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JUNE 2023



## Inspection Report: Environmental Program Inspection

OIG Report Number 23-07

U.S. GOVERNMENT PUBLISHING OFFICE

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MEMORANDUM  
OIG-23-037

**Date:** June 21, 2023

**To:** Director, U.S. Government Publishing Office

**From:** Acting Inspector General, U.S. Government Publishing Office

**Subject:** Final Report— Environmental Program Inspection, Report Number 23-07

Enclosed is the subject final report. The Office of the Inspector General (OIG) conducted an inspection of the GPO's Environmental Program. We reported three findings and made seven recommendations to improve the Environmental Program. The recommendations focus on compliance and recordkeeping, improving processes, and training.

GPO reviewed the draft report and provided comments through the Director. In accordance with the Council of the Inspectors General on Integrity and Efficiency standards for inspections, we reviewed GPO's comments for relevance and completeness and included them in appendix E. GPO's comments are included in their entirety. We made minor editorial changes to the report where relevant and informed by the management comments, for example, we added footnote 25.

GPO concurred with six recommendations and concurred in part with one recommendation. The proposed actions were responsive to the recommendations. We summarize management's comments and provide a detailed response throughout the body of the report. All recommendations remain open at this time.

We appreciate the courtesies extended to our staff throughout this review. If you have any questions or comments about this report, please contact Connie Greene, Assistant Inspector General for Inspections, at [cgreene@gpo.gov](mailto:cgreene@gpo.gov) or (202) 512-1597.

A handwritten signature in black ink that reads "Nathan J. Deahl".

NATHAN J. DEAHL  
Acting Inspector General



## RESULTS IN BRIEF

### What We Did

The OIG inspection team examined how the U.S. Government Publishing Office (GPO) addressed violations identified during the 2016 U.S. Environmental Protection Agency (EPA) and the 2014 DC Department of Energy & Environment (DOEE) inspections.

Specifically, we assessed:

1. Whether GPO is properly maintaining pollution prevention equipment;
2. How GPO provides required training for employees who generate or are responsible for handling waste; and
3. Needed improvements to the resources the Environment Manager uses to support Plant Operations and Security & Intelligent Documents with expert guidance and oversight.

### What We Found

**Finding 1. Lack of training, reliance on past practices, and the absence of SOPs led GPO to continue to commit the same types of infractions for which they were assessed civil penalties of \$140,000 during the 2016 EPA and the 2014 DC DOEE inspections.** Although GPO has directives and policies to manage its Environmental Program, and the Environmental Manager conducts weekly spot inspections of GPO facilities, they continued to identify instances of the same types of infractions during weekly spot inspections, such as open containers of volatile organic compound (VOC) material. Additionally, supervisors were unaware of several trainings and procedures associated with handling hazardous materials. Supervisors instead relied on training through “word of mouth” and past practices to handle hazardous materials. Further, GPO suspended in-person training due to the COVID-19 pandemic and has not resumed in-person training. By relying on past practices, instead of structured training, internal policies, and standard operating procedures (SOPs), GPO remains at risk of committing the same types of infractions for which they were assessed civil penalties during the 2016 EPA and 2014 DOEE inspections.

**Finding 2. GPO is maintaining pollution prevention equipment, but day-to-day guidance regarding hazardous waste management could be improved. In addition, the Environmental Manager is not apprised of GPO Capital Investment decisions to identify potential environmental impacts.** GPO is ensuring maintenance service on pollution prevention equipment. However, GPO does not maintain a cleaning schedule for all pollution prevention equipment for cleaning in accordance with the manufacturer’s specifications. Additionally, GPO does not have written descriptions of day-to-day operations that may present a risk of discharging or releasing a hazardous substance. Also, employees do not have access to GPO’s emergency procedures and appropriate hazardous spill procedures at spill kits. Further, while GPO’s Directives are kept current with applicable Federal Policies and Practices, GPO does not have a process in place for recording VOC emissions and daily ink usage as required by the Title V permits. Moreover, GPO does not consult the Environmental Manager on Capital

Investment decisions. Finally, GPO does not conduct trend analysis for weekly spot inspection environmental infractions. Failure to adhere to the conditions governed by the Title V permit puts GPO at risk of being assessed civil penalties similar to those received during previous regulatory inspections.<sup>1</sup>

**Finding 3. GPO's Environmental Manager needs an additional full-time employee in order to provide Plant Operations and Security & Intelligent Documents with expert guidance and oversight.** During the course of the inspection, we noted that the Environmental Manager receives support from contracting staff and has sufficient equipment and training to manage the environmental program; however, program effectiveness could be increased with additional support personnel. To that end GPO is in the process of hiring an environmental protection specialist; at the time of this report, the position has been announced on USAJobs. Until this position is filled, the Environmental Manager will continue to focus their efforts on administrative tasks.

### **What We Recommended**

Our report contains seven recommendations designed to improve the effectiveness of GPO's Environmental Program. The recommendations focus on compliance and recordkeeping, improving processes, and training. GPO concurred with six recommendations and concurred in part with one recommendation. Overall, GPO's comments were responsive to the recommendations.

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<sup>1</sup> Title V of the 1990 Clean Air Act Amendments requires sources of air pollution to obtain an operating permit. The permit includes requirements regarding emissions limits and monitoring, record keeping, and reporting requirements.

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# INTRODUCTION

The inspection team examined how GPO addressed violations identified during the 2016 U.S. Environmental Protection Agency (EPA) and the 2014 District of Columbia (DC) Department of Energy & Environment (DOEE) inspections. We assessed whether GPO is properly maintaining pollution prevention equipment; how GPO provides required training for employees who generate or are responsible for handling waste; and any needed improvements to the resources the Environmental Manager uses to support Plant Operations and Security & Intelligent Documents with expert guidance and oversight. Based on the results, we made seven recommendations (see appendix A); the scope and methodology are presented in appendix B.

## Background

The GPO OIG initiated this review from its fiscal year (FY) 2021 annual work plan. The GPO Director requested this inspection in response to our request for topic submissions during the annual project planning cycle. Prior to providing our draft report to GPO for management comments, GPO updated its Hazardous Waste Management directive, and we re-considered that directive in our review and analysis.<sup>2</sup>

## ***GPO Environmental Office Mission***

The GPO Environmental Office's mission is to reduce the agency's environmental footprint through continuous improvement, regulatory compliance, and employee engagement. The Environmental Office formulates GPO-wide environmental policies and guidelines to ensure compliance with environmental laws and regulations, such as the Clean Air Act and the Resource Conservation and Recovery Act (RCRA). In accordance with RCRA's implementing regulations in the Code of Federal Regulations (CFR), GPO classifies its Central Office Complex as a small quantity generator (SQG)<sup>3</sup> of hazardous waste, and its Secure Production Facility (SPF) at Stennis as a very small quantity generator (VSQG)<sup>4</sup> of hazardous waste.

## ***GPO Environmental Policy***

GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023, established procedures to ensure that hazardous waste is appropriately identified and handled safely in accordance with applicable regulations to protect human health and the environment. The Directive also states that GPO is responsible for the management and control of any hazardous waste that the agency generates. Further, procedures for the control and disposal of hazardous waste must be maintained to ensure GPO's compliance with applicable EPA and DC DOEE regulations.

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<sup>2</sup> GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023.

<sup>3</sup> RCRA's implementing regulations define Small Quantity Generators as those that generate greater than 100 kilograms (220 lbs.) but less than 1,000 kilograms (2200 lbs.) of non-acute hazardous waste per month.

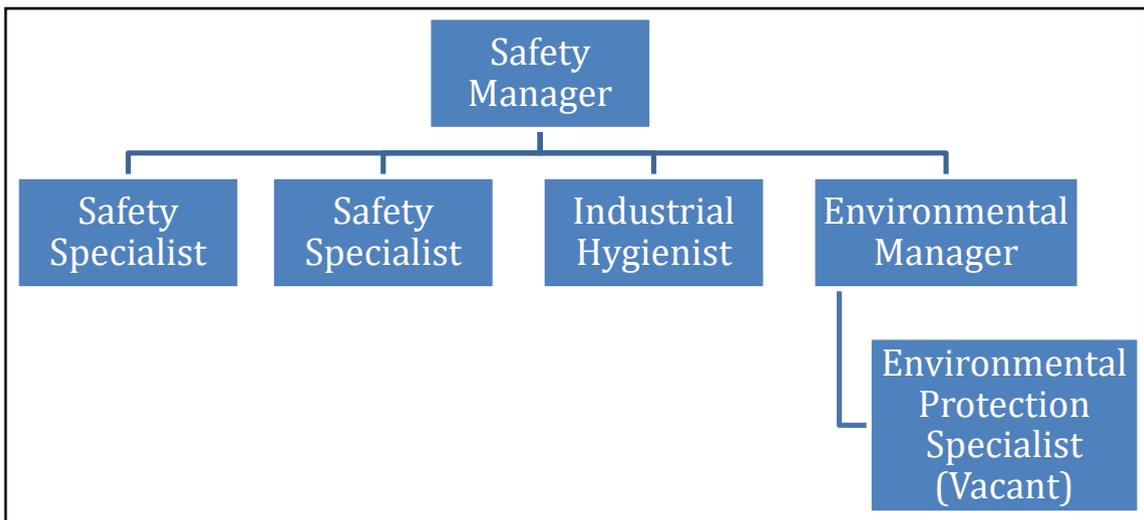
<sup>4</sup> RCRA's implementing regulations define Very Small Quantity Generators as those the generate less than or equal to 100 kilograms (220 lbs.) of non-acute hazardous waste per month.

**GPO Environmental Office Organization**

The Environmental Office resides within GPO's Security Services, Safety Branch.<sup>5</sup> The Safety Branch consists of six full-time employees (FTEs), and is headed by the Safety Manager, who is supported by two safety specialists, an industrial hygienist, the Environmental Manager, and an environmental protection specialist; see Figure 1, below.<sup>6</sup>



**Figure 1. Safety Branch Organizational Chart**



<sup>5</sup> During fieldwork, Security Services reorganized the Safety Branch to separate it from Product Security. Product Security focuses on secure credentials..

<sup>6</sup> The vacant environmental protection specialist position was added after our interviews with Safety Branch and Security Services leadership.

The six FTEs billeted to the Safety Branch are tasked with protecting GPO personnel and property while sustaining critical operations. These responsibilities include, but are not limited to:

- **Air Quality Program:** Operate under legally enforceable conditions listed in the Air Quality Permit issued by the DC DOEE. Air pollution includes volatile organic compounds (VOC), paints and solvents, refrigerants, baler and baghouse dusts, engine idling, odors, inks, and other chemicals used in printing and facility maintenance activities.<sup>7</sup>
- **Hazardous Waste Management Program:** Identify and dispose of wastes in accordance with the EPA, the Department of Transportation, and the DC DOEE regulations. Regulated hazardous wastes include paints, batteries, fluorescent light tubes, waste oil, unused/ outdated chemicals, toxic metals, and contaminated shop towels.
- **Asbestos Program:** The proper handling, management, and disposal of asbestos containing materials to minimize or eliminate employee exposures and releases into the environment. Asbestos containing materials have been used in many products such as pipe and boiler insulation, flooring, ceiling tiles, sheetrock, plasters, safes, and automotive brake/clutch components.
- **Pollution Prevention Program:** Reduce or eliminate waste at the source by modifying production processes, promoting non-toxic or less-toxic substances, implementing conservation techniques, and re-using materials as appropriate.
- **Recycling Program:** Oversee GPO's recycling of paper, oil, batteries, toner cartridges, shop towels, inks, metals, tires, cardboard, and other items from the facility, when waste cannot be reduced or reused.
- **Industrial Waste Water Program:** Adhere to GPO's DC Water Industrial User Wastewater Discharge Permit, wherein pretreatment standards apply to various waste, including chemical pollutants, heavy metals, VOCs, oil, and grease.
- **Storm Water Discharge Program:** Implement stormwater pollution prevention strategies that reduce or prevent pollutants from entering storm drains.
- **Industrial Safety Program:** Safety specialists conduct GPO-wide safety and health inspections, inquire into workplace accidents, and investigate employee reports of hazardous or unsafe conditions.
- **Fire Prevention Program:** Prevent fire and reduce injuries and financial loss, should a fire occur.
- **Fire Protection Equipment Program:** Protect GPO buildings through an automatic fire detection, alarm, and extinguishing system, including fire extinguishers and fire alarm boxes.
- **Evacuation Drills and Emergency Preparedness Program:** Familiarize employees with exit routes and ensure the prompt and safe exit of employees from all buildings in case of an actual emergency.

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<sup>7</sup> VOCs are compounds that have a high vapor pressure and low water solubility. VOCs are emitted as gases from certain solids or liquids from a wide array of products, such as paints and lacquers, cleaning supplies, and glues and adhesives.

Of the 11 items listed on page three, the Environmental Manager is responsible for managing seven of them, while three FTEs manage four of the items; see Figure 2, below.

In addition to the above activities, the Environmental Manager serves as the agency’s expert on Title 40 CFR, *Protection of the Environment*, which focuses on air pollution, and the RCRA, which focuses on hazardous waste, wastewater discharge, and recycling. The Environmental Manager is a certified asbestos inspector.<sup>8</sup> Additionally, the Environmental Manager serves as the Contracting Officer Representative and the Contracting Officer Technical Representative for the agency’s environmental program contracts.

## The Issue

On September 11, 2018, GPO received notification of violations resulting from an EPA inspection at the GPO Central Office Complex (July 11-14, 2016). GPO was cited with a civil penalty of \$140,000.00. Subsequent civil penalties were also imposed by the DC DOE totaling \$11,000.00. These alleged violations included 16 open containers of VOC material, 44 containers of hazardous waste not clearly labeled as “hazardous waste,” 61 instances of failing to make a hazardous waste determination, and operating pollution prevention equipment without a Title V permit.

**Figure 2. Safety Branch Tasks**



<sup>8</sup> The Safety Manager is also certified as an asbestos inspector.

## Objectives

Our overall objective was to examine how GPO addressed violations identified during the 2016 EPA and the 2014 DC DOEE inspections. Sub-objectives included:

1. Assess whether GPO is properly maintaining pollution prevention equipment;
2. Assess how GPO provides required training for employees who generate or are responsible for handling waste; and
3. Assess and ascertain any needed improvements to the resources the Environment Manager uses to support Plant Operations and Security & Intelligent Documents with expert guidance and oversight.

## Prior Evaluation Coverage

The OIG identified prior inspections or reviews related to the objectives of this inspection. Specifically:

- EPA Region III Multi-Media Compliance Evaluation Inspection of GPO, Washington, DC (2016 EPA inspection)
- DC DOEE FY 2014 Full Compliance Evaluation, Washington, DC (FY 2014 DC DOEE inspection)



## Criteria

- 42 United States Code (U.S.C.) §7401 et seq, *the Clean Air Act*, (1970), as amended, November 15, 1990
- 42 U.S.C. §6901 et seq, *the Resource Conservation and Recovery Act (RCRA)*, (1976), as amended, October 5, 2012
- Code of Federal Regulations (CFR), Title 40, *Protection of Environment*, June 28, 1985, as amended, July 1, 2021
- 40 CFR 112, *Oil Pollution Prevention*, July 1, 1994, as amended February 8, 2023
- 40 CFR 262, *Conditions for Exemption for a Small Quantity Generator that Accumulates Hazardous Waste*, November 28, 2016
- 49 CFR 172, Subpart D, *Marking*, (1976), as amended, January 19, 2011
- 49 CFR 172, Subpart E, *Labeling*, (1976), as amended, December 21, 2021
- EPA Region III Multi-Media Compliance Evaluation Inspection of GPO, Washington, DC, Week of July 11-14, 2016
- District of Columbia Municipal Regulations (DCMR), Title 20, *Environment*, November 19, 1993, as amended, June 5, 2020
- District of Columbia Title V Air Quality Operating Permit No. 029-R1, October 29, 2019, as amended May 25, 2021
- DC DOEE FY 2014 Full Compliance Evaluation, Washington, DC, August 28 & September 4, 2014
- GPO Directive 670.58C, *Hazardous Waste Management Plan*, April 13, 2020 (SUPERSEDED)
- GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023
- GPO Directive 810.3D, *Organization and Functions of the Strategic Investment Planning Committee*, November 14, 2022
- GPO Directive 825.40A, *Continuity of Operations Plan – Employee Policy*, November 28, 2017
- GPO Occupant Emergency Plan, March 14, 2018
- GPO Spill Prevention Control and Countermeasure (SPCC) Plan, June 14, 2022
- Office of Finance SOP 11-0011, *SIPC Procedures for Capital Investment Business Case Development, Funding, Monitoring, and Assessment*, approved September 29, 2021
- Office of Finance SOP 11-0012, *Post-Implementation Return on Investment – Reporting Requirements and Procedures*, approved August 3, 2022

## INSPECTION RESULTS

### **Finding 1. Lack of training, reliance on past practices, and the absence of SOPs led GPO to continue to commit the same types of infractions for which they were assessed civil penalties of \$140,000 during the 2016 EPA and the 2014 DC DOEE inspections.**

Although GPO has directives and policies to manage its Environmental Program, and the Environmental Manager conducts weekly spot inspections of GPO facilities, they continued to identify instances of the same types of infractions during weekly spot inspections, such as open containers of VOC material. Additionally, supervisors were unaware of several trainings and procedures associated with handling hazardous materials. Supervisors instead relied on training through “word of mouth” and past practices to handle hazardous materials. Further, GPO suspended in-person training due to the COVID-19 pandemic and has not resumed in-person training. By relying on past practices, instead of structured training, internal policies, and standard operating procedures (SOPs), GPO remains at risk of committing the same types of infractions for which they were assessed civil penalties during the 2016 EPA and 2014 DOEE inspections.

### **Criteria**

- 42 U.S.C. §6901 et seq, *the Resource Conservation and Recovery Act*, (1976), as amended, October 5, 2012
- CFR, Title 40, *Protection of Environment*, June 28, 1985, as amended, July 1, 2021
- 40 CFR 262, *Conditions for Exemption for a Small Quantity Generator that Accumulates Hazardous Waste*, November 28, 2016
- DCMR, Title 20, *Environment*, November 19, 1993, as amended, June 5, 2020
- GPO Directive 670.58C, *Hazardous Waste Management Plan*, April 13, 2020 (SUPERSEDED)
- GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023
- GPO Directive 825.40A, *Continuity of Operations Plan – Employee Policy*, November 28, 2017

### **Supplemental Background**

The CFR regulations implementing RCRA require that a person who generates waste, make an accurate determination of whether it is hazardous to ensure wastes are properly managed. Furthermore, 40 CFR, *Protection of Environment*, requires that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

## GPO continues to commit the same types of infractions for which they were previously assessed civil penalties

The Environmental Manager conducts weekly spot inspections and quarterly assessments of GPO's Central Office Complex, resulting in weekly and quarterly reports. The quarterly assessments provide GPO leadership with updates of previous EPA and DOEE findings and the health of GPO's environmental program. The weekly spot inspections examine known areas of hazardous waste generation, as well as storage and recycling points. The weekly spot inspections also identify whether the supervisors are preventing and addressing environmental violations. Supervisors stated that they ensure that containers are closed and properly labeled, and that individuals wear appropriate personal protective equipment.

We shadowed the Environmental Manager during one of these weekly spot inspections and they found:

- A container of used ink cartridges and a container of used ink cans that were not marked as either hazardous or non-hazardous waste; see Exhibit 1.
- A container of ink cans without a lid. These ink cans are a type of VOC. At the time of the observation, hazardous waste was not being added or removed.<sup>9</sup>

The first observation is a violation of a regulation under RCRA, and the second observation is a violation of DCMR, Title 20, *Environment*, for which GPO paid civil penalties for similar violations during the 2016 EPA Inspection. The weekly spot inspections will be discussed further in finding 2.

Exhibit 1. Pallet of Used Ink Cans



Since the Environmental Program covers GPO facilities outside of the Central Office Complex in Washington, DC, we also visited the SPF and found:

- A container of hazardous waste in the non-hazardous waste accumulation area; see Exhibits 2 and 3 on pages nine and ten.
- A hazardous waste label that was not filled out to identify the substance; see Exhibits 2 and 3 on pages nine and ten.

Together, these two issues call into question the integrity of the other waste in the area and on the pallet: are they non-hazardous, or are they hazardous?

<sup>9</sup> This container was in the Security & Intelligent Document area, where photographs are not allowed.

**Exhibit 2. Non-Hazardous Waste Accumulation Area (SPF)**



### Exhibit 3. Non-Hazardous Waste Accumulation Pallet (SPF)



The identified issues are violations of the regulations under RCRA, which states that VSQs must identify and label all hazardous waste that they generate. Of note, GPO paid civil penalties of \$140,000 for similar violations during the 2016 EPA Inspection at the Central Office Complex.<sup>10</sup>

Further, although not required, the inspection team observed there was no workplace signage reminding employees to put lids on containers or to properly label waste at either the Central

Office Complex or at the SPF. Having these workplace posters or signs as reminders could help mitigate environmental infractions.

Although GPO initially addressed violations found during the 2014 EPA and 2016 DC DOEE inspections, and supervisors stated that they address environmental violations, the Environmental Manager continues to find similar infractions. This puts GPO at risk of receiving additional civil penalties.

<sup>10</sup> Violation types are listed in "The Issue" section, above.

## Hazardous waste training at GPO

Supervisors were not aware of training events and procedures associated with handling hazardous waste and instead relied on “word of mouth” and past practices. GPO policy requires that employees who handle hazardous waste “are thoroughly familiar with proper waste handling procedures;” however, the last documented training occurred in 2019. Hazardous waste training events were halted in March 2020 due to social distancing requirements caused by the COVID-19 outbreak and had not resumed as of February 28, 2023.

GPO Directive 670.58D states that “GPO must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.” However, since at least 1994 and until March 2023, GPO required annual refresher training on hazardous materials and waste.<sup>11</sup> In accordance with previous versions of this directive, managers, and supervisors were to ensure that employees working with hazardous waste and handling hazardous chemicals received annual refresher training. This training included:

- Proper methods for packaging hazardous waste.
- Personnel safety, including health hazards, proper equipment, and clothing for handling the various hazardous waste.

- Transporting hazardous waste with industrial trucks, which includes forklifts.<sup>12</sup>
- Proper emergency response procedures, as outlined in GPO’s OEP, in the event of a spill of hazardous waste into the air, soil, or groundwater.

Further, under the current and past versions of the directive, the Environmental Manager ensures compliance with safety training requirements.

GPO policy now matches 40 CFR, only requiring small quantity generators to be thoroughly familiar with hazardous waste management compliance. However, during fieldwork, GPO was not adhering to the directive in place that required annual refresher training for individuals that handle hazardous waste.<sup>13</sup> The last documented hazardous materials training, Handling/Storing Hazardous Materials/Waste, was held on March 26, 2019.

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<sup>11</sup> GPO Instruction 670.58, *Hazardous Waste Disposal Procedures*, August 22, 1994. In 2006, the document name was changed from instruction to directive, and until previous instructions are superseded or canceled, GPO uses the title Instruction and Directive interchangeably.

<sup>12</sup> The Occupational Safety and Health Administration defines Powered Industrial Trucks as forklifts or lift trucks, and are used in many industries, primarily to move materials.

<sup>13</sup> Violation types are listed in “The Issue” section, above.

### **Training suspended in response to COVID-19**

In response to a request from Plant Operations, the Environmental Manager scheduled hazardous waste training (Spill Response) for March 2020. However, the training was postponed due to the COVID-19 outbreak. While GPO ordered the majority of its employees to stay at home and telework, production employees at both the Central Office Complex and the SPF were considered essential workers and thus required to report for duty, albeit through staggered work shifts.<sup>14</sup> As of September 30, 2022, the Spill Response Training previously scheduled for March 2020 had yet to be rescheduled.

Although in-person trainings were suspended, production staff from the Central Office Complex and SPF were still required to work inside the GPO facilities in order to perform GPO's essential publishing functions. These essential publishing functions expose GPO employees to hazardous materials chemical leaks or spills. As GPO staff continue to use and are exposed to hazardous materials, even with the pandemic restrictions, some degree of refresher training would have been beneficial.

### **Supervisors' understanding of training requirements under the previous GPO Directive 670.58C<sup>15</sup>**

Although updated directive 670.58D removed the requirement to provide specific annual training, regular training remains important; the Environmental Manager is still finding infractions during their weekly spot inspections. During our fieldwork, when GPO was operating under GPO Directive 670.58C, none of the 12 supervisors interviewed were aware of the required annual refresher training

on hazardous waste. GPO had required this training since 1994. Further, supervisors and staff could not identify internal policies or SOPs that document how to handle hazardous materials and waste in their work areas. Instead of structured training and internal policies and SOPs, supervisors relied on "word of mouth" training and past practices.

One supervisor stated that there was no training requirement for their employees that handle hazardous waste. However, they acknowledged the hazardous materials training that was conducted in 2019. One employee stated that there was no training for environmental concerns and that they do not think it was needed. However, to be rated "Fully Successful" under their FY 2021 performance plan, the employee was supposed to complete mandatory safety training. As it was part of the employee's performance plan, the employee and supervisor should have been aware of the required mandatory safety training concerning hazardous waste that was in place at the time.

Another supervisor stated that training was not provided in a formal, structured way. If a new employee came in and needed to handle hazardous materials or waste, the supervisor would personally show them how to handle this material or waste, as part of on-the-job training. For example, if a new employee needed to discard a rag that was used to clean up isopropyl alcohol, the supervisor would show the employee the appropriate container to use. This supervisor also stated there was no written guidance, and no signed documentation to show that the supervisor trained an employee, or that the employee acknowledged that the supervisor trained them.

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<sup>14</sup> GPO Directive 825.40A, *Continuity of Operations Plan – Employee Policy*, November 28, 2017, states that GPO's Priority One essential functions are supporting the printing and electronic publishing requirements of Congress, production of the on-line Federal Register for the Office of the Federal Register, and blank passports for the Department of State.

<sup>15</sup> This directive was superseded by GPO Directive 670.58D on March 8, 2023.

With regard to forklift operators, a supervisor stated that only those individuals qualified to operate forklifts and who know how to handle hazardous materials were allowed to operate the forklift to transport hazardous waste. This supervisor also stated that all forklift drivers were aware of how to handle hazardous waste. When asked if those individuals were receiving recurring hazardous materials handler training, the supervisor stated that there were no training or certification requirements and that they rely on past practices. This contrasts with current GPO Directive 670.58D, and superseded versions dating back nearly 30 years, which require training on transporting hazardous waste material, which includes transporting by forklifts.

Without defining “thoroughly familiar” and “properly trained,” and by relying on training through “word of mouth” and past practices, staff may not appropriately handle and transport hazardous waste. Lack of training could potentially result in harm to GPO staff, facilities, and the environment. Additionally, GPO risks civil penalties for safety or environmental violations.

In summary, we assessed that the instances of the same types of infractions are caused by supervisors’ reliance on past practices to handle hazardous waste, and lack of awareness of the requirement in place at the time for annual refresher training on hazardous materials.<sup>16</sup> Further, supervisors were unable to identify internal policies or SOPs that documented how to handle hazardous materials and waste in their work areas as required by the regulatory authorities of the EPA and DC. Relying on past practices, instead of vetted SOPs, has led to ongoing inappropriate handling of hazardous materials. Without clear guidance or annual training distributed to the workforce, GPO employees are not following regulatory procedures for

handling hazardous materials. This puts GPO at risk of receiving civil penalties for the same types of infractions for which they were assessed civil penalties of \$140,000 during the 2016 EPA and the 2014 DC DOEE inspections.

## Recommendations

**Recommendation 1.** Develop and implement a hazardous waste training schedule, as well as internal policies and SOPs for supervisors and staff that handle hazardous waste. Train employees in accordance with GPO Directive 670.58D.

### Management Comments

GPO concurred with this recommendation. GPO stated that the Safety Branch will work with the Workforce Development, Education, and Training office to resume safety and environmental training. The Engineering/ Facilities Division will work with the Safety Branch to evaluate the need for clarity and definition of roles and responsibilities regarding training and other processes at the individual shop level. Finally, if necessary, further SOPs will be collaboratively developed.

### OIG Response

GPO’s concurrence and planned actions are responsive to this recommendation. To close this recommendation, the agency must provide evidence that a hazardous waste training schedule has been developed. Additionally, GPO must provide documentation that employees working with or handling hazardous waste are trained on the proper methods for handling chemical waste, and in accordance with GPO Directive 670.58D, *Hazardous Waste Management Plan*. Finally, GPO must also provide internal policies and SOPs that document how to handle hazardous materials and waste in applicable work areas.

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<sup>16</sup> The annual refresher training requirement was included in the directive that was in effect at the time of our fieldwork: GPO Directive 670.58C, *Hazardous Waste Management Plan*, April 13, 2020.

**Finding 2. GPO is maintaining pollution prevention equipment, but day- to-day guidance regarding hazardous waste management could be improved. In addition, the Environmental Manager is not apprised of GPO Capital Investment decisions to identify potential environmental impacts.**

GPO is ensuring maintenance service on pollution prevention equipment. However, GPO does not maintain a cleaning schedule for all pollution prevention equipment for cleaning in accordance with the manufacturer's specifications. Additionally, GPO does not have written descriptions of day-to-day operations that may present a risk of discharging or releasing a hazardous substance. Also, employees do not have access to GPO's emergency procedures and appropriate hazardous spill procedures at spill kits. Further, while GPO's Directives are kept current with applicable Federal Policies and Practices, GPO does not have a process in place for recording VOC emissions and daily ink usage as required by the Title V permits. Moreover, GPO does not consult the Environmental Manager on Capital Investment decisions. Finally, GPO does not conduct trend analysis for weekly spot inspection environmental infractions. Failure to adhere to the conditions governed by the Title V permit puts GPO at risk of being assessed civil penalties similar to those received during previous regulatory inspections.

**Criteria**

- 42 U.S.C. §7401 et seq, *the Clean Air Act*, (1970), as amended, November 15, 1990
- 42 U.S.C. §6901 et seq, *the Resource Conservation and Recovery Act*, (1976), as amended, October 5, 2012
- 40 CFR 112, *Oil Pollution Prevention*, July 1, 1994, as amended February 8, 2023
- 49 CFR 172, Subpart D, *Marking*, (1976), as amended, January 19, 2011
- 49 CFR 172, Subpart E, *Labeling*, (1976), as amended, December 21, 2021
- EPA Region III Multi-Media Compliance Evaluation Inspection of GPO, Washington, DC, Week of July 11-14, 2016
- DCMR, Title 20, *Environment*, November 19, 1993, as amended, June 5, 2020
- District of Columbia Title V Air Quality Operating Permit No. 029-R1, October 29, 2019, as amended May 25, 2021
- DC DOEE FY 2014 Full Compliance Evaluation, Washington, DC, August 28 & September 4, 2014
- GPO Directive 670.58C, *Hazardous Waste Management Plan*, April 13, 2020 (SUPERSEDED)
- GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023
- GPO Directive 810.3D, *Organization and Functions of the Strategic Investment Planning Committee*, November 14, 2022
- GPO Occupant Emergency Plan, March 14, 2018
- GPO Spill Prevention Control and Countermeasure (SPCC) Plan, June 14, 2022

- Office of Finance SOP 11-0011, **SIPC Procedures for Capital Investment Business Case Development, Funding, Monitoring, and Assessment**, approved September 29, 2021
- Office of Finance SOP 11-0012, *Post-Implementation Return on Investment – Reporting Requirements and Procedures*, approved August 3, 2022

## **GPO is maintaining pollution prevention equipment but we could not verify routine cleaning**

Title V of the 1990 Clean Air Act Amendments requires all major sources and some minor sources of air pollution to obtain an operating permit. The permit includes all air pollution requirements that apply to the source, including emissions limits and monitoring, record keeping, and reporting requirements. The reporting requirements include reporting the source’s compliance with the permit conditions.

GPO has a maintenance schedule for all Title V pollution prevention equipment. Each machine’s internal computer tracks when maintenance is to be performed. Maintenance of the equipment is performed on a routine and annual basis. Routine maintenance, such as adding oil, is performed by the electrical, mechanical, or plumbing shops within Plant Operations, or outsourced to a vendor, as applicable. Annual maintenance on all Title V presses is performed by the manufacturer.

In order to keep pollution prevention equipment operating safely and efficiently, it is important to clean the equipment in accordance with the manufacturer’s specifications. However, GPO does not

use cleaning checklists, or other tracking mechanisms, to ensure employees clean the equipment as specified by the manufacturer. Supervisors stated that cleaning is the operator’s responsibility, and takes place during end of shift protocols.

Supervisors also stated that there is no written end of shift cleaning protocols because cleaning is performed daily. Instead, the operators perform these cleaning protocols based on past practices. Because there are no written cleaning instructions or checklists, we were unable to verify that daily cleaning, in accordance with the manufacturer’s specifications, occurred. Not cleaning the pollution prevention equipment in accordance with the manufacturer’s specifications could cause maintenance issues and possibly lead to costly repairs. In summary, improving the procedures, tracking, and verification of routine maintenance should ensure that machines remain operable as long as possible.

## **GPO’s hazardous waste directives are current with Federal Policies and Practices**

To keep current with federal policies and practices, the Environmental Manager receives news releases and other information from the EPA, which include notices of proposed rulemaking.<sup>17</sup> The Environmental Manager also receives proposed rulemaking notifications from DC DOEE. The Environmental Manager reviews these rulemaking proposals to determine potential impacts on GPO operations and determines if GPO should provide public comment on the proposals. The Environmental Manager also notifies key stakeholders of any pending regulatory updates.

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<sup>17</sup> The proposed rule, or Notice of Proposed Rulemaking, is the official document that announces and explains the agency’s plan to address a problem or accomplish a goal. All proposed rules must be published in the Federal Register to notify the public and to give them an opportunity to submit comments. The proposed rule and the public comments received on it form the basis of the final rule.

To ensure GPO guidance pertaining to hazardous waste management is kept current with federal policies and practices, the Environmental Manager develops, reviews, and implements GPO's environmental policies. These tasks are in alignment with their position description. Additionally, and in accordance with GPO Directive 001.1D, *GPO Directives System*, January 25, 2022, which requires that all active GPO directives are reviewed for applicability at least once every four years by the originating office, the Environmental Manager ensures the GPO Hazardous Waste Management Plan Directive is reviewed and updated as required. Further, the Environmental Manager, as required by 40 CFR 112, reviews, evaluates, and updates GPO's Spill Prevention Control and Countermeasure (SPCC) Plan at least once every five years.

GPO has two documents that pertain to hazardous waste management: GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023, and the SPCC Plan, revised June 14, 2022. GPO Directive 670.58D is aligned with the RCRA and 49 CFR 172 marking and labeling requirements. For example, regulations implementing RCRA require that containers storing hazardous waste must be kept closed at all times, except when adding, removing, or consolidating waste, and GPO Directive 670.58D states the same. Labeling requirements per 49 CFR 172 state that all hazardous waste material must have the appropriate label affixed to the container, as does GPO Directive 670.58D.

The SPCC Plan is also aligned with 40 CFR 112, *Oil Pollution Prevention*. The plan establishes procedures to prevent the discharge of oil from non-transportation-related facilities as well as the release of hazardous substances in day-to-day operations. For example, 40 CFR 112 mandates a prediction of the direction and total amount of oil that could be discharged from major equipment failures. GPO's SPCC Plan includes a table that summarizes the predicted flow-direction and amount of oil

which could be discharged.

The 40 CFR 112 also requires a Site Plan Diagram. GPO's SPCC Plan has a Site Plan Diagram, which includes the locations of oil storage tanks, hazardous materials storage or handling sites, and communication and emergency response equipment sites.

### **GPO can improve by developing written descriptions of day-to-day operations that risk releasing a hazardous substance**

According to GPO supervisors, SOPs are not used in training GPO employees on the day-to-day tasks that may present a risk of discharging or releasing a hazardous substance. Specific examples are book binders' use of isopropyl alcohol, forklift operators transporting hazardous waste, and employees who perform maintenance on heating, ventilation, and air conditioning equipment.

Developing written procedures of the day-to-day operations, as well as regularly updating current guidance should ensure employees are following the most current procedures, which can in turn mitigate the risk of GPO incurring civil penalties.

### **Employees should have access to GPO's emergency and hazardous spill procedures at spill kit areas**

The Occupant Emergency Plan (OEP), "provide[s] guidance, instructions, and procedures to [GPO] personnel at all levels in the event of an emergency." This includes specific procedures in the event of a chemical spill. The SPCC is GPO's plan to address and contain spills. This plan includes specific instructions to be used upon discovering a release of material from a container, tank, or operating equipment. GPO's "If You See Something, Say Something" pocket guide contains a series of quick reaction checklists informing employees what to do in the

event of emergencies such as active shooter, earthquakes, and chemical spills or leaks.

### **Employees do not have access to GPO's Occupant Emergency Plan**

While GPO's Hazardous Waste Management Plan is available to supervisors and employees, the OEP is not readily accessible to all personnel who may need it, due to the perceived sensitivity of the document. Specifically, the GPO official responsible for this document stated that the OEP is law enforcement sensitive.<sup>18</sup> However, there are no markings or labels on the OEP indicating that it is a sensitive document. In draft form, the Elevator Branch, Medical Branch, and Chief Information Officer were sent a copy for their input and coordination. Once completed, a copy of the plan was sent to the then Acting Deputy Director, Chief of Staff, Chief Information Officer, and one GPO tenant organization.<sup>19</sup> According to one GPO official, the OEP was made available to Security Services personnel. Of note, the OEP document was shared with an agency outside of GPO, without any sensitivity marking or labels, even though the GPO official stated that the document is law enforcement sensitive. However, at no point was the OEP sent to GPO employees that may need to perform specific duties outlined in the plan, even though the OEP "provide[s] guidance, instructions, and procedures to [GPO] personnel at all levels..."

Further, a GPO official stated that in lieu of providing the OEP to personnel at all levels, the Safety Branch created and distributed an "If You See Something, Say Something" pocket guide, and considers the pocket guide an appropriate substitution for the OEP. However, the pocket guide does not provide employees with specific duties to respond appropriately in the event of an emergency. For example,

**Figure 3. Pocket Guide Example**

**CHEMICAL SPILL OR LEAK**

- SOUND THE ALARM!
- Notify others in the area as you protect yourself
- Notify the Control Center at #.#### (###.###.####) from a safe location and provide:
  - Location of the spill
  - Type of chemical spilled, if known
  - Known hazards of the chemical, if known
  - Quantity spilled
  - Number and extent of any injuries
  - If the spill has spread into a drain or ventilation system
- Attend to injured or contaminated persons without risking your safety
- Turn off ignition and heat sources without risking your safety
- Close doors to affected area
- Keep non-emergency persons from entering the area
- Assist emergency personnel as requested

**CAUTION: Do not rush to rescue victims; assess the situation before attempting rescue.**

the OEP provides specific instructions for the initial first responder to follow in the event of a leak or spill, as well as instructions on how to isolate the affected area. The OEP also specifies sustained actions to be taken by supervisors, the Power Branch, the Hazmat Spill Team, as well as cleanup procedures. The pocket guide simply provides a brief overview of how to report the incident; see Figure 3. The pocket guide is a useful tool for employees to report a chemical spill or leak. However, it does not include instructions regarding how to contain and clean up the chemical spill or leak.

Without clear OEP guidance distributed to the entire workforce, GPO risks inappropriate emergency response. In a worst-case scenario, this could result in serious bodily injury or loss of life.

<sup>18</sup> Law Enforcement Sensitive is sensitive, unclassified information where disclosure of said information could cause harm to law enforcement activities or jeopardize investigations or operations.

<sup>19</sup> The tenant organization was the Office of the Federal Register.

***Procedures to clean up hazardous spills are not located at the spill kit areas***

GPO's SPCC Plan outlines the emergency procedures to follow in the event of a release of hazardous substances. Procedures include using spill kits to contain and clean up hazardous materials. The specific procedures identified in the SPCC for containing chemical spills or leaks are not available at the spill kit sites. GPO has 11 spill kits located throughout the Central Office Complex, including in the vicinity of GPO's printing presses. These spill kits contain items such as absorbent materials, protective clothing, and spill control pillows. Having readily accessible instructions located at the spill kit sites could result in timelier mitigation to contain and clean up a hazardous material spill.

**GPO does not consistently maintain Title V compliance records**

One of the Title V permit requirements is to maintain the following daily records for no less than five years:<sup>20</sup>

- Content of each VOC-containing material used in conjunction with the equipment each day.
- The quantity of each VOC material used on the equipment each day.
- The calculated quantity of VOC emitted from each unit each day.
- The daily quantity of VOC emitted from the units, aggregated with the daily quantity of VOC emitted from all other equipment at the facility that is not otherwise covered.

The major air pollutant from the GPO Central Office Complex facility is VOC emissions from ink, solvent, and various cleaning

solutions, used in several sheet-fed offset and lithographic presses and other equipment at the facility. GPO does not record daily VOC emissions and daily ink usage as required by the Title V permit. Instead, GPO records monthly emissions and ink usage and then estimates the average daily usage for the entire month. One employee stated that they were unaware of the daily recording requirement and implied that recording daily usage would take too long and be time-consuming. The employee also stated that if they had to record daily VOC usage, it would take their entire day. In its semi-annual and annual compliance reports to the DC DOEE, GPO notes that it does not record daily VOC emissions and ink usage. The Environmental Manager stated that DC DOEE has never responded to one of the semi-annual or annual compliance reports regarding the required daily VOC usage recording. Contrary to the employee's perspective, the Environmental Manager also stated that daily VOC recording is not an impossible task, as others in the printing industry report daily usage and emissions. Essentially, a proper risk assessment and subsequent decision should be made.

In summary, GPO does not have a process in place for recording VOC emissions and daily ink usage as required by the Title V permits. Records are not consistently maintained because not all employees are aware of the daily recording requirement. GPO's non-compliance with the terms and conditions of the permit that require daily record keeping of VOC emissions and daily ink usage may constitute a violation of the DC regulations and is grounds for enforcement action, permit revocation, permit modification, or denial of permit renewal. Not adhering to the conditions of the permit to report daily VOC emissions could also lead to civil penalties by DC DOEE.

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<sup>20</sup> This DC Title V Air Quality Operating Permit No. 029-R1 requirement is for Press Group 97 (Silk Screen Press), 40 (Non-web Coater Press), and 69 (Web Inkjet Press).

## The Environmental Manager is not apprised of GPO's Capital Investment decisions

GPO's Strategic Investment Planning Committee (SIPC) is responsible for providing effective capital programming through long-range planning and an integrated budget process to achieve agency performance goals in a cost-effective manner. The SIPC recommends investment proposals to the Director in a coordinated manner, within a strategic framework. One of its responsibilities and duties is to address all relevant factors of an investment proposal, such as environmental impacts.<sup>21</sup> However, GPO does not have a process to ensure the Environmental Manager is consulted for environmental risk when making Capital Investment decisions. Specifically, environmental impacts are not included in the Office of Finance's SOP 11-0011, which supports business case development and identifying risks.<sup>22</sup> Nor are the environmental impacts included in the Office of Finance's SOP 11-0012, which provides guidance on performing return on investment reports after a capital investment is implemented, including identifying any variance between the approved project cost and the final project cost.<sup>23</sup> Including the Environmental Manager at the planning stage for all Capital Investments would allow the Environmental Manager to identify potential environmental impacts, which, in turn, could prevent GPO from being assessed civil penalties due to operating equipment without a permit.

To illustrate the above point, we provide this real-world example. In 2019, Plant Operations

purchased and permitted five new presses to improve printing capabilities. Plant Operations did not involve the Environmental Manager when they subsequently purchased a sixth printer without updating the conditions of the permit to include the additional printer. The Environmental Manager noticed the unpermitted sixth printer in operation during a weekly spot inspection of Plant Operations. The Environmental Manager escalated this non-compliance issue to GPO leadership, and the Deputy Director responsibly paused operations on the sixth press until it was properly permitted.

While this instance demonstrates the success of the Environmental Manager's weekly checks and GPO leadership's prompt action, it also presents an opportunity to include the Environmental Manager earlier in the process. At the time of the inspection, GPO did not have a process to ensure the Environmental Manager was consulted about relevant Capital Investments. Operating the sixth printer, unpermitted, could have resulted in a Title V permit violation, exposing GPO to potential civil penalties.

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<sup>21</sup> GPO Directive 810.3D, *Organization and Functions of the Strategic Investment Planning Committee*, November 14, 2022.

<sup>22</sup> Office of Finance SOP 11-0011, *SIPC Procedures for Capital Investment Business Case Development, Funding, Monitoring, and Assessment*, approved September 29, 2021

<sup>23</sup> Office of Finance SOP 11-0012, *Post-Implementation Return on Investment – Reporting Requirements and Procedures*, approved August 3, 2022.

## **GPO could improve risk management by conducting trend analysis on weekly inspections**

The Environmental Manager inspects known areas of hazardous waste generation on a weekly basis. These weekly inspections are called spot inspections and focus on hazardous waste compliance and identification of hazardous waste ready for disposal. If an instance of non-compliance is found, the Environmental Manager notifies the appropriate supervisor or other personnel to address the issue. For example, if a container of ink cans was found without a lid, this would be immediately addressed. After conducting the spot inspection, the Environmental Manager creates a “spot inspection discrepancy” report and distributes it to the appropriate Business Unit for action and record keeping. This report is added to a Safety Branch database and briefed monthly to GPO leadership. We commend the Environmental Manager for the spot checks. One way to upgrade the checks is to conduct trend analysis, which could serve as a risk management tool to identify patterns and address root causes of repeat violations.

The Environmental Manager follows up with the Business Units every 30 days until the reported issues are addressed. A sample review of the Environmental Manager’s spot inspection reports revealed that during 2021, there were eight non-compliance issues dealing specifically with improper labeling of hazardous waste, a violation of 49 CFR 172. During a 3-week period in 2021, the Environmental Manager identified three open containers of VOC materials, violations of the conditions of the Title V Permit as well as DCMR Title 20. These improper labeling and open container violations are the same types of non-compliance issues cited during the 2016 EPA inspection.

Neither the Environmental Manager nor the Business Units conduct trend analysis to identify any patterns of commonly repeated violations, nor to identify and address the root cause of why or how those violations continue to occur. This can result in repetitive non-compliance issues, as the Environmental Manager spends their time identifying repeat issues, and the Business Units spend their time addressing these repeat issues.

Without analyzing and addressing the foundation of these repeat issues, GPO is at risk of incurring civil penalties for non-compliance with regulatory guidance, for which they were previously fined during the 2016 EPA and 2014 DC DOEE inspections.



## Recommendations

**Recommendation 2.** Develop and implement end-of-day cleaning procedures that are in alignment with manufacturer specifications, and verify that end-of-day cleaning is performed on all pollution prevention equipment.

### **Management Comments**

GPO concurred with this recommendation. GPO stated that Engineering, Environmental, Plant Operations, and Security & Intelligent Documents will form teams within their particular Departments to identify specific pollution prevention equipment that needs periodic cleaning procedures. Each team will create periodic cleaning procedures for the applicable pollution prevention equipment. The teams will then meet to standardize, share best practices, and implement the new procedures.

### **OIG Response**

GPO's concurrence and planned actions are responsive to this recommendation. To close this recommendation, the agency must provide the procedures for end-of-day cleaning that are aligned with manufacturer specifications, and verification that the cleaning is performed daily.

**Recommendation 3.** Develop and implement written procedures for handling hazardous materials for day-to-day operations that could release hazardous substances.

### **Management Comments**

GPO concurred with this recommendation. GPO stated that although there are no regulatory requirements for this recommendation, the agency can develop written procedures in addition to accomplishing improvements to the continuous in-person training events. The Environmental Manager is currently in discussions with a vendor to provide spill response training that was canceled in March 2020 due to social distancing requirements caused by the COVID-19 outbreak.

### **OIG Response**

GPO's concurrence and planned actions are responsive to this recommendation. To close this recommendation, the agency must identify the day-to-day operations that could release hazardous substances and must provide documentation of the written procedures for handling those hazardous materials.



**Recommendation 4.** At each spill kit located throughout the GPO Central Office Complex, provide GPO's Occupant Emergency Plan (or excerpts) that address the management of hazardous waste, including the procedures for responding to hazardous material leaks and spills.

#### **Management Comments**

GPO concurred with this recommendation. GPO stated that the Safety Branch and Security & Intelligent Documents purchased large vinyl signs with simple steps for containing and cleaning hazardous material leaks and spills. The Carpentry Shop installed these signs at each spill kit location. Additionally, the Environmental Manager printed and laminated page 17 of the GPO SPCC Plan that provides more detailed instructions (or excerpts) and placed them in all the Spill Kits.

GPO further stated that since the OEP is Law Enforcement sensitive, its distribution is restricted. Therefore, all references to the OEP were removed from the recently revised GPO Directive 670.58D, *Hazardous Waste Management Plan*. The Directive now refers employees to the GPO SPCC Plan, readily available to all employees through the Safety Branch intranet website.

#### **OIG Response**

GPO's concurrence and planned actions to post signs that include the simple steps for containing hazardous materials leaks and spills are responsive to this recommendation. However, the inspection team conducted a walk-through of GPO facilities on June 6, 2023, and found that two of the three spill kits sampled did not have the requisite signage posted. To close this recommendation, the agency needs to ensure that all spill kits are fitted with the appropriate signage with the steps for containing and cleaning hazardous material leaks and spills.

**Recommendation 5.** Record daily VOC emissions for Press Groups 97, 40, and 69. If unable to follow permit guidance, work with the DC DOEE to amend permits to eliminate the daily recording requirement, or for an exception to the policy with regard to the daily VOC recording requirements outlined in the Title V permits.

#### **Management Comments**

GPO concurred with this recommendation in part. GPO stated that several actions have occurred during the course of this inspection to resolve these Title V Permit condition deviations. Specifically:

1. Plant and SID decommissioned their Group 97 BecMar Classic General Sheet-fed Silk Screen presses. On May 5, 2022, the Environmental Manager submitted an application to DOEE to remove the presses from the Title V Permit.
2. The Group 40 Kompac Kwick Finish Coater was last used on January 4, 2021, and Plant Operations will begin the process of decommissioning this piece of equipment by June 2023.
3. Plant Operations and the Environmental Manager worked collaboratively with the Group 69 Inkjet press manufacturer to have each press push daily usage reports to the Environmental Manager via email. Since August 25, 2022, the Environmental Manager has received the daily push emails. These email reports are converted to an Emission Tracker within the Environmental Programs Office to calculate daily emissions per permit requirements.

The agency also stated that upon decommissioning the Group 40 Press, the Agency will fully comply with all applicable Title V Permit conditions, thereby addressing this recommendation.

**OIG Response**

GPO’s partial concurrence and planned actions are responsive to this recommendation. To close this recommendation, GPO must provide evidence of the Emission Tracker that calculates and records the daily quantity of VOC emitted per permit requirements.

**Recommendation 6.** Incorporate the Environmental Manager into the planning phase of all Capital Investments to ensure potential environmental impacts are addressed.<sup>24</sup>

**Management Comments**

GPO concurred with this recommendation. GPO stated that Finance will take the necessary action to include the Safety Staff/ Environmental Manager in all SIPC meetings to ensure environmental impact risks are evaluated before the Director approves capital investment projects. GPO further stated that they will update all pertinent SOPs and implement this action for the FY 2024 capital budget planning process. Additionally, SOPs 11-0011 and 11-0012 will be updated to include environmental impact risk as a consideration in evaluating business cases.

**OIG Response**

GPO’s concurrence and planned actions are responsive to this recommendation. To close this recommendation, GPO must show evidence of the Environmental Manager’s evaluation of environmental impact risks for all capital investment projects. GPO must also provide the updated SOPs.

**Recommendation 7.** Identify and track hazardous waste non-compliance trends.

**Management Comments**

GPO concurred with this recommendation. GPO stated that the Safety Branch uses an internal Microsoft Access database to document, track to closure, and trend non- compliance violations. Starting with the 4th Quarter of FY23, the Environmental Manager will evaluate noted hazardous waste discrepancies to identify if any trends are occurring and provide trend analysis data to the GPO Executive Team through the Quarterly Environmental Programs Health Reports.

**OIG Response**

GPO’s concurrence and planned actions are responsive to this recommendation. To close this recommendation, GPO must provide documentation that the Environmental Manager is tracking hazardous waste non-compliance trends.

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<sup>24</sup> This recommendation aligns with Recommendation 1 from our Report Number A-2021-10, *Government Publishing Office Capital Investments*, dated August 20, 2021.

### **Finding 3. GPO's Environmental Manager needs an additional full-time employee in order to provide Plant Operations and Security & Intelligent Documents with expert guidance and oversight.**

During the course of the inspection, we noted that the Environmental Manager receives support from contracting staff and has sufficient equipment and training to manage the environmental program; however, program effectiveness could be increased with additional support personnel. To that end GPO is in the process of hiring an environmental protection specialist; at the time of this report, the position has been announced on USAJobs. Until this position is filled, the Environmental Manager will continue to focus their efforts on administrative tasks.

#### **Criteria**

- 42 U.S.C. §6901 et seq, *the Resource Conservation and Recovery Act*, (1976), as amended, October 5, 2012
- GPO Directive 670.58C, *Hazardous Waste Management Plan*, April 13, 2020 (SUPERSEDED)
- GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023
- GPO Directive 810.3D, *Organization and Functions of the Strategic Investment Planning Committee*, November 14, 2022

### **Contracting Staff**

The Environmental Manager is supported by two subject matter expert environmental consultants for up to 100 days per year. Beginning in FY 2018, GPO contracted with a vendor to be the agency's environmental consultant, mainly to address environmental compliance and permits, and to provide expertise regarding hazardous materials, wastewater, and refrigerant management. The initial contract in FY 2018 was for 35 days. The contract was increased to 50 days in FY 2019. The contract was then increased to 100 days for FYs 2020, 2021, and 2022, which appeared sufficient for the agency's environmental needs. The Environmental Manager relies heavily on these contractors for their expertise with air pollution equipment and stated that the contracted support has been helpful.

The environmental consultants:

- provide a database to record and track emissions;
- conduct quality control checks on data;
- advise on, draft, and help the Environmental Manager maintain compliance with Title V permits; and
- provide technical support, including answering any of the Environmental Manager's environmental related questions.

With the environmental consulting contractors focused on environmental compliance and Title V permits, the Environmental Manager has been able to focus on other critical tasks, such as hazardous waste disposal, recycling, weekly spot inspections, and managing the asbestos program.

## Equipment and Training

The Environmental Manager stated that they receive sufficient funding, adequate equipment and training, and previous funding increase requests were approved. With regard to equipment, the Environmental Manager stated they have been able to get what was needed, specifically with regard to occasional equipment purchases or rentals. For example, the Environmental Manager was able to rent a Geiger counter to confirm there were no radioactive materials to remove outdated electrical equipment.

With regard to training, the Environmental Manager stated that their training requests are approved, even if they exceed the annual budgeted amount, especially if there is a potential lapse in certification. Some of the training required for the Environmental Manager to maintain certifications include:

- Contracting Officer's Representative Course
- EPA's Asbestos Inspection Course
- Clean Air Compliance Manager Course
- Air Quality Permitting and Reporting Course
- Hazardous Waste Compliance Manager Course

The Environmental Manager believes they receive sufficient funding because the current Director and Deputy Director are focused on mitigation and risk management. In addition to providing sufficient funding, other actions show GPO leadership's commitment to mitigation and risk management. For example, when the Environmental Manager realized GPO was operating six presses, but was only permitted to operate five, the Deputy Director stopped operating the sixth press until it was properly permitted. This action mitigated the risk of operating unpermitted equipment and potentially saved GPO thousands of dollars in civil penalties.

Additionally, in support of the environmental program, the Deputy Director created a pilot program for purchase cards that increased the single purchase limit, that is, the amount that the purchaser could spend in one transaction. This allowed the Environmental Manager to more timely address environmental program needs such as paying for the removal and disposal of hazardous materials.

By providing the Environmental Office with the appropriate equipment and training resources, GPO should be able to meet their permit requirements and address any environmental issues. Addressing environmental issues could avoid injury to personnel, damage to GPO property, and civil penalties levied upon GPO by its regulatory authorities, the EPA, and DC.

## **Additional FTE needed**

The Environmental Manager could administer the environmental program more effectively with additional support personnel. As part of the Safety Branch, the Environmental Office protects GPO assets while sustaining critical operations. GPO assets include over 1,600 employees and approximately two million square feet of real estate. The Environmental Office is currently staffed with one FTE, the Environmental Manager, who is sometimes assisted by the Safety Manager. This means one person, sometimes assisted by their manager, is responsible for providing environmental oversight and care for all of GPO's assets.



## ***Asbestos Management is time-consuming***

In addition to performing critical tasks such as conducting weekly spot inspections, developing an inventory of GPO air emissions and emission sources, ensuring all environmental issues are addressed within GPO facilities, and hazardous waste disposal, the Environmental Manager manages GPO's asbestos program. Since the GPO Central Office Complex resides in a historical complex of buildings constructed before 1980, GPO is vigilant about potential asbestos whenever repairing or updating an area of the building. This includes identifying and properly removing materials containing asbestos, such as insulation, to make sure it is not released into the air. Managing the asbestos program takes up approximately 40 percent of the Environmental Manager's time.

The Safety Manager and the Environmental Manager both expressed that they do not think the Environmental Office is effectively staffed to protect GPO's many assets while sustaining critical operations. Instead of performing analytical and program management tasks, such as trend analysis, these two managers perform time-consuming administrative tasks, such as sorting, packaging, and mailing batteries and smoke detectors. The batteries must be sorted by type and disposed of accordingly because batteries contain hazardous materials. The smoke detectors have a radioactive element and must be packed appropriately before being shipped for disposal. They believe that the agency could benefit from hiring one additional FTE to assist with administrative tasks such as checking containers for lids, observing hazardous waste collection, escorting contractors, and accompanying people to get their GPO visitor badge, thereby allowing the Environmental Manager to focus more on analytical and program management tasks.

***GPO has already authorized and is recruiting the additional FTE***

The Environmental Manager’s quarterly health reports to agency leadership included a request for an additional FTE as early as December 31, 2019. The report stated, “[t]he overall health of the GPO Environmental Programs is on track and good, but could show more rapid improvement with some much-needed assistance from an additional FTE.” The support of an additional FTE could also allow the Safety Manager to focus on their primary tasks, such as providing employee safety and awareness training and conducting the annual safety assessment for all GPO facilities, instead of administrative tasks assisting the Environmental Manager. The request for an additional FTE moved forward in the summer of 2022, during our fieldwork. In April 2023, GPO was in the process of filling this position, with public announcements on USAJobs. Therefore, we did not submit a recommendation for this finding. However, until it is filled, the Environmental Manager and the Safety Manager continue to focus their efforts on administrative tasks instead of critical tasks of program management activities and analyses.<sup>25</sup>



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<sup>25</sup> In May 2023, GPO filled the environmental protection specialist FTE position.

## Appendix A. Table of Recommendations

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
<p>1. Develop and implement a hazardous waste training schedule, as well as internal policies and SOPs for supervisors and staff that handle hazardous waste, to ensure employees are “thoroughly familiar” and “properly trained” in accordance with GPO Directive 670.58D.</p>	<p>GPO will resume safety and environmental training, including hazardous waste training. Supervisors of waste-generating activities will ensure that employees working with or handling hazardous waste in their area attend this training for awareness and knowledge of the proper methods for handling chemical waste. GPO will develop additional training SOPs as necessary.</p>	Open	<p>Monetary – Cost Avoidance</p> <p><i>Providing training to all employees that handle hazardous waste will help GPO avoid civil penalties for environmental compliance infractions. GPO paid \$140,000 in civil penalties during a previous regulatory inspection.</i></p> <p>Nonmonetary - Improve management controls, improve systems/ processes, initiate best business practices</p> <p><i>Ensuring that employees working with or handling hazardous waste in their area have the proper training will help GPO maintain its position as good stewards of the environment.</i></p>
<p>2. Develop and implement end of day cleaning procedures that are in alignment with manufacturer specifications, and verify that end of day cleaning is performed on all pollution prevention equipment.</p>	<p>Engineering, Environmental, Plant, and SID will form teams within their particular Departments to identify specific pollution prevention equipment that needs periodic cleaning procedures. Each team will create periodic cleaning procedures for the applicable pollution prevention equipment.</p>	Open	<p>Monetary – Cost Avoidance</p> <p><i>Cleaning pollution prevention equipment in accordance to the manufacturer’s specifications will help avoid unnecessary maintenance costs.</i></p> <p>Nonmonetary – Improve management controls, improve systems/ processes</p> <p><i>Cleaning pollution prevention equipment in accordance with the manufacturer’s specifications will help ensure the safety of machine operators, as well as extend the operating life of the equipment.</i></p>

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
<p>3. Develop and implement written procedures for handling hazardous materials for day-to-day operations that could release hazardous substances.</p>	<p>GPO will resume monthly in-person safety and environmental training courses, to include annual training on day-to-day operations that could release hazardous substances for all employees who handle hazardous materials.</p>	<p>Open</p>	<p>Nonmonetary – Improve management controls, improve systems/ processes, initiate best business practices</p> <p><i>Developing and implementing procedures for handling hazardous materials will help prevent the risk of discharging or releasing a hazardous substance into the environment. This will help GPO maintain its position as good stewards of the environment.</i></p>
<p>4. At each spill kit located throughout the GPO Central Office Complex, provide GPO’s Occupant Emergency Plan (or excerpts) that address the management of hazardous waste, including the procedures for responding to hazardous material leaks and spills.</p>	<p>At each spill kit location, GPO installed signs that included simple steps for containing and cleaning hazardous material leaks and spills.</p>	<p>Open</p>	<p>Nonmonetary – Improve management controls</p> <p><i>Having readily accessible instructions located at the spill kit sites could result in timelier mitigation to contain and clean up a hazardous material spill. This will help GPO maintain its position as good stewards of the environment.</i></p>
<p>5. Record daily VOC emissions for Press Groups 97, 40, and 69. If unable to follow permit guidance, work with the DC DOEE to amend permits to eliminate the daily recording requirement, or for an exception to the policy with regard to the daily VOC recording requirements outlined in the Title V permits.</p>	<p>GPO has decommissioned their group 97 presses and is in the process of decommissioning their group 40 presses. The Environmental Manager is now receiving a daily usage report from the group 69 presses. Each of these press groups has a daily recording requirement.</p>	<p>Open</p>	<p>Monetary – Cost avoidance/Avoid violations of Law or Regulations</p> <p><i>Failure to adhere to the conditions governed by the Title V permit puts GPO at risk of being assessed civil penalties similar to those received during previous regulatory inspections. GPO paid \$140,000 in civil penalties during a previous regulatory inspection.</i></p>

Recommendation	Management Response	Status	Return on Investment
Director, GPO			
<p>6. Incorporate the Environmental Manager into the planning phase of all Capital Investments to ensure potential environmental impacts are addressed.</p>	<p>GPO will take the necessary action to include the Safety Staff/Environmental Manager in all Strategic Investment Planning Committee (SIPC) meetings to ensure environmental impact risks are evaluated before the Director approves capital investment projects. SOPs 11-0011 and 11- 0012 will be updated, to include environmental impact risk as a consideration in evaluating business cases.</p>	<p>Open</p>	<p>Monetary – Cost avoidance/Improve GPO processes</p> <p><i>Including the Environmental Manager at the planning stage for all Capital Investments would allow the Environmental Manager to identify potential environmental impacts, which, in turn, could prevent GPO from being assessed civil penalties due to operating equipment without a permit. GPO paid \$140,000 in civil penalties during a previous regulatory inspection.</i></p>
<p>7. Identify and track hazardous waste non-compliance trends.</p>	<p>The Environmental Manager will evaluate noted hazardous waste discrepancies to identify if any trends are occurring and provide trend analysis data to the GPO Executive Team through the Quarterly Environmental Programs Health Reports.</p>	<p>Open</p>	<p>Monetary – Cost avoidance/ Improve program results and provide analysis to decision- makers</p> <p><i>By identifying non-compliance trends, GPO can identify root causes that address the foundation of repeat infractions. By not conducting trend analysis, GPO is at risk of incurring civil penalties for non- compliance with regulatory guidance. GPO paid \$140,000 in civil penalties during a previous regulatory inspection.</i></p>

## Appendix B. Scope and Methodology

### Scope

Our team of inspectors performed this inspection of GPO's Environmental Program. Our inspection focused on Security Services and the Business Units that maintain pollution prevention equipment, generate or handle waste, and provide and document training regarding maintaining equipment and generating or handling waste. We reviewed GPO's compliance with the federal criteria for a timeframe of five prior years from the date of the announcement of the inspection.

### Methodology

The inspection team:

- Interviewed:
  - The Chief Security Officer
  - The Safety Manager
  - The Environmental Manager
  - Managers and Supervisors within:
    - Plant Operations
    - Security & Intelligent Documents
    - Secure Production Facility at Stennis
- Reviewed federal policies, the District of Columbia Municipal Regulations, as well as applicable GPO Directives.
- Performed walkthroughs of the GPO Central Office Complex as well as the Secure Production Facility at Stennis.
- Reviewed previous 2016 EPA and FY 2014 DC DOEE reports.

This inspection was conducted in accordance with the *Quality Standards for Inspections and Evaluations of the Council of the Inspectors General on Integrity and Efficiency*, January 2012 (Blue Book). Note: This inspection began before the updated 2020 Blue Book implementation was required, so it was completed in accordance with the 2012 procedures.

## Appendix C. Abbreviations

CFR	Code of Federal Regulations
DC	District of Columbia
DCMR	District of Columbia Municipal Regulations
DOEE	Department of Energy & Environment
EPA	U.S. Environmental Protection Agency
FY	fiscal year
FTE	Full-Time Employee
GPO	U.S. Government Publishing Office
OEP	Occupant Emergency Plan
OIG	Office of the Inspector General
RCRA	Resource Conservation and Recovery Act
SIPC	Strategic Investment Planning Committee
SOP	Standard Operating Procedure
SPCC	Spill Prevention Control and Countermeasure
SPF	Secure Production Facility [Stennis]
SQG	Small Quantity Generator
U.S.C.	United States Code
VOC	Volatile Organic Compound
VSQG	Very Small Quantity Generator

## Appendix D. Key Environmental Policies Defined

### Major Environmental Legislation

**CFR, Title 40, *Protection of Environment*, June 28, 1985, as amended, July 1, 2021.**<sup>26</sup> Regulations are codified annually in the CFR. Title 40 is the section of the CFR that deals with the EPA's mission of protecting human health and the environment. The EPA permits coordinated and effective governmental action to assure the protection of the environment by abating and controlling pollution on a systematic basis. The EPA conducts a variety of research, monitoring, standard setting, and enforcement activities related to pollution abatement and control to provide for the treatment of the environment as a single interrelated system. Complementary to these activities are the Agency's coordination and support of research and antipollution activities carried out by State and local governments, private and public groups, individuals, and educational institutions. The EPA reinforces efforts among other Federal agencies with respect to the impact of their operations on the environment.

**42 U.S.C. §7401 et seq, *the Clean Air Act*, (1970), as amended, November 15, 1990.**<sup>27</sup> The Clean Air Act (CAA) is the comprehensive federal law that regulates air emissions from stationary and mobile sources. Among other things, this law authorizes the EPA to establish National Ambient Air Quality Standards to protect public health and public welfare and to regulate emissions of hazardous air pollutants.

**42 U.S.C. §6901 et seq, *the Resource Conservation and Recovery Act*, (1976), as amended, October 5, 2012.**<sup>28</sup> The Resource Conservation and Recovery Act (RCRA) gives the EPA the authority to control hazardous waste from cradle to grave. This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also set forth a framework for the management of non-hazardous solid wastes.

### District of Columbia Municipal Regulations

**DCMR, Title 20, *Environment*, November 19, 1993, as amended, June 5, 2020.**<sup>29</sup> This regulation states that a permit from the District of Columbia shall be obtained before any person shall construct a new stationary source, modify an existing stationary source, or install or modify any air pollution control device on a stationary source.

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<sup>26</sup> 40 CFR Table of Contents (govinfo.gov)

<sup>27</sup> US Code Title 42 Chapter 85, 2020 (govinfo.gov)

<sup>28</sup> US Code Title 42 Chapter 82, 2019 (govinfo.gov)

<sup>29</sup> DC Municipal Regulations, Title 20

## GPO Environmental Governance

**GPO Directive 670.58D, *Hazardous Waste Management Plan*, March 8, 2023.**<sup>30</sup> This directive established procedures to ensure that hazardous waste is appropriately identified and handled safely in accordance with applicable regulations to protect human health and the environment. The Directive applies to all GPO components that generate or handle hazardous waste within the Central Office Complex. GPO satellite activities should contact the Environmental Manager if they generate hazardous waste so they can develop procedures to comply with this Directive, EPA regulations, and local environmental guidelines.

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<sup>30</sup> This directive superseded GPO Directive 670.58C, *Hazardous Waste Manage Plan*, April 13, 2020.

## Appendix E. Management Comments

HUGH NATHANIAL HALPERN

Director

### MEMORANDUM

**Date:** May 25, 2023

**To:** Inspector General

**Subject:** Agency Response to the OIG Draft Report on the Environmental Program  
Inspection 21-02-II

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Thank you for the opportunity to offer the Agency's response to the Draft Report on Environmental Program Inspection 21-02-II.

#### In General

The Office of the Inspector General (OIG) Environmental Program Inspection 21-02-II draft report made several important recommendations for environmental compliance improvements that will be responded to in this memorandum. The stated scope of the OIG inspection was to "examine how GPO addressed violations identified during the 2016 U.S. Environmental Protection Agency (EPA) and the 2014 District of Columbia (DC) Department of Energy & Environment (DOEE) inspections." The Agency took the 2014 and 2016 inspection results seriously and initiated numerous improvements that will be outlined below for reference.

Since the 2014 DOEE and 2016 EPA inspections, GPO committed considerable resources – including staffing – to improve its environmental compliance program. Starting with environmental oversight, the single Environmental Program Manager position that existed in 2016 now has assistance and expertise through Environmental Consultants, which bring outstanding know-how and an objective review to GPO with a 100-days of support per year contract established in 2018. Additionally, the newly hired PG-7/9/11 Environmental Protection Specialist will significantly aid the Environmental Manager in supporting contracts and inspecting the facilities to quickly identify and correct issues before they rise to the level of a compliance violation.

The Environmental Management Cost Code 9913 increased 683 percent from \$72,150 in 2016 to \$565,457 in 2023. This figure covers the daily operations of the Environmental Programs Office, as stated below. It does not include annual costs associated with staffing, which has also increased with the addition of the PG-7/9/11. This additional funding supports asbestos/lead abatement, environmental consultants, an online Air Emissions Tracker Database, bi-annual safe drinking water testing, increased permitting fees, oil recycling, and additional disposal services for industrial chemical hazardous and non-hazardous wastes.

In 2021, the Agency made a significant improvement to the timely payment of the various environmental permit fees by enrolling the Environmental Manager into a GPO pilot program to increase the Government Purchase Card single purchase limit from \$2,500.00 to \$24,999.99. This has substantially reduced the time and effort needed to pay continually rising environmental fees through the Acquisitions Purchase Request process. This change has eliminated late fees for failing to meet payment deadlines and has fostered better working relationships with the various payees.

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Additionally, the Environmental Programs Office has worked to build better relationships with the other agency Business Units through more transparent communication, such as the Quarterly Environmental Programs Health Report that began in 2020 and through participation in the Quarterly Labor-Management Safety Committee meetings as a presenter. This relationship-building effort has also been extended to external regulatory agencies with oversight authority over GPO. Specifically, GPO had frequent in-person meetings at DOEE with their permit writing staff in 2018 and 2019. This resulted in DOEE issuing a Title V Operating permit that was mutually agreed upon by both parties. Another critical improvement related to our interaction with regulatory agencies was the creation of GPO Directive 670.68, Guidelines for External Regulatory and Independent Inspections, in 2019. During the 2014 and 2016 inspections, GPO had no clear guidance on managing an external inspection. This lack of guidance may have contributed to the severity of the violations. Environmental, Plant and SID worked collaboratively to create instructions to address this. A subsequent mock exercise to test the procedures and multiple external compliance inspections have been managed in accordance with this Directive and have resulted in far better outcomes than the 2014 and 2016 inspections.

GPO has invested tens of millions of dollars in capital improvements since 2016, significantly improving its environmental stewardship. Some significant items are:

- 1) New dust collection systems in Buildings C and D, with additional funding approved to replace the aging baling systems.
- 2) New Muller-Martini and Horizon book binding lines that produce less production and maintenance waste.
- 3) Six (6) new Inkjet presses that use much more environmentally friendly raw materials, produce significantly less waste than traditional web presses, and require no natural gas-fired pollution control equipment. By moving production to the Inkjet presses and decommissioning the four (4) web presses, GPO has reduced its annual emissions of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs) by nearly 25 percent.
- 4) Leveraging new printing technologies and materials has allowed Plant and SID to stop using silk screen presses in 2022. Shifting production away from just those two presses alone has accounted for a decrease of nearly 19 tons of air pollution per year within the Central Complex.
- 5) The shift to digital pre-press operations has resulted in far less use of the chemicals and processes of traditional plate-making. This has reduced the industrial waste the Pre-Press section legally discharges into the sewer system by approximately 70%.

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Finally, and to specifically address findings in both the 2014 DC DOEE and the 2016 EPA inspections, we're provide the following information:

In 2014, the DC DOEE inspection noted two (2) violations that resulted in \$4,000 in civil penalties for:

- 1) Failure to obtain air pollution construction or modification permit. - GPO was cited for installing the ZMR press without a proper permit to construct in place. This violation was resolved with the issuance of a new Title V Operating Permit on October 29, 2019.
- 2) Failure to obtain an air pollution operating permit. – Although GPO submitted an application to DOEE for a renewal of GPO's 2000 Title V permit, DOEE failed to issue a permit. Additionally, GPO operated the ZMR press without an operating permit. This violation was resolved with the issuance of a new Title V Operating Permit on October 29, 2019.

In 2016, the EPA inspection noted seven (7) violations that resulted in proposed civil penalties of \$186,634. The penalty was reduced to \$140,000 in a Consent Agreement dated July 25, 2019:

- 1) Failure to Minimize Emissions – EPA found “[t]here were clouds of dust particles in the air above the two cyclones that are supposed to remove the dust from the air from paper baling equipment. In addition, there was dust spread over the tops of the cyclones and ancillary equipment.” Although this violation is still open, GPO has invested millions in improvements. We have replaced the dust collection systems in Plant Operations (Plant) and Security and Intelligent Documents (SID). The new dust collection systems have reduced the amount of dust entering the cyclones significantly and, therefore, reduced the amount of dust that leaks from the cyclones.
- 2) Maintenance Paint Shops & Coatings: EPA found “Facility was not maintaining records adequate to verify compliance with the hourly photochemically reactive solvent emission limits.” The Environmental Manager successfully worked with DOEE to establish an architectural waiver of this requirement if low-VOC paints were used. As a result, GPO discontinued the purchase and use of high-VOC paints. Non-architectural painting is now adequately recorded as required by our Title V permit.
- 3) Open Containers: EPA found “Open containers of blanket wash and fountain solution were noted in Building C.” Similar occurrences are rarer and are discovered earlier, through more frequent inspections. In addition to the Environmental Programs Office, Plant, SID, and Facilities now conduct regular documented environmental inspections for items like open containers.

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- 4) Refrigerants: EPA found “GPO failed to create or maintain servicing records documenting the date and type of service, as well as the quantity of refrigerant added with respect to its appliances containing greater than fifty pounds of a Class I or Class II ozone-depleting refrigerants for the months of October and December 2014 and July 2015.”
  - a. Immediate actions were taken to address this violation by the Power Branch.
  - b. The Environmental Manager tasked the Environmental Consultant contractor with performing an independent audit of Refrigerants Management in 2021. That audit revealed seven (7) areas for improvement, all of which GPO has since implemented. Refrigerants management and servicing documentation now occur without error.
- 5) Container Labeling: EPA found “[t]wenty-seven 55 Gallon drums of unlabeled hazardous waste. This also included several smaller containers of reported hazardous waste, drums of used aerosol cans and fluorescent light bulbs.”
  - a. Just like open containers, drum labeling issues are much rarer. Waste drums, fluorescent light bulbs, and aerosol cans are now labeled without error and seldom noted as deficient during compliance inspections.
  - b. The Environmental Programs Office developed GPO Directive 670.71, Management of Waste Aerosol Cans, signed on June 7, 2022. By following the procedures in this Directive, GPO can now manage waste aerosol cans as Universal Waste and not under the more restrictive hazardous waste guidelines.
  - c. In 2022, the Environmental Manager tasked the Environmental Consultant contractor with performing an independent audit of GPO Waste Management Practices. That audit revealed eight (8) areas for improvement, all of which GPO has since implemented.
- 6) Open Containers: EPA found “Open cans of used aerosol cans and boxes of used fluorescent light bulbs.”
  - a. Aerosol cans and boxes of used fluorescent light bulbs are closed without error.
  - b. Routine documented inspections of satellite accumulation areas now occur.
- 7) Waste Determination: EPA found “GPO failed to make a hazardous waste determination.” Waste is now categorized and documented without error.

The OIG draft report noted significant additional areas for improvement which GPO will implement to continue improving its environmental program, as stated in the recommendation responses below.

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## Agency Response to Recommendations in the Draft Report

### Recommendation 1

*Develop and implement a hazardous waste training schedule, as well as internal policies and SOPs for supervisors and staff that handle hazardous waste. Train employees in accordance with GPO Directive 670.58D.*

GPO concurs with this recommendation.

The Safety Branch will work with WDET to resume safety and environmental training, including hazardous waste training, by October 31, 2023. Plant and SID Managers and Supervisors of waste-generating activities will ensure that employees working with or handling hazardous waste in their area attend this training for awareness and knowledge of the proper methods for handling chemical waste by the end of the first Quarter of FY2024. This training will be performed in many ways: during new employee orientation, wall signs, safety meetings, periodic communication, and formal training through WDET. The Engineering/Facilities Division will work with the Safety Branch to evaluate the need for clarity and definition of roles and responsibilities regarding training and other processes at the individual shop level. If necessary, further SOPs will be collaboratively developed by December 31, 2023.

The Agency expects to complete the review and implement any necessary managerial and supervisory changes by the end of the second Quarter of FY2024.

### Recommendation 2

*Develop and implement end-of-day cleaning procedures that are in alignment with manufacturer specifications, and verify that end-of-day cleaning is performed on all pollution prevention equipment.*

GPO concurs with this recommendation.

Engineering, Environmental, Plant, and SID will form teams within their particular Departments to identify specific pollution prevention equipment that needs periodic cleaning procedures by June 30, 2023. Each team will create periodic cleaning procedures for the applicable pollution prevention equipment by September 30, 2023, and the teams will then meet to standardize, share best practices, and implement the new procedures by December 31, 2023.

The Agency expects to complete the review and implement any necessary managerial and supervisory changes by the second Quarter of FY2024.

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## Recommendation 3

*Develop and implement written procedures for handling hazardous materials for day-to-day operations that could release hazardous substances.*

GPO concurs with this recommendation.

The Safety Branch will work with WDET to resume monthly in-person safety and environmental training courses by October 31, 2023, to include annual training on day-to-day operations that could release hazardous substances for all employees who handle hazardous materials. Facilities, Plant, and SID will send those employees to this training.

Although there are no regulatory requirements for this recommendation, the agency can develop written procedures in addition to accomplishing improvements to the continuous in-person training events.. Spill Response training events were halted in March 2020 due to social distancing requirements caused by the COVID-19 outbreak and have not resumed. The Environmental Manager is currently in discussions with the original vendor scheduled to provide this training in 2020. The intent is to revise the training if needed and present it to Facilities, Plant, and SID employees before the end of the second Quarter of FY2024.

The Agency expects to complete the review and implement any necessary managerial and supervisory changes by the end of the second Quarter of FY2024.

## Recommendation 4

*At each spill kit located throughout the GPO Central Office Complex, provide GPO's Occupant Emergency Plan (or excerpts) that address the management of hazardous waste, including the procedures for responding to hazardous material leaks and spills.*

GPO concurs with this recommendation.

The Safety Branch and SID purchased large vinyl signs with simple steps for containing and cleaning hazardous material leaks and spills. The Environmental Manager submitted a facility work request to install the signs at each spill kit location in the complex, resulting in work order #FWKD0092346. On August 8, 2022, the Carpentry Shop closed that work order after completing the task. Additionally, the Environmental Manager printed and laminated page 17 of the GPO Spill Prevention Control and Countermeasure (SPCC) Plan that provides more detailed instructions (or excerpts) and placed them in all the Spill Kits on May 11, 2023.

Several statements were made within the body of the OIG's inspection report addressing concerns about spill response instruction references to GPO's Occupant Emergency Plan (OEP) and how GPO employees do not have access to the OEP. Since there are Law Enforcement sensitive items within the OEP that restricts its distribution, all references to the OEP were removed from the recently revised GPO Directive 670.58D, Hazardous Waste Management Plan, on March 8, 2023. The Directive now refers employees to the GPO SPCC Plan, readily available to all employees through the Safety Branch intranet website.

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## Recommendation 5

Record daily VOC emissions for Press Groups 97, 40, and 69. If unable to follow permit guidance, work with the DC DOEE to amend permits to eliminate the daily recording requirement, or for an exception to the policy with regard to the daily VOC recording requirements outlined in the Title V permits.

GPO concurs with this recommendation in part.

It should be noted that several actions have occurred during this nearly two-year inspection to resolve these Title V Permit condition deviations. Specifically:

- 1) Plant and SID decommissioned their Group 97 BecMar Classic General Sheet-fed Silk Screen presses. On May 5, 2022, the Environmental Manager submitted an application to DOEE to remove the presses from the Title V Permit.
- 2) The Group 40 Kompac Kwick Finish Coater was last used on January 4, 2021, and Plant will begin the process of decommissioning this piece of equipment by June 2023.
- 3) Plant and the Environmental Manager worked collaboratively with the Group 69 Inkjet press manufacturer to have each press push daily usage reports to the Environmental Manager via email. Since August 25, 2022, the Environmental Manager has received the daily push emails. These email reports are converted to an Emission Tracker within the Environmental Programs Office to calculate daily emissions per permit requirements.

Upon decommissioning the Group 40 Press, the Agency will fully comply with all applicable Title V Permit conditions, thereby addressing this recommendation.

The Agency expects to complete the review and implement any necessary managerial and supervisory changes by the end of the first Quarter of FY2024.

## Recommendation 6

Incorporate the Environmental Manager into the planning phase on all Capital Investments to ensure potential environmental impacts are addressed.

GPO concurs with this recommendation.

Finance will take the necessary action to include the Safety Staff/Environmental Manager in all Strategic Investment Planning Committee (SIPC) meetings to ensure environmental impact risks are evaluated before the Director approves capital investment projects. GPO will update all pertinent SOPs and implement this action for the FY 2024 capital budget planning process, starting June 2023. SOPs 11-0011 and 11-0012 will be updated by August 31, 2023, to include environmental impact risk as a consideration in evaluating business cases.

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## Recommendation 7

Identify and track hazardous waste non-compliance trends.

GPO concurs with this recommendation.

The Safety Branch uses an internal Microsoft Access database to document, track to closure, and trend non-compliance violations. Starting with the 4th Quarter of FY23, the Environmental Manager will evaluate noted hazardous waste discrepancies to identify if any trends are occurring and provide trend analysis data to the GPO Executive Team through the Quarterly Environmental Programs Health Reports.

The Agency expects to complete the review and implement any necessary managerial and supervisory changes by the second Quarter of FY2024.

## Conclusion

Thank you for the opportunity to provide the Agency's input on the draft inspection report from your office. The Agency spent approximately 411 hours assisting with the OIG's Environmental Program Inspection 21-02-II and preparing this response. If you have any questions, please contact me.



HUGH NATHANIAL HALPERN

cc: **Deputy Director**  
**Chief of Staff**  
**General Counsel**





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