

March 12, 2002

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SUBJECT: Management Advisory – Review of Decontamination Activities at the
Pentagon Station (Report Number LH-MA-02-003)

This self-initiated report is one in a series of reports on the Postal Service's efforts to decontaminate facilities that have tested positive for anthrax (Project Number 02YG008LH000). Our intent is to help protect the interest of the Postal Service by making recommendations as soon as we identify issues. This report addresses the decontamination activities at the Pentagon Station. Our objective was to determine whether adequate controls were in place to ensure that the Pentagon Station that tested positive for anthrax was decontaminated in accordance with policies and procedures. The objective, scope, and methodology for this review are discussed in Appendix A.

Background

According to Postal Service documentation, as of December 7, 2001, 284 Postal Service facilities have been tested for anthrax. Of these, 23 have tested positive for anthrax and 21 have been decontaminated (or cleaned). The Postal Service has hired prequalified contractors experienced in the handling of bio-hazardous materials to decontaminate those facilities that have tested positive for anthrax.

On October 30, 2001, following a request by the facility manager, the Pentagon Station was tested for anthrax by the Centers for Disease Control and Prevention. Postal Service officials were notified on November 4, 2001, that test results were positive. They responded by immediately dispatching, that same day, a contractor to decontaminate and retest the facility. On November 5, 2001, after decontamination had occurred, Pentagon officials closed the Pentagon Station and Defense Protective Services¹ conducted a walk through of the facility. Based on their observations,

¹ According to a Defense Protective Services official, they have exclusive jurisdiction over security issues on the Pentagon Reservation.

retesting of the facility was initiated that same day. Negative test results were received on November 8, 2001, and the facility was reopened later that day.

Results

Our review disclosed that the contractor that decontaminated the Pentagon Station also conducted the retesting to verify the facility had been decontaminated. In addition, we found that the contractor did not complete the decontamination of the facility in accordance with their report to the Postal Service. We also found the Postal Service did not effectively communicate the November 4, 2001, positive anthrax test results, to Pentagon officials.

Verification of Decontamination Activities and Independence of Duties

Internal controls are an integral component of an organization's management activities that provide reasonable assurance of the effectiveness and efficiency of operations. To reduce the risk of error or fraud, key duties and responsibilities need to be divided or segregated so that no one individual (or entity) controls all key aspects of an event.² The Postal Service is responsible for ensuring that facilities are adequately decontaminated for the purpose of maintaining a safe and healthful workplace for the Postal Service community while also providing universal service.

Our review found a sufficient level of independence existed when the Centers for Disease Control and Prevention conducted the initial testing of the Pentagon facility for anthrax and provided its positive test results to the Postal Service who then hired a contractor to decontaminate the facility. However, there was no independence when the contractor who decontaminated the facility also retested the facility, thus certifying its own work.

We also found the contractor did not complete the decontamination of the facility in accordance with their report to the Postal Service. Specifically, following completion of the decontamination work, the contractor reported that it had removed "all mail from every box"³ and "all mailboxes were sprayed and wiped."⁴ However, as depicted in the photo below, while walking through the facility after the decontamination occurred, Pentagon officials found that mail was left in post office boxes and all post office boxes were not sprayed and wiped.

² General Accounting Office (GAO) Standards for Internal Control in the Federal Government, November 1999, GAO/AIMD-00-21.3.1.

³ The term "box" as referred to in this report means post office box.

⁴ The term "sprayed and wiped" as used in this report means the method used to decontaminate, which is a process where by a 10 percent bleach solution (one part bleach to nine parts water) is sprayed on a surface and then wiped off.

Figure 1: November 5, 2001, Pentagon Photo of Mail Left in Post Office Boxes



The Postal Service incident commander responsible for decontamination activities at the Pentagon Station told us that no one from the Postal Service verified the work done by the contractor at that site; nor did he see a problem with allowing the same contractor who performed the decontamination work to retest the facility. He said contractors are professionals and the Postal Service has hired them for their experience and expertise in dealing with these matters.

We determined that at the time the Pentagon Station was decontaminated on November 4, 2001, there were no policies and procedures governing decontamination activities in Postal Service facilities. Interim guidelines were implemented on December 4, 2001;⁵ however, we found the guidelines did not require internal controls to ensure adequate decontamination, or independence of duties for initial testing, decontamination, and retesting.

We believe this level of independence of duties is necessary to provide reasonable assurance that the decontamination process is adequately conducted. Inadequate decontamination of a facility could result in an increased risk of exposure to employees and others. Also, in this situation, it resulted in the closing of the station for 4 days while additional testing was conducted. In addition, contractors may receive payment for services they do not provide.

Recommendation 1. We recommend the chief operating officer and executive vice president, revise the interim guidelines to include internal controls that would ensure independence of duties between the entities that initially test, decontaminate, and retest Postal Service facilities.

⁵ Interim Guidelines for Sampling, Analysis, Decontamination, and Disposal of Anthrax for U.S. Postal Service Facilities, December 4, 2001.

Management's Comments. Management agreed with the intent and concern of this recommendation, but did not agree that an independence of duties was necessary or advisable. Management explained to us that the Postal Service could not guarantee such independence in the event of a widespread biological attack because there are insufficient numbers of contractors to perform these kinds of services. Management also stated that current efforts regarding testing and decontamination of Postal Service facilities are closely coordinated with the Centers for Disease Control and Prevention, the Environmental Protection Agency and other governing bodies who review all aspects of decontamination activities. For example, the Postal Service has recently incorporated a quality assurance requirement into the statements of work for sampling activities at Postal Service facilities. These requirements call for a representative from the Centers for Disease Control and Prevention or their designee to participate in and provide quality assurance for post decontamination sampling activities.

Management stated that the Postal Service is currently working with the Federal National Response Team in a subgroup called the National Coordinating Committee, which is comprised of representatives from across the government to produce a consensus document governing national response to anthrax attacks. This consensus document will cover all aspects of sampling, decontamination, and public communication.

Management believes the consensus document will capture the review process and will ensure that all parties involved in sampling, cleaning, and retesting will be closely scrutinized. Management stated that it may be advisable, depending on circumstances, to have one entity do initial testing, decontamination, and retesting, to ensure accuracy and continuity, but this should be decided on a case-by-case basis. Management stated that the Postal Service's interim guidelines would be revised to track the contents of the consensus document.

Management believes that subsequent actions to provide quality assurance in the post decontamination sampling process and their ongoing work with the Federal National Response Team will address the underlying concern of the recommendation.

Evaluation of Management's Comments. Management's comments are responsive to our recommendation and should resolve the issues identified in the report.

Recommendation 2. We recommend the vice president, Purchasing and Materials, review the performance requirements for the contractor who decontaminated the Pentagon Station to determine if a refund is due the Postal Service for nonperformance of services.

Management's Comments. Management agreed with the recommendation and reviewed the performance of the contractor and determined that no refund was due the Postal Service for nonperformance of services for several reasons. For example, management said the contractor's report to the Postal Service was inaccurate when it

stated that “all mailboxes were sprayed and wiped.” Management said in reality “only those suspect banks received double duty.” In addition, management said the retesting of the area by the Pentagon, which resulted in negative test results, confirmed that the contractor successfully performed the services.

Evaluation of Management’s Comments. Management’s comments are responsive to our recommendation. The action taken will address the issues identified in our report.

Communication of Test Results Could Be Improved

The Postal Service did not effectively communicate the Pentagon Station’s positive anthrax test results to all interested parties at the Pentagon prior to undertaking decontamination activities. This lack of disclosure resulted in Pentagon officials:

- Closing the Pentagon Station.
- Working without the information necessary to make an informed decision regarding the health and safety of employees at the Pentagon.
- Incurring additional expenses⁶ to conduct tests to determine if anthrax was present in the facility.

Pentagon officials told us they learned of the positive test results from the Homeland Security Office reports, and subsequently closed the station. Following an inspection of the Postal Service facility by Defense Protective Services, Pentagon officials determined the decontamination by the Postal Service’s contractor may not have been adequately performed and initiated their own testing.

Our review found, at the time the Pentagon Station was tested, there were no procedures for communicating anthrax test results to interested third parties. A member of the Unified Incident Command Center later confirmed this information. Since that time, interim guidelines have been implemented and provide limited communication protocols. However, we found they do not include a requirement to notify third parties of positive test results. Because the Pentagon Station was colocated with other Pentagon offices, we believe the Postal Service should have communicated anthrax test results to Pentagon officials.

Recommendation 3. We recommend the chief operating officer and executive vice president, revise the interim guidelines to include procedures for communicating test results to other parties when Postal Service facilities are colocated with other businesses, offices, or non-Postal Service tenants.

⁶ According to the Biological Agent Testing Team with Defense Protective Services at the Pentagon, they spent approximately \$27,000 in conducting additional tests.

Management's Comments. Management agreed with our recommendation and indicated that the Interim Guidelines are being revised by the Postal Service as part of the National Coordinating Committee to include public communication. Management stated that in the case of the Pentagon Station, the chaotic situation contributed to some communication issues. They said a key contributor was that the Centers for Disease Control and Prevention conducted the sampling, and had its own criteria for notification, which was a separate activity beyond the Postal Service's control. Management believes that lessons learned and subsequent cooperation on communication with all involved parties addressed this recommendation.

Evaluation of Management's Comments. Management's comments are responsive to our recommendation. The actions taken should correct the issues identified in our report.

Overall Management's Comments. Management stated that the period of time addressed by the draft advisory was extremely chaotic. They acknowledged there were no uniform guidelines for sampling, decontamination, and other safety and health issues in response to a release of weaponized anthrax spores in the mailstream. They said that complicating the issue was the fact that the Pentagon was recovering from a devastating attack and Defense officials were making their own decisions based on their own counsel. Management said that in this atmosphere, it was not surprising that there were some confusion and communication problems. Management stated, however, the central fact, is that under these extreme conditions, the Postal Service was able to effect decontamination of the Pentagon Station, and no one became infected with anthrax.

Management also stated there were some apparent errors of fact in the draft report and gave one example in the background section. Specifically, management stated that the Unified Incident Command Center indicated that the decision to sample the Pentagon Station was made at the Postal Service Headquarters level, and not from the facility manager.

Evaluation of Overall Management's Comments. The draft report stated that at the request of the facility manager, the Pentagon Station was tested for anthrax. We believe that is a true statement, and was not trying to imply that the facility manager made the decision. We agree that the overall decision to test was made at the headquarters level. We have modified the report language, however, to clarify that the decision was made following a request by the facility manager.

The Office of Inspector General (OIG) considers recommendations 1 and 3 significant and, therefore, requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed. We appreciate the cooperation and courtesies provided by your staff during our review. If you have any questions, or need additional information, please contact Chris Nicoloff, director, Labor Management, at 214-775-9114, or me at (703) 248-2300.

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APPENDIX A. OBJECTIVE, SCOPE, AND METHODOLOGY

Our overall objective was to determine whether adequate controls were in place to ensure that the Pentagon Station that tested positive for anthrax was decontaminated in accordance with policies and procedures. Our sub-objectives were to:

1. Evaluate whether contractors adequately tested, decontaminated, and retested the facility prior to reopening.
2. Assess the safeguards in place to protect the mail during decontamination.

We addressed the first sub-objective in this report. The second sub-objective will be addressed in a separate report.

To accomplish our objectives, we reviewed the Postal Service's Interim Guidelines for Sampling, Analysis, Decontamination, and Disposal of Anthrax for U.S. Postal Service Facilities, dated December 4, 2001, the Postal Service decontamination contract with the International Technology Corporation, the Occupational Safety and Health Administration's regulations for hazardous waste operations and emergency response,⁷ and GAO Standards for Internal Control in the Federal Government.

To understand the requirements for decontaminating Postal Service facilities and to evaluate the adequacy of the contractor's decontamination activities, we reviewed the interim guidelines and interviewed officials at Postal Service Headquarters and the Unified Incident Command Center. We also interviewed officials with the contractor—International Technology Corporation, the Corps of Engineers, Environmental Protection Agency, and Occupational Safety and Health Administration.

We conducted our review from December 2001 to March 2002, in accordance with the President's Council on Integrity and Efficiency, Quality Standards for Inspections. We discussed our conclusions and observations with appropriate management officials and modified our report accordingly.

⁷ Hazardous Waste Operations and Emergency Response Standards – 29 Code of Federal Regulations, 1910.120 and 1926.65.

APPENDIX B. MANAGEMENT'S COMMENTS



February 15, 2002

RONALD K. STITH

SUBJECT: Draft Management Advisory-Review of Decontamination Activities
at the Pentagon Station (LH-MA-02-DRAFT)

Thank you for the opportunity to review the subject draft. To accomplish this review we have solicited input from involved persons in Purchasing and Materials (field and headquarters), Environmental Management Policy (EMP), Safety Performance Management, and the Unified Incident Command Center (UICC). This review will address concerns on investigating these early sampling and decontamination activities, discuss some of the apparent errors of fact in the draft, and respond to the recommendations.

The period of time addressed by the draft advisory was extremely chaotic. There were no uniform guidelines for sampling, decontamination, and other safety and health issues in response to a release of weaponized anthrax spores in the mailstream. Complicating the issue was the fact that the Pentagon was recovering from a devastating attack and defense officials were making their own decisions based on their own counsel. In this atmosphere it is not surprising that there were some confusion and communication problems. The central fact, however, is that under these extreme conditions, the Postal Service was able to effect decontamination of the Pentagon Station, and no one became infected with anthrax.

Subsequent to the early response efforts in that time period, the Postal Service has worked continuously with the Center for Disease Control and Prevention (CDC), National Institute of Occupational Safety and Health (NIOSH), Environmental Protection Agency (EPA), local and state health departments, Homeland Security, and other involved entities to develop uniform procedures for all aspects of response to anthrax releases. The efforts are ongoing and our knowledge is constantly improving. We believe that what we have learned and implemented in the period since November 5 render much of the observations and recommendations in the draft advisory moot. However we will address the three recommendations specifically below.

Based on information from involved persons at the UICC, Purchasing, and EMP, it appears there are some errors in the background section. For example, the UICC indicates that the decision to sample the Pentagon Station was made at the postal headquarters level, not from the facility manager, since CDC/NIOSH sampled this particular office and all offices immediately downstream of Brentwood.

Regarding whether the Pentagon Station was decontaminated as reported, statements by IT Corporation (IT) officials, which were verified by the postal incident commander, indicate that each suspect bank of boxes was sprayed and wiped. All non-suspect banks were sprayed completely and left to air dry. All mail was removed from all boxes on November 4, according to the IT on-site supervisor and the postal inspector with oversight responsibility. The issue may be that the IT report inaccurately describes the procedure used, stating that "all mailboxes were sprayed and wiped" when in reality "only those suspect banks received double duty" in accordance with then current USPS protocols.

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Below we respond to the recommendations.

“Recommendations. We recommend the chief operating officer and executive vice president revise the interim guidelines to include internal controls that would ensure:

1. Independence of duties between the entities that initially test, decontaminate, and retest Postal facilities.”

We do not agree with this recommendation, given the current circumstances. During the crisis time covered by this report, there were very few qualified contractors who could perform sampling and decontamination at short notice. We believe that subsequent actions have adequately addressed the underlying concern in this recommendation. We agree with that concern, but do not agree that independence of duties is necessary or advisable. The Postal Service is currently working with the Federal National Response Team (NRT) in a subgroup called the National Coordinating Committee (NCC), comprised of representatives from the EPA, NIOSH, CDC, OSHA, and others, to produce a consensus document governing national response to anthrax attacks. The Interim Guidelines referenced in the draft will be revised to track the NRT document. This document will cover all aspects of sampling, decontamination, public communication, etc. Current efforts regarding testing and decontamination in our facilities are closely coordinated with the CDC, EPA, and other governing bodies, who review all aspects of the project. The future NRT document will capture this review process. We believe that ensures that all parties involved in sampling, cleaning, and retesting will be closely scrutinized. It may also be advisable, depending on circumstances, to have one entity do initial testing, decontamination, and retesting, to ensure accuracy and continuity, but this should be decided on a case-by-case basis. The oversight would come from the review process noted above.

We also recommend the vice president, Purchasing and Materials:

2. Review the performance requirements for the contractor who decontaminated the Pentagon Station to determine if a refund is due the Postal Service for nonperformance of services.

We agree and reviewed the performance of the contractor and determined the following: no refund is due to the Postal Service for nonperformance of services due to the following:

- a. The contractor is not paid according to individual tasks performed. Ours is a time and materials contract. The Postal Service paid IT only for the hours the services were performed at the Pentagon.
- b. Retesting of the area by the Pentagon's independent contractor subsequent to the November 4, 2001, decontamination confirms that IT successfully performed services as required. All test results returned negative from the Pentagon's independent contractor.
- c. It has been verified by John Bridges, the USPS incident commander, that IT performed all services on November 4, 2001, in accordance with USPS protocols that were in effect at the time.
- d. The USPS cannot substantiate that the picture taken on November 5, 2001, constitutes nonperformance or negligence on the part of IT.

We recommend the chief operating officer and executive vice president:

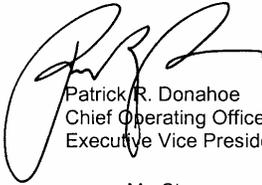
3. Revise the interim guidelines to include procedures for communicating test results to other parties when Postal Service facilities are colocated with other businesses, offices, or non-Postal Service tenants.

We agree that communication of test results (and other information) to all involved is a critical action. As noted above, the Interim Guidelines are already being revised by the Postal Service as part of the

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NCC to include public communication. As stated earlier, in the Pentagon Station instance the chaotic situation contributed to some communication issues. A key contributor was the fact that at the time, the CDC conducted the initial sampling and had its own criteria for notification, which was a separate activity beyond USPS control. We believe that lessons learned and subsequent cooperation on communication with all involved parties addresses this recommendation.

The first draft of the NCC anthrax guidance document is due for review on February 22.



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