

**OFFICE OF PERSONNEL MANAGEMENT  
ATLANTA OVERSIGHT DIVISION  
ATLANTA, GEORGIA**

CLASSIFICATION APPEAL DECISION

Under section 5346(c) of title 5, United States Code

**Appellants:** [The appellants]

**Position:** Packer  
WG-7002-06

**Organization:** Packing Branch  
Transportation and Packing Division  
Defense Distribution Depot  
Defense Distribution Region East  
Defense Logistics Agency  
[city, state]

**Decision:** **Packer**  
**WG-7002-06**  
(Appeal denied)

**OPM Decision Number:** C-7002-06-01

Kathy W. Day  
Classification Appeals Officer

Date: 8/14/97

RD#7002067a.at

Copies of Decision Sent to:  
[CCs]

## **Background**

On May 13, 1997, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for the job of Packer, WG-7002-6, at [The Department of Defense]. The appellants are requesting that their position be reclassified to provide for appropriate credit for their certification of hazardous material responsibilities. They believe their work is more closely related to the Materials Examiner Identifier series, WG-6912.

The appeal has been accepted and processed under section 5346(c) of title 5, United States Code. This is the final administrative decision on the classification of the job subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations.

## **Sources of Information**

This appeal decision is based on information from the following sources:

1. The appellants' letter of May 1, 1997, appealing the classification of their position.
2. Agency correspondence dated June 3 and 5, 1997, providing job and organizational information.
3. A telephone interview with the appellants on July 15, 1997.
4. A telephone review with [the appellant's co-worker], on July 16, 1997.
5. A telephone interview with the [the appellant's supervisor], on July 16, 1997.

## **Position Information**

The appellants are assigned to Position Number 42848N which was classified by the Human Resources Office on November 20, 1996. The appellants and the supervisor have certified to the accuracy of the position description.

The appellants pack a wide variety of items from paper clips to tank engines that weigh 2-3,000 pounds. Some items are considered hazardous, such as oxygen cylinders, pesticide containers, radioactive material, and munitions. A wide variety of tools are used in the packing including impact wrenches, stapling machines, and metering machines. A forklift, hoist and other types of equipment are used as required by the size and weight of the item to be packed. The appellants are responsible for the appropriate packing and labeling. When packing hazardous material, the appellants are responsible for certification that the material is appropriately packed and labeled for the class of material being shipped. They are personally liable and may face penalties of monetary fines and prison confinement for errors in packaging, marking and certification of hazardous

material. The appellants may be assigned to a specific warehouse for a period of time to pack items; other items are brought to a central location.

The amount of hazardous material received for packing is minimal. Overall, the appellants pack hazardous material approximately 10 percent of the time. The material is sealed-source material, meaning that the containers are sealed and the employees do not have to mix chemicals or handle the actual material. Packers do have to refer to Federal regulations regarding hazardous material and must be trained and certified to ensure proper packing and preparation for shipment in accordance with all requirements.

The appellants work independently performing the duties of the position with little or no additional direction. They receive the material to be packed by release orders or specific assignment from the supervisor. The supervisor is available to provide guidance on an as needed basis, e.g., if there are problems with documents or if additional assistance is required due to the volume of packing to be done.

### **Standards Referenced**

Job Grading Standard for Packer, WG-7002, July 1995.

Job Grading Standard for Materials Examiner and Identifier, WG-6912, March 1990.

### **Series and Title Determination**

The appellants believe the Materials Examiner and Identifier, WG-6912, series may be more appropriate for their duties.

The WG-6912, Materials Examiner and Identifier, Job Grading Standard is used to grade work involving the identification, classification, examination, acceptance and disposition of materials and equipment. Materials examiners and identifiers determine physical condition, adherence to product specifications, and equipment defects, utilizing shipping documents, contracts, catalogs, drawings, and related documents. While the appellants' current job involves some measure of item examination and identification, this analysis is incidental to the packing work performed and not the primary purpose of their job. The WG-6912 Job Grading Standard is, therefore, not appropriate.

The Packer, WG-7002, Job Grading 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. The work includes preserving and packing specialized devices, delicate equipment, munitions, weapons, and combustible and toxic materials and substances. The work requires knowledge of various protective devices and cushioning materials, a wide range of preserving and packing procedures and techniques, and of regulatory and safety requirements that apply to preserving, packing, labeling, storing, and shipping standard and nonstandard materials.

The appellants' job involves work in packing and repacking a wide variety of materials. Most packing is accomplished using prefabricated containers such as wood or cardboard and a variety of packing materials such as cushioning or foam to protect the items from damage. The work requires the use of tools and equipment to move and pack the material. The appellants must pack the items in accordance with all Federal and international regulatory packing and shipping requirements for hazardous and nonhazardous materials and items, and they must have an in-depth knowledge to prepare and verify shipping documents for correct safety and destination coding, classifications and hazardous material handling criteria. They use computers to access various programs regarding national stock numbers, packing information, regulations, etc. The certification required when packing hazardous material is a regulatory requirement, and the WG-7002 Job Grading Standard requires knowledge of all safety and regulatory requirements relating to packing of standard and nonstandard materials. The appellants' duties correspond to the description in the WG-7002 Job Grading Standard.

The appropriate series is, therefore, WG-7002. In accordance with the Job Grading Standard, the appropriate title is Packer.

### **Grade Determination**

The Packer, WG-7002, Job Grading Standard describes work at grade levels 4 through 6. If jobs differ *substantially*, they may be graded above or below. Work is described in general and by reference to four factors: skill and knowledge, responsibility, physical effort, and working conditions.

#### **General:**

Grade 6 packers perform a wide variety of standard and specialized preservation and/or packing work typically requiring special documentation and custom packing, handling, preservation, and shipping procedures to comply with a wide variety of regulatory requirements. They independently determine the materials, containers, devices, and preservatives needed to prepare the items for packing, shipping, and storage. They may use computer equipment to access regulatory requirements for packing hazardous items.

Like the grade 6 level, the appellants work independently making decisions on the materials, containers, and devices needed to prepare the full range of standard and specialized materials and equipment for packing, shipping or storage. The appellants ensure that work meets all Federal and international regulatory packing and shipping requirements. In addition, they use computerized equipment to access regulatory requirements for packing hazardous items. The appellants prepare and process all documentation, special handling labels, shipping codes and required safety data.

There is no evidence in the appeal record that the appellants' duties exceed the WG-6 level, therefore, grade 6 is the level assigned for the General category.

### Skill and Knowledge:

Grade 6 packers must have, in addition to an indepth knowledge of a wide variety of preservation processing and standard packing methods and techniques, detailed knowledge of specialized techniques for preservation and/or custom packing. They are skilled in determining weight support points for large or irregular material and in fabricating the necessary bracing and protective forms. They have a thorough knowledge of procedures and documentation requirements to prepare and verify shipping documents for correct safety and destination coding, classifications, and hazardous material handling criteria. Grade 6 packers have skill in the preparation of all documentation for hazardous materials to be packed, stored, and shipped including the visual assessment of their physical condition and their quantity, size and specialized handling, labeling or storage requirements.

The appellants' work meets the grade 6 level. They possess an indepth knowledge of a wide variety of standard packing methods and techniques, as well as knowledge of a wide variety of specialized packing methods and techniques. They determine weight support points for large and irregular mechanical items and devices and fabricate support bracing and blocking to prevent shifting or breakage. The appellants have a thorough knowledge of agency, Federal and international packing and shipping regulations and requirements for hazardous and nonhazardous materials and items. They pack hazardous materials and certify that required Federal regulations have been met in the packing of such materials. Although the appellants contend that they should receive additional credit for certifying hazardous material, the standard at the grade 6 level recognizes the requirement to apply Federal regulations and procedures to the packing and handling of hazardous materials. Certifying that these regulations have been followed does not require an additional skill or knowledge level and does not impact the grade of the position.

There is no evidence in the appeal record that the appellants' skills and knowledges exceed the WG-6 level, therefore, grade 6 is credited for this factor.

### Responsibility:

Grade 6 packers receive work assignments from their supervisor. They are required to comply with all safety and regulatory requirements relating to preservation and packing and work with a high degree of independence. They use judgment in selecting materials and determining work sequences and provide technical guidance to lower level workers in preserving and packing specialized and sensitive material and equipment, including hazardous materials. Completed work is spot checked by the supervisor.

Comparable to the grade 6 description, the appellants work with a high degree of independence in determining the methods and techniques they use to pack a wide variety of standard and nonstandard items. They select the necessary materials and decide work sequences when instructions are incomplete or involve specialized types and sizes of materials to be packaged.

They provide some guidance to lower level workers in packing hazardous material. Completed work is spot checked for compliance with packing requirements by the supervisor.

There is no evidence in the appeal record that the appellants' responsibilities exceed the WG-6 level, therefore, this factor is credited at the grade 6 level.

#### Physical Effort:

The physical effort description at the grade 4 level is the same for all grade levels in the standard. Packers perform work on hard surfaces and in areas that require frequent standing, stooping, bending, and working in tiring and uncomfortable positions. Packers frequently lift and carry parts, equipment, and packed containers that weigh up to 40 pounds and may be required to lift and carry with assistance, items weighing up to 70 pounds. The physical effort required by the appellants' position is comparable to this criteria.

#### Working Conditions:

The working conditions described at the grade 4 level are the same for all grade levels in the standard. Packers typically work in well lighted, heated and ventilated areas. They occasionally work outside or in areas that are drafty and poorly lighted. The work is sometimes dusty, dirty, and greasy. They are frequently exposed to the possibility of cuts, scrapes, and bruises. In certain work situations involving hazardous material, packers wear protective clothing, respirators, and other specialized protective devices in addition to their basic protective equipment (e.g. hard hats, safety glasses and shoes, and ear plugs). The appellants rarely have to wear respirators with the hazardous materials they handle. Otherwise, their working conditions are comparable to the criteria described in the standard.

### **Summary**

In comparing the work of the appellants with the WG-7002 Job Grading Standard, the appellants' job is appropriately graded at the WG-6 level.

### **Decision**

This job is properly classified as Packer, WG-7002-6. This decision constitutes a job grading certificate issued under the authority of section 5346(c) of title 5, United States Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government.