

NATIONAL ENERGY TECHNOLOGY LABORATORY

Albany, OR • Morgantown, WV • Pittsburgh, PA



OPERATING PLAN 573.1-2

Title:	U.S. POSTAL MAIL, SHIPPING AND RECEIVING SECURITY		
Owner:	Cindy Mullens, ESS&H Division, Office of Institutional Operations		
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There are no attac	chments to this operating plan.		

FORMS

NETL Form 460.1-13, <u>UPS Express Account and Approval Authorization</u> NETL Form 573.1-3, <u>Parcel Contents Identity for U.S. Postal Service</u>

1. **<u>PURPOSE</u>**

a. The purpose of this operating plan is to establish NETL's compliance with codes of federal regulations that require policies and measures which accomplish effective, economical, and secure management of incoming, internal, and outgoing mail in federal agencies.

2. <u>APPLICABILITY</u>

a. This operating plan applies to all NETL sites and employees.

3. <u>PLAN</u>

- a. Mail handling and receipt of shipped articles are considered points of access, and as such, are integral to security programs at NETL.
 - (1) NETL shall appoint a mail manager who is responsible for ensuring compliance with 41 CFR 102-192, Mail Management.
 - (2) The NETL mail management function will be one of ensuring compliance through establishing internal policies, auditing, and collaboration with CORs of contracts through which mail is received and delivered, and parcels are shipped and received.
 - (3) The goal of the program is to control access to NETL, though mail management, through establishing shipping and receiving processes, and through contract oversight by COs and CORs.
 - (4) Employees should note that the mail, as a function of the United States Postal Service (USPS), is a function that is different from the independent contract, established between NETL and the GSA-contracted United Parcel Service (UPS) shipper (items under 150 pounds). USPS regulations apply to the mail, while UPS contract elements apply to the company shipper. The NETL mail manager oversees the contract of the UPS shipper, but the contract is not funded by an overhead account that covers all shipments. Individual projects are responsible for covering the costs of shipments through program funding.
- b. Parcels and paper mail, which are sent or shipped from this site, are part of a national flow of materials which can pose security and safety risks to USPS employees and facilities, the employees and facilities of UPS shippers, as well as the recipients. USPS regulations and contract elements established by UPS shippers constrict the ways which NETL may send materials. NETL employees shall comply with regulations that restrict the ways and kinds of materials which may be sent by USPS or by our UPS contract shippers in order to comply with laws and protect the safety of shippers and recipients, and maintain the security profile of facilities that process these items.

- c. The NETL federal mail manager shall develop and maintain a manual which describes how NETL complies with USPS regulations, and with the contract elements of our GSA-contracted UPS shipper.
- d. This operating plan is issued to inform employees of their responsibilities in maintaining compliance with the several laws that apply to mail and shipping. These include:
 - (1) Use NETL mail processes as prescribed by the mail manager in order to comply with 41 CFR 102-192.65, which requires that NETL "show allocations and expenses for postage and all other mail costs (e.g., payments to service providers, mail center personnel costs, mail center overhead, etc.) separate from all other administrative expenses."
 - (2) 41 CFR 102-192.70 requires a mail security plan. This is accomplished through processes established in the NETL Mail and UPS/Shipping Manual, warehouse shipping and receiving areas; Procedure 151.1-4, Emergency Response to Special Circumstances, an OUO procedure; and Procedure 151.1-10, a similar procedure released for general employees. NETL also references the Interagency Security Committee's (ISC) Federal Facility Security manual for security level determinations. According to 41 CFR 102-192.75, all federal mail programs must identify, prioritize, and coordinate the protection of all mail processing facilities in order to prevent, deter, and mitigate the effects of deliberate efforts to destroy, incapacitate, or exploit the mail center or the national mail infrastructure.
 - (3) The transportation of chemicals (including samples) through the UPS or other shipment companies is a regulated activity. Employees must be alert to the varying meanings of the word "hazardous" from one context to the other. Several ways exist of listing a material as hazardous, including through OSHA, RCRA, Emergency Response Planning Guidelines, and other governing or professional bodies which list substances and amounts which are defined as hazardous. USPS also lists hazardous substances in context of mail and parcel shipments. These items, which includes some common household items as well as industrial and research-use chemicals, cannot be shipped by USPS. Check the list carefully when determining how to send a parcel.
 - (4) Before preparing to mail or ship any substance, refer to the NETL Mail and UPS/Shipping Manual to learn whether it can be shipped by USPS or UPS and the NETL processes to follow. The Postal Service's[™] definition of a hazardous material includes many common household and consumer products. They may not be dangerous on your shelf at home, but they can become a hazard when shaken or when the temperature or pressure changes. NETL's GSA-contracted shipper is UPS. This website will tell you more about whether you can ship a substance by UPS: <u>http://www.ups.com/content/us/en/resources/ship/hazardous/ index.html?WT.svl=SubNav</u>.

- (5) The NETL Mail and UPS/Shipping Manual contains information for reimbursements from program funding for large or repetitive mailings or shipments, contract weight limitations, process for charging shipments over 150 pounds, insurance coverage, hazardous, and other mail security requirements. Consult with the NETL mail manager if you have any questions, or need to plan for shipments being done within the context of your program. There is no general overhead account which is funded to cover large shipments of materials. Program planning must incorporate these costs into overall project budget planning.
- (6) Specific security measures adopted to identify and handle suspicious mail is covered in official use only information and in the contracts under which those who process shipments operate.
- e. All incoming U.S. Postal Service mail items, and received parcels from ground transportation carriers, are X-rayed and inspected for mail security purposes for possible suspect items. Purchase orders and disclosure statements are removed from outside of all packages and parcels for identification of contents; all incoming packages and parcels are opened by the warehouse personnel under mail security procedures. Opening is required for government property to be tagged as a part of this process. Use of the USPS or UPS for personal mailings or shipments incoming or outgoing is prohibited.

RESPONSIBILITIES

- a. <u>Federal Mail Center Manager</u>
 - (1) Implement policies and procedures developed by the agency mail manager, including cost control procedures.
 - (2) Improve, streamline, and reduce the cost of mail practices and procedures by continually reviewing work processes throughout the facility and seeking opportunities for cost-effective change.
 - (3) Work closely with all facility personnel, especially printing specialists and the program level users who develop large mailings, to minimize postage and associated printing expenses through improved mail piece design, electronic transmission of data in lieu of mail, reducing the number of handwritten addresses on outgoing mail, and other appropriate measures to ensure that all USPS postal addressing format requirements are met before processed at NETL.
 - (4) Ensure that all addresses on mailing lists have been validated using USPS-approved tools such as ancillary endorsements, CASS-certified software, Move Update, and NCOAlink[®] (more information can be found on the United States Postal Service website at <u>www.usps.com</u>).

4.

- (5) Keep current on new technologies that could be applied to reduce agency mailing costs.
- (6) Collaborate and maintain professional relationships with the USPS and all other service providers.
- (7) Establish performance measures and goals for mail center operations, such as a maximum time for processing and delivery of incoming mail.
- (8) Ensure that expedited mail and couriers are used only when authorized by the Private Express Statutes (39 U.S.C. 601–606) and when necessary and cost-effective.
- (9) Manage all incoming and outgoing mail processing activities at the facility, including all regularly scheduled, small package, and expedited service providers, couriers, equipment and personnel.
- (10) Be attentive to unauthorized use, loss, or theft of postage or misuse of government envelopes, including any unauthorized use of penalty or commercial mail stamps, meter impressions or other postage indicia, and immediately report such incidents to the agency inspector general, internal security office, the Postal Inspection Service, or other appropriate authority.
- (11) Track incoming packages and express, certified, or registered accountable mail.
- (12) Provide training to mail center employees at all levels on cost-effective mailing practices for incoming, outgoing, and internal mail, as well as mail security.
- (13) Provide opportunities for training leading to professional certification for mail center personnel.
- (14) Ensure that outgoing mail meets all the standards established by your service provider(s) for weight, size, hazardous materials content identity, etc.
- (15) Ensure that your facility has a written security plan, and implement that plan.
- (16) Establish, publish, and maintain consistency in the facility's mail delivery and pickup times, based on need for service as established through study of mail volumes and service requirements.
- (17) Collaborate with agency finance officials to establish procedures for timely processing of funds owed to service providers.
- (18) Report all mail, UPS, and other shipping expenditures information necessary for your agency's annual mail management report.

b. <u>ESS&H Division Director</u>

(1) Appoint the mail manager.

c. <u>Employees</u>

- (1) Comply with mail and shipment rules established by USPS and UPS.
- (2) Comply with NETL established protocols for preparing shipments and mail (addressing, packaging, content identity, and sender identity) as defined in the NETL Mail and UPS/Shipping Manual.
- (3) Be responsible for supplying funding for UPS shipments, and planning any shipment costs that their projects will incur.
- (4) Be responsible for determining the nature of their own shipments, and providing full content identity and MSDS if available, as the subject matter experts for the material being shipped.
- (5) Be responsible for the accurate completion of the forms listed in the Forms section.
- (6) Inform shippers of the requirement to deliver chemicals to specific locations on the NETL sites, and to attach a purchase order number and disclosure statement, if the contents are hazardous, to the exterior of shipping parcels/boxes for all NETL procured items. This is done automatically through STRIPES, but contractors who do not use STRIPES will be responsible within their own protocols to ensure that hazardous materials and chemicals are identified.

REQUIREMENTS

a. 41 CFR 102-192, Mail Management.

REFERENCES

- a. General Services Administration, Mail Communications Policy Office, Mail Center Security Guide, Third Edition 2004.
- b. ISC Federal Facilities Security manuals (OUO).
- c. NETL Procedure 151.1-4, Emergency Response to Special Circumstances (OUO).
- d. NETL Procedure 151.1-10, <u>Emergency Response to Special Circumstances for General</u> <u>Employees</u>.

5.

6.

e. NETL Mail and UPS/Shipping Manual.

7. **DEFINITIONS**

a. The definitions listed in 41 CFR 102-192.35 are incorporated by reference.

8. **<u>REVISION HISTORY</u>**

VERSION	DATE	SUMMARY OF CHANGES
Original	9/20/12	The purpose of this operating plan is to establish NETL's compliance with codes of federal regulations that require policies and measures which accomplish effective, economical, and secure management of incoming, internal, and outgoing mail in federal agencies.