



July 11, 2007

ELLIS A. BURGOYNE  
VICE PRESIDENT, SOUTHWEST AREA OPERATIONS

SUBJECT: Audit Report - Handling of a Suspicious Powder Incident at the Wichita Falls Mail Processing Center (Report Number SA-AR-07-005)

This report presents the results of our self-initiated review of the Wichita Falls Mail Processing Center's (MPC) handling of a suspicious powder incident (Project Number 07YR002SA000). The Postal Inspection Service's Office of Dangerous Mail Investigations and Homeland Security informed the U.S. Postal Service Office of Inspector General (OIG) of this incident on March 1, 2007. As a result, the OIG reviewed the U.S. Postal Service's policies, procedures, and practices for handling suspicious mail and unknown powders or substances. Our review focused on events surrounding the discovery of the suspicious powder at the Wichita Falls MPC and the actions of Postal Service personnel involved in the incident.

### **Background**

On February 13, 2007, at approximately 8:35 p.m., Central Standard Time, a Postal Service employee at the Wichita Falls MPC found a powdery substance while processing mail on a Delivery Barcode Sorter (DBCS) machine and notified the Manager, Mail Processing. The manager examined the substance and determined that it was non-threatening based on its sweet odor; he then contacted the Postmaster, Wichita Falls MPC. The Postmaster advised the manager to follow the protocol for suspicious mail and unknown substances.

The employee who found the substance notified the manager and then contacted the President, American Postal Workers Union, and the Postal Inspection Service. The union president called the manager and instructed him to call the fire department. The fire department responded and assessed the situation; however, they did not have the equipment needed to test the substance. The fire department instructed the manager to double bag the substance and wait for the Postal Inspection Service to arrive. The manager then instructed the facility custodian to bag the tray and isolate the mail that had the unknown substance on it. Following the manager's instructions, the custodian bagged the mailing and moved it to another area of the building; he also cleaned the DBCS machine before the unknown substance could be examined.

An inspector assigned to dangerous mail investigations at the Fort Worth Division of the Postal Inspection Service arrived and tested the substance. The test results revealed a

97 percent match for commercial foot powder, which did not present a hazard to employees.

### **Objective, Scope, and Methodology**

Our objective was to determine whether the Postal Service followed proper policy and response procedures in handling the suspicious powder discovered at the Wichita Falls MPC. To answer our objective, we interviewed Postal Service officials and reviewed policies and procedures for handling suspicious mail and unknown powders or substances. We also reviewed documentation and statements obtained from Postal Service and Postal Inspection Service personnel involved in the incident, and we reviewed training records to determine whether personnel received training and guidance in handling suspicious mail.

We conducted this review from March through July 2007 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Management officials agreed with the observations and conclusions we presented to them in May 2007.

### **Prior Audit Coverage**

- OIG audit report, *Handling of a Potentially Explosive Ordnance at the Dallas Bulk Mail Center* (Report Number SA-AR-07-001, dated March 29, 2007). The review found that Dallas Bulk Mail Center (BMC) employees mishandled a potentially explosive ordnance found on the premises. Additionally, BMC management did not establish the required Integrated Emergency Management Plan (IEMP). We recommended and management agreed to provide continuous mandatory training and practice drills for employees and complete a site-specific IEMP.
- OIG management advisory report, *Response to Incidents Involving Suspicious Mail and Unknown Powders and Substances* (Report Number DA-MA-05-001, dated May 27, 2005). The report stated that Postal Service managers, supervisors, and employees were generally aware of policies for handling suspicious mail and unknown powders and substances. However, the report identified instances of policy noncompliance and the need for field emergency preparedness managers to enhance employees' awareness and adherence to policies. We recommended and management agreed to encourage field emergency preparedness managers to improve employees' awareness of emergency planning, ensure compliance with established policies and procedures, and remove outdated references on the suspicious mail website.
- OIG audit report, *Postal Service Practices with Regard to Handling Suspicious Mail* (Report Number SA-AT-05-002, dated May 20, 2005). The audit concluded that the Postal Service and the Postal Inspection Service did not effectively respond to a suspicious mail incident at the Government Mail Processing Facility,

located in Washington, DC. We recommended that the Postal Service develop a site-specific, comprehensive emergency action plan. In addition, we recommended the Postal Inspection Service provide consistent and complete policies and require training in handling suspicious powder mail incidents.

Postal Service management agreed with the recommendation to develop a site-specific comprehensive emergency action plan and said they had implemented a plan that included the proper procedures. Postal Inspection Service management said they were updating policies and operating procedures to respond better to suspicious substances. They also said they would require and provide basic threat assessment and response training for field inspectors and postal police officers, and provide more extensive training for employees who handle dangerous mail.

- Government Accountability Office (GAO) report, *U. S. Postal Service: Guidance on Suspicious Mail Needs Further Refinement* (Report Number GAO-05-716, dated August 8, 2005). GAO stated that although the Postal Service had several guidelines on identifying and responding to suspicious mail, at the time of the October 2003 ricin (an extremely poisonous protein) incident, personnel did not follow this guidance. GAO found that the lack of consistency and clarity in guidance contributed to the noncompliance. GAO recommended and management generally agreed to further improve the Postal Service's guidance related to suspicious mail to ensure that personnel are prepared to respond to future incidents.

## **Results**

Wichita Falls MPC personnel did not follow policies and procedures for handling suspicious powders and unknown substances found in the mail on February 13, 2007. Additionally, Wichita Falls MPC management did not establish an IEMP to ensure employees were familiar with policies and procedures for effectively responding to suspicious mail incidents. As a result, Postal Service employees and critical assets were not appropriately safeguarded, and personnel were exposed to increased risks that could have resulted in serious health problems or death.

### **Mishandling of Suspicious Powder by Postal Service Personnel**

*Postal Bulletin, Poster 205-A*<sup>1</sup> provides the following guidance to employees, supervisors, and managers for handling suspicious mail. (See Appendix A.)

- Package  
Don't handle it. Isolate it.

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<sup>1</sup> *Immediate Response Actions – Suspicious Mail and Unknown Powders or Substances*, Poster 205-A, August 2006

- People  
Clear the area of people. Notify your supervisor.
- Plan  
Contact the Postal Inspection Service. Follow your local emergency action plan.

Publication 167-B<sup>2</sup> also outlines specific actions to take in response to incidents involving suspicious mail and unknown powders or substances. (See Appendix B.)

Postal Service personnel at the Wichita Falls MPC mishandled the suspicious powder by not fully executing published policies and procedures. Specifically:

- An employee attempted to conduct a threat assessment and identify the suspicious powder.
- Employees did not isolate the area around the suspicious powder as required.
- An employee in direct contact with the suspicious powder did not wash her hands.
- Management did not initially contact the Postal Inspection Service, but instead called the local fire department, which did not have the equipment needed to test the suspicious powder.
- Management instructed an employee to clean the affected machine before the Postal Inspection Service determined that the area was safe.
- Management did not notify employees on the next tour that a suspicious powder incident had occurred, but instead allowed them to enter the building and begin working before the Postal Inspection Service tested the substance and determined that the area was safe.

Wichita Falls management informed us they had provided stand-up talks on suspicious mail and unknown powders or substances to employees in November and December 2006, before the incident occurred. Additionally, the *Postal Bulletin* insert was posted at the facility at the time of the incident. However, despite these actions, Postal Service employees did not follow procedures for handling suspicious mail and unknown powders or substances. Managers and employees need continuous, mandatory training and practice drills to ensure that they fully understand the procedures for handling suspicious or dangerous mail.

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<sup>2</sup> *Response Checklist Suspicious Mail and Unknown Powders or Substances*, Publication 167-B, September 2006, Office of Emergency Preparedness.

Based on this incident, Wichita Falls MPC management conducted a suspicious powder drill on March 26, 2007, and a tabletop exercise on March 30, 2007, to reemphasize the proper procedures and response to suspicious mail and unknown powders or substances.

### **Integrated Emergency Management Plan**

Wichita Falls MPC management did not have an IEMP in place to respond to the suspicious powder incident as required. A Postal Service memorandum dated January 13, 2004, established the IEMP as the one plan for the Postal Service to use to mitigate, prepare for, respond to, and recover from any natural disaster or man-made hazard. The IEMP establishes a standardized emergency management process that incorporates Postal Service incident-specific and planning efforts into a single comprehensive document that will serve as the core guide for emergency management.

The Office of Emergency Preparedness<sup>3</sup> has developed a standard IEMP template to use as a guide for emergency management. Each installation is required to customize the standardized IEMP template to address specific processes and procedures and other information pertinent to the site. Management informed us that they had not developed an IEMP because they assumed it was only required for facilities with Biohazard Detection Systems (BDS). This confusion resulted from the *Memorandum of Policy – Suspicious Mail and Unknown Powders and Substances*, dated May 2, 2005, which states that IEMPs are currently deployed at sites with BDS and will be phased in nationwide. The Wichita Falls MPC is not a BDS site; however, guidance from the Office of Emergency Preparedness and the standard IEMP template state that all level 24<sup>4</sup> and above facilities should have an IEMP, and the Wichita Falls MPC is in this category.

Although Wichita Falls MPC management provided stand-up talks and displayed posters at the facility, Postal Service employees did not follow proper procedures in handling the suspicious powder incident. Continuous training in procedures for handling suspicious mail and unknown powders and substances and developing an IEMP should improve responses to suspicious mail incidents.

Management Actions: The Fort Worth District Emergency Preparedness Manager and Wichita Falls MPC management are developing an IEMP.

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<sup>3</sup> In March 2007, the Postal Inspection Service assumed responsibility for Emergency Preparedness.

<sup>4</sup> Level designations are determined by the size of retail operation, delivery, operations, revenue generated, type of mail processing, classification of area offices, and level or classification of the installation head.

### **Recommendation**

We recommend the Vice President, Southwest Area Operations:

1. Require management at the Wichita Falls Mail Processing Center to participate in and provide continuous mandatory training and practice drills for employees to ensure that they understand procedures for handling suspicious mail and powders and unknown substances.

### **Management's Comments**

Management agreed with our recommendation. Management stated employees failed to follow Postal Service protocol on February 13, 2007, even though multi-level, comprehensive training for the proper response to suspicious mail/unknown powders was provided in Wichita Falls during the first quarter of fiscal year (FY) 2007. Management further stated that the Wichita Falls Mail Processing Center is now required to conduct quarterly practice drills with employees through the fourth quarter of FY 2008. Additionally, management indicated that the Fort Worth Inspection Service Homeland Security Coordinator, District Security Control Officer, and Manager, Post Office Operations #7, will monitor, evaluate and give feedback to Wichita Falls management and union representatives during and after these drills for the first year. If significant progress is shown, semiannual drills will be required each year thereafter.

Management also stated that the Fort Worth District staff will conduct the Suspicious Powder/Unknown Substance Tabletop Exercise annually with Inspection Service assistance. In addition, employees will view a DVD presentation prior to each drill to reinforce the importance of following proper procedures and protocol; and stand-up talks will continue to be given and documented. Management's comments, in their entirety, are included in Appendix C.

### **Evaluation of Management's Comments**

Management's comments are responsive to our recommendation and actions taken or planned should correct the issues identified in the finding.

### **Recommendation**

We recommend the Vice President, Southwest Area Operations:

2. Require management at the Wichita Falls Mail Processing Center to complete and implement an Integrated Emergency Management Plan that includes procedures for handling suspicious and dangerous mail, requires training for employees, and requires that practice drills be conducted to improve responses to suspicious mail incidents.

### **Management's Comments**

Management agreed with the recommendation and stated that actions have been taken to complete the IEMP template and emergency annexes with a focus on Annex 1B, Suspicious Powders and Unknown Substances. Management further stated that an IEMP will be completed and in place by the end of Quarter 3, FY 2007. Management's comments, in their entirety, are included in Appendix C.

### **Evaluation of Management's Comments**

Management's comments are responsive to our recommendation and actions taken or planned should correct the issues identified in the finding.

The OIG considers recommendations 1 and 2 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. 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,   
VERIFY authenticity with ApproveIt

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

### Attachments

cc: William C. Rucker  
John H. Bridges  
Michele L. Culp  
Katherine S. Banks

## APPENDIX A. POSTAL BULLETIN FOR HANDLING SUSPICIOUS MAIL



# Immediate Response Actions — Suspicious Mail and Unknown Powders or Substances

### **REMEMBER** — the Three P's:

- PACKAGE:** Don't handle the package. Isolate it.  
**PEOPLE:** Clear the area of people. Notify your supervisor.  
**PLAN:** Contact the Inspection Service. Follow your local emergency action plan.

### **EMPLOYEES** — take the following actions:

- Leave the piece of mail or substance where it was found. Do not disturb it.
- Clear all employees from the immediate area where the piece of mail or substance is located. Prevent others from entering the area.
- Notify a supervisor or manager immediately. If a supervisor is not available, contact the Postal Inspection Service.
- Wash hands and exposed skin with soap and water.

### **SUPERVISORS AND MANAGERS** — take the following actions:

- Cordon off the area. Keep others away from the piece of mail or substance.
- Follow the steps outlined in Publication 167-A or 167-B, *Response Checklist for Suspicious Mail and Unknown Powders or Substances*.
- Call the Postal Inspection Service locally or at the toll-free telephone number listed below. Tell them what you know about the piece of mail or substance. The Inspection Service will conduct a threat assessment.
- Take protective actions based on:
  - The Inspection Service's threat assessment and instructions.
  - Your local emergency action plan.
- In an emergency situation — such as smoke, fumes, vapors, or employees exhibiting medical symptoms — evacuate the area and call local emergency responders. Follow the instructions of emergency responders. Make the notifications indicated in your local emergency action plan.
- Communicate expediently with employees, local unions, and management associations. Convey only the facts. Avoid speculation! As much as possible, have local first responders help you to provide information.

**Inspection Service 24-hour, toll-free telephone number:  
1-877-US MAIL 5 (or 1-877-876-2455).**

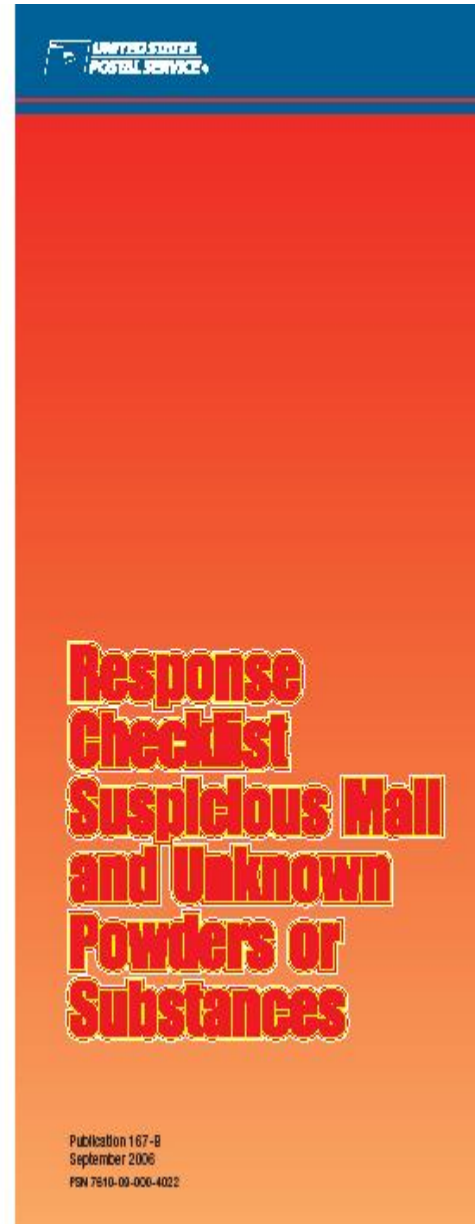
Poster 205-A  
August 2006  
PSN 7690-08-000-1683



## APPENDIX B. RESPONSE CHECKLIST FOR HANDLING SUSPICIOUS MAIL

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

**UNITED STATES  
POSTAL SERVICE**  
475 L'ENFANT PLAZA, SW  
WASHINGTON, DC 20260-0020



## Checklist of Actions To Take

1. Leave the piece of mail or substance where it was found. Do not disturb. Do not try to clean up the substance.
2. Clear the immediate area of all persons and keep others away.
3. Instruct people in the immediate area to wash hands and other exposed skin with soap and water.
4. Direct these persons to a designated area away from the substance to wait for further instructions.
5. List the name of each person in the immediate area of the piece of mail or substance.
6. Cordon off the immediate area.
7. Shut down all equipment in the immediate area.

8. Shut down all heating, ventilating, and air conditioning (HVAC) systems.

9. If possible without disturbing the piece of mail or substance, document:

Location of the piece of mail or substance:

\_\_\_\_\_  
\_\_\_\_\_

Description of the substance:

\_\_\_\_\_  
\_\_\_\_\_

Description of the piece of mail:  
(markings, labels, declarations, postage)

\_\_\_\_\_  
\_\_\_\_\_

Name and address of the addressee on the piece of mail:

\_\_\_\_\_  
\_\_\_\_\_

Name and address of the mailer on the piece of mail:

\_\_\_\_\_  
\_\_\_\_\_

10. Call the Postal Inspection Service. Tell them what you know about the piece of mail or substance. The Inspection Service will conduct a threat assessment.

Call locally or at the  
Inspection Service 24-hour, toll-free  
telephone number:

**1-877-US MAIL 5** (or 1-877-876-2455)

11. Take protective actions based on:

- Threat assessment and instructions given by the Inspection Service.
- Your local emergency action plan.

12. Call your District Emergency Preparedness Manager to report this incident in the Postal Emergency Management System (PEMS). This is mandatory.

13. Communicate expediently with employees, local unions, and management associations. Convey only the facts. Avoid speculation! As much as possible, have local first responders help you to provide information.

If there is evidence of an emergency, such as smoke, fumes, vapors, or employees exhibiting medical symptoms, immediately:

- Activate your local emergency plan.
- Evacuate the area.
- Call local emergency responders and follow their instructions. Call 911 or the local emergency response telephone no. :

\_\_\_\_\_

Office of Emergency Preparedness  
475 L'Enfant Plaza, SW, Room 3901  
Washington, DC 20260-3901

<http://blue.usps.gov/emergencypreparedness/>

## APPENDIX C. MANAGEMENT'S COMMENTS

ELLIS A. BURGOYNE  
VICE PRESIDENT, SOUTHWEST AREA OPERATIONS



June 11, 2007

KIM H. STROUD  
DIRECTOR, AUDIT REPORTING  
1735 N. LYNN ST.  
ARLINGTON, VA 22209-2020

SUBJECT: Draft Audit Report Dated May 25, 2007  
Handling of a Suspicious Powder Incident at the Wichita Falls Mail Processing Center  
Report Number SA-AR-07-DRAFT

As requested in the subject Draft Audit Report, I am submitting Southwest Area management's written response to your finding and recommendations regarding this incident.

**Finding:**

Wichita Falls MPC personnel did not follow policies and procedures for handling suspicious powders and unknown substances found in the mail on February 13, 2007.

**Recommendation:**

Require management at the Wichita Falls Mail Processing Center management to participate in and provide continuous mandatory training and practice drills for employees to ensure that they understand procedures for handling suspicious mail and powders and unknown substances.

**Fort Worth District Response:**

The Fort Worth District agrees with the OIG finding that—even though multi-level, comprehensive training had been given and received in Wichita Falls regarding the proper response to suspicious mail/unknown powders during the first quarter of FY2007—employees failed to follow USPS protocol on February 13, 2007.

To facilitate complete and continuing understanding of USPS protocol in regard to Suspicious Mail/Unknown Substances, the Wichita Falls Mail Processing Center is now required to conduct quarterly practice drills with employee involvement through Quarter 4 of FY 08. The Fort Worth Inspection Service Homeland Security Coordinator, District Security Control Officer, and Manager, Post Office Operations #7, will monitor, evaluate, and give immediate feedback to Wichita Falls management and union representatives during and after these drills for the first year. If significant progress is exhibited, semi-annual drills will be required with District presence each year thereafter.

Additionally, the Suspicious Powder/Unknown Substance Tabletop Exercise will be conducted annually by Fort Worth District staff, with Inspection Service assistance. Management and union representatives will be required to attend these exercises. Also, the six-minute DVD presentation provided to all employees this fiscal year will again be viewed by employees prior to each quarterly or semi-quarterly drill to reinforce the importance of following proper procedures and protocol while first and third Friday Standup Talks will continue to be given and documented.

Handling of a Suspicious Powder Incident at the Wichita Falls Mail Processing Center  
June 11, 2007

PO Box 224748  
DALLAS TX 75222-4748  
214-819-8650  
FAX: 214-905-9227

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**Finding:**

Wichita Falls MPC management did not have an IEMP in place to respond to the suspicious powder incident as required.

**Recommendation:**

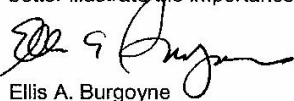
Require management at the Wichita Falls Mail Processing Center to complete and implement an Integrated Emergency Management Plan that includes procedures for handling suspicious and dangerous mail, requires training for employees, and requires that practice drills be conducted to improve responses to suspicious mail incidents.

**Fort Worth District Response:**

Fort Worth District management agrees that Wichita Falls Processing Center management must create and implement an Integrated Emergency Management Plan that includes procedures for handling Suspicious Mail/Unknown Substances.

To this end, the IEMP template and emergency annexes have been provided to management for completion. Focus will be given to Annex 1B, Suspicious Powders and Unknown Substances. The IEMP and associated annexes will be completed and in place by the end of Quarter 3, FY 07.

We appreciate the expert review and recommendations tendered by the Office of the Inspector General regarding this incident, and will share knowledge with other facilities in the Southwest Area to better illustrate the importance of vigilance, protocol, and communications.



Ellis A. Burgoyne