conclusion

Huntsville P&DF personnel did not follow Postal Service policies and response procedures for handling suspicious mail and unknown substances found at the facility on July 25, 2008. Specifically, responsible Huntsville P&DF personnel:

1. Did not initially contact the U.S. Postal Inspection Service, but instead called the local fire department.
2. Improperly cleaned up the unknown spilled substance.
3. Improperly handled and moved the suspicious package.

This occurred because management at the Huntsville P&DF did not always participate in and provide annual training and practice drills to employees to ensure they understand procedures for handling suspicious mail,¹ unknown substances, and hazardous materials (HAZMAT).² Specifically:

- The four employees³ involved in the incident had not received annual suspicious mail training and did not participate in practice drills.
- The supervisor involved in the incident had not completed required annual Hazardous Waste Operations and Emergency Response (HAZWOPER) training.
- Although the responding HAZMAT team member had completed the required annual HAZWOPER training, [REDACTED]⁴

Because employees did not follow policies and procedures for handling suspicious mail and personnel at the Huntsville P&DF were not appropriately trained, there is an increased risk of disruption to operations and to the safety and security of employees, the mail, and other critical assets.

We recommend the Vice President, Southeast Area Operations, in consultation with the Chief Postal Inspector:

1. Require management at the Huntsville Processing and Distribution Facility to participate in and provide annual training and practice drills to employees to ensure they understand procedures for handling suspicious mail, unknown substances, and hazardous materials.

Management's Comments

Management partially agreed with the recommendation and stated they will not establish a requirement for annual training but will provide refresher training as situations identify a need. Further, management stated the Huntsville P&DF management team has begun a training initiative which will include "Suspicious Package Training" for all employees by October 31, 2008; 8-hour HAZWOPER training for all Executive Administrative Service and 204-b⁵ employees; and refresher HAZWOPER training for all HAZMAT team members. In addition, they stated the Huntsville facility will increase the number of craft employees trained on HAZWOPER to

¹ Postal Service Memorandum of Policy - Suspicious Mail and Unknown Powders and Substances, May 2005.

² Postal Service policy requires HAZMAT training annually for responsible employees.

³ One employee started working with the Postal Service approximately 1 month before the incident.

⁴ Additionally, we reviewed training records of 19 managers and supervisors at the facility who were not involved in the incident and determined none receive annual suspicious mail training and 18 did not complete annual HAZWOPER refresher training, as required.

⁵ 204-b employees are acting supervisors.

15. Employees will complete all training on or before November 30, 2008. See [Appendix C](#) for management's comments, in their entirety.

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendation and the corrective actions should resolve the issues identified in the report. Management's plan to train all employees should ensure they understand procedures for handling suspicious mail, unknown substances, and HAZMAT. However, we believe establishing a specific frequency for suspicious mail training (such as annually) would allow for a more proactive approach to preparing personnel to handle suspicious mail; and decrease the risk to employees, customers, the mail, and other critical assets.

The OIG considers the recommendation significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. This recommendation should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

We will report this physical safety and security risk as a non-monetary impact in our *Semiannual Report to Congress*.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Andrea L. Deadwyler, Director, Inspection Service and Facilities, or me at (703) 248-2100.

E-Signed by Darrell E. Benjamin, Jr 
VERIFY authenticity with ApproveIt

Darrell E Benjamin, Jr.
Deputy Assistant Inspector General
for Support Operations

Attachments

cc: Zane M. Hill
John A. Grimes
John F. Bolger
Katherine S. Banks

APPENDIX A: ADDITIONAL INFORMATION

BACKGROUND

On July 25, 2008, at approximately 3:00 a.m. Central Standard Time, a Postal Service employee at the Huntsville P&DF notified the [REDACTED], of a leaking package discovered in the parcel post room. The package appeared to leak on three other packages. The [REDACTED] notified a member of the on-site HAZMAT team and both individuals examined the packages, which had no apparent odor or smoke. A mail handler shop steward subsequently arrived at the incident, saw mail handlers working around the area of the leak, and asked the [REDACTED] to clear the area of mail handlers pending identification of the unknown substance. The [REDACTED] agreed and cleared the area of mail handlers.

To contain the spill, the HAZMAT team member put the packages in separate containers and then mopped up the spill. While cleaning, the HAZMAT team member observed that the floor seemed discolored in the area of the leak and informed the [REDACTED]. The [REDACTED] went back to the affected area and noticed the floor was ashy grey where the package had leaked and immediately moved the packages outside of the Postal Service facility. Still unable to identify the substance, the [REDACTED] called 911 at approximately 4:15 a.m.

The Huntsville Fire Department (HFD) arrived and attempted, but was unable, to contact the addressee on the package. The HFD HAZMAT team, with approval of the [REDACTED], opened the package and found four broken bottles, which they determined to be medicine. As a result, three of the dampened packages were placed back in the mailstream and the remaining package was turned over to an on-site HAZMAT team member. See [Appendix B](#) for a photograph of HFD personnel responding to the incident, which received local media coverage.

After the HFD cleared the incident, the [REDACTED] notified the U.S. Postal Inspection Service and waited for further instructions for the disposition of the leaking package. Later that same day, the Postal Inspection Service cleared the leaking package for delivery.

CRITERIA

Suspicious Mail

Postal Service Publication 167-B, *Response Checklist Suspicious Mail and Unknown Powders or Substances*, September 2006: Provides a checklist for action to take in the event of the discovery of suspicious mail or unknown substances.

Postal Service Memorandum, *Tabletop Exercises – Suspicious Mail and Unknown Powder or Substances*, August 25, 2006: Requires facilities to certify completion of

an awareness program, including stand-up talks and tabletop exercises, for suspicious mail and unknown powders and substances.

Postal Service Poster 205-A, *Immediate Response Actions Suspicious Mail and Unknown Powders or Substances*, August 2006: Provides the following guidance to employees, supervisors, and managers for handling suspicious mail.

Package - Don't handle it. Isolate it.

People - Clear the area of people. Notify your supervisor.

Plan - Contact the Postal Inspection Service. Follow your local emergency action plan.

Postal Service Memorandum of Policy, *Suspicious Mail and Unknown Powders and Substances*, May 2005: Provides policies and procedures regarding the handling of suspicious mail, unknown powder and substances, and other leaking HAZMAT. Management and employees must be periodically trained on suspicious mail and unknown powder/substance response using tabletop exercises, stand-up talks, and other communications. The Headquarters Office of Emergency Preparedness (OEP)⁶ will provide information on the frequency and required certification of these activities.

Hazardous Materials

Postal Service Safety Training Matrix, March 2008: Provides annual HAZWOPER training requirements for employees to demonstrate their understanding of hazardous material response procedures.

Postal Service Management Instruction EL-810-2006-3, *Response to Hazardous Materials Releases*, March 2006: Describes procedures for planning and responding to releases (spills and leaks) of HAZMAT originating from items placed in the mailstream. Specifically, employees must not move, transport, handle, or clean up any suspicious mail or unknown substances and must:

- Immediately isolate the area where suspicious mail or unknown substances were found.
- Notify a supervisor or manager, who must contact the Postal Inspection Service.

⁶ In February 2007, the Postal Service consolidated OEP to form the Office of National Preparedness within the Postal Inspection Service.

Postal Service *Integrated Emergency Management Plan (IEMP)*, January 2004:⁷

The Postal Service established the IEMP as the all-hazard, comprehensive plan to mitigate, prepare for, respond to, and recover from any natural or man-made disaster. Facilities are required to develop specific annexes for each type of emergency that may be experienced. Annex 3D: *Hazardous Materials Spills and Leaks* states that when a hazardous material is suspected in the workplace, the supervisor is notified and directs employees to a safe area. The supervisor calls the on-site spill and leak team to identify the substance and, if they determine it is harmless, to clean it up. If the material is hazardous or unknown, the supervisor notifies the safety officer, higher management, and postal inspectors. If a resolution is not reached, management calls local first responders to request a HAZMAT team.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine whether Postal Service personnel followed proper policies and response procedures in handling suspicious mail discovered at the Huntsville P&DF on July 25, 2008. To accomplish our objective, we interviewed Postal Inspection Service and Postal Service officials, including employees involved in the incident, and reviewed policies and procedures for handling suspicious mail and unknown substances. We also reviewed training records from the National Training Database to determine whether personnel received training and guidance in handling suspicious mail. Although we did not conduct extensive tests to determine the accuracy of computer-generated data, we discussed the training records with applicable personnel and compared the data to other source documents. As a result, we consider the data sufficiently reliable to support the opinions and conclusions in this report.

We conducted this review from July through October 2008 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 review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objective. We discussed our observations and conclusions with management officials on October 7, 2008, and included their comments where appropriate.

⁷ In our audit report, *Postal Service Continuity of Operations for the Great Lakes Area* (Report Number SA-AR-08-009, June 23, 2008), management stated they will issue national preparedness templates by June 2009.

PRIOR AUDIT COVERAGE

In the past 3 years, the OIG issued two reports regarding suspicious mail and unknown substances. In these reviews, we found personnel did not follow policies and procedures for handling suspicious mail and unknown substances. In addition, management did not establish an IEMP to ensure employees were familiar with policies and procedures for effectively responding to suspicious mail incidents. Management generally agreed with our recommendations to participate in and provide continuous mandatory training and practice drills for employees to ensure they understand procedures for handling suspicious mail and unknown substances. Management further agreed to implement an IEMP that includes procedures for handling suspicious and dangerous mail.

In addition, the U.S. Government Accountability Office (GAO) issued a report on Postal Service guidance for suspicious mail. Overall, the report concluded that, although the Postal Service had several guidelines on identifying and responding to suspicious mail, personnel did not follow this guidance. The GAO recommended, and management generally agreed to, further improving the Postal Service's guidance related to suspicious mail to ensure that personnel are prepared to respond to future incidents.

Report Title	Report Number	Final Report Date
OIG Reports		
<i>Handling of Suspicious Powder Incident at the Wichita Falls Mail Processing Center</i>	SA-AR-07-005	July 11, 2007
<i>Handling of a Potentially Explosive Ordnance at the Dallas Bulk Mail Center</i>	SA-AR-07-001	March 29, 2007
GAO Report		
<i>U.S. Postal Service: Guidance on Suspicious Mail Needs Further Refinement</i>	GAO-05-716	July 19, 2005

APPENDIX B: PHOTOGRAPH OF RESPONSE



Photo of HFD Responding to the
Suspicious Packages at the Docking Area of the Huntsville P&DF

Courtesy of WAFF 48 News in Huntsville, Alabama

APPENDIX C: MANAGEMENT'S COMMENTS

TERRY J. WILSON
VICE PRESIDENT, AREA OPERATIONS
SOUTHEAST AREA



October 23, 2008

LUCINE WILLIS
DIRECTOR, AUDIT OPERATIONS
USPS OFFICE OF INSPECTOR GENERAL

SUBJECT: Management response to the audit report – Review of the Handling of
Suspicious Mail at the Huntsville Processing and Distribution Facility

We appreciate the opportunity to provide comments to the audit report of the Handling of Suspicious Mail at the Huntsville Processing and Distribution Facility. The attached represents management's response to the USPS Office of Inspector General's recommendation.

If you have any questions, please contact Patrick Corcoran, Inspector in Charge, at 202-268-4470 or Doug Miller, Manager Processing/Distribution, Huntsville, Alabama, at 256-461-6603.

A handwritten signature in black ink, appearing to read "T.J. Wilson".

Terry J. Wilson
Vice President, Southeast Area Operations

A handwritten signature in black ink, appearing to read "Zane Hill, Jr.".

Zane Hill, Jr
Deputy Chief Inspector

Attachment

cc: W. R. Gilligan, Chief Postal Inspector
Alan Grimes, Acting Director of National Preparedness
Martin Phanco, Inspector in Charge, Atlanta Division
William J. Mitchell, Alabama District Manager
Bobby E. Miller, Alabama District Senior Plant Manager
Doug Miller, Manager Processing/Distribution, Huntsville, AL
Katherine S. Banks, Manager, Corporate Response And Audit, HQs

Response to USPS-OIG Audit

Review of the Handling of Suspicious Mail at the Huntsville Processing and Distribution Facility

Summary of Management Response

We have reviewed the draft report of the Postal Service's handling of Suspicious Mail at the Huntsville Processing and Distribution Facility. The report does not contain any confidential business sensitive or law enforcement sensitive information that would preclude disclosure under the Freedom of Information Act. We are in partial agreement with the recommendation and have taken steps to implement the recommended training. We do not agree that this isolated incident should result in a requirement for annual training.

OIG Recommendation 1

The Vice President, Southeast Area Operations, in consultation with the Chief Postal Inspector, requires management at the Huntsville Processing and Distribution Facility to participate in and provide annual training and practice drills for employees to ensure they understand procedures for handling suspicious mail, unknown substances, and hazardous materials.

Management Response

Management partially agrees with the recommendation. Management will not establish a requirement for annual training but will provide refresher training as situations identify a need.

As a result of the July 25, 2008 incident, the Huntsville P&DC Management Team has begun a training initiative which will include all plant employees. Every employee will receive "Suspicious Package Training." This training is ongoing and will be completed by October 31, 2008. All EAS and 204-b employees will complete the full eight-hour HAZWOPER training. Additionally, all Hazmat Team members on HAZWOPER will receive refresher training. The Huntsville, Alabama Plant will increase the number of craft employees trained on HAZWOPER to 15.

All training will be completed on or before November 30, 2008.