

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,

