



Merit System  
Accountability and  
Compliance

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

**U.S. Office of Personnel Management  
Classification Appeal Decision  
Under section 5112 of title 5, United States Code**

**Appellant:** [REDACTED]

**Agency Classification:** Industrial Hygienist  
GS-690-12

**Organization:** Safety Office  
[REDACTED] Veterans Affairs  
Health Care System  
Veterans Health Administration  
U.S. Department of Veterans Affairs  
[REDACTED]

**OPM decision:** Industrial Hygienist  
GS-690-11

**OPM decision number:** C-0690-11-03

A handwritten signature in cursive script, reading "Robert D. Hendler", is written over a horizontal line.

Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Agency Compliance and Evaluation  
Merit System Accountability and Compliance

October 6, 2015  
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards (Introduction)*, appendix 4, section G (address provided in appendix 4, section H).

Since this decision lowers the grade of the appealed position, it is to be effective no later than the beginning of the sixth pay period after the date of this decision, as permitted by 5 CFR 511.702. The applicable provisions of 5 CFR parts 351, 432, 536, and 752 must be followed in implementing the decision. If the appellant is entitled to grade retention, the two-year retention period begins on the date this decision is implemented. The servicing human resources office must submit a compliance report containing the revised position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the effective date of the personnel action.

**Introduction**

On March 3, 2015, the U.S. Office of Personnel Management's (OPM) Chicago Agency Compliance and Evaluation accepted a classification appeal from [REDACTED]s. The appellant's position is currently classified as Industrial Hygienist, GS-690-12. He believes it should be classified at either the GS-12 or GS-13 grade level. The position is assigned to the Safety Office, [REDACTED] Veterans Affairs Health Care System (HCS), Veterans Health Administration (VHA), U.S. Department of Veterans Affairs (VA), in [REDACTED]. We received the complete agency's administrative report on April 27, 2015. Due to program workload considerations, the appeal was transferred to Dallas Agency Compliance and Evaluation for adjudication. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

**Background and general issues**

The appellant requested a review of the classification of his position from his servicing human resources (HR) office. At the time, his GS-690-12 position was assigned to position description (PD), number 004272. The HR office's December 22, 2014, evaluation determined his position was instead properly classified at the GS-11 grade level and assigned to PD number 50244. In a January 22, 2015, memorandum, the VA's Office of Human Resources Management stated they had reviewed and concurred with the HR office's evaluation of the appellant's position. However, no action was taken to effect the downgrade action due to HR Management Letter 15-12-07, issued on June 29, 2012, temporarily suspending classification-related change to lower grade actions across VA. The appellant subsequently filed a classification appeal with OPM. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper classification of the appellant's position. Because our decision sets aside all previous agency decisions, the HR office's December 2014 findings are not germane to this decision.

The appellant states he performs work similar to industrial hygienist positions assigned to other VA HCSs but classified at the GS-12 or higher grade levels. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards (PCS) and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to the PCSs and guidelines is the exclusive method for classifying positions, we cannot compare the appellant's current duties to other positions, which may or may not be classified properly, as the basis for deciding this appeal.

Like OPM, VA must classify positions based on comparison to OPM's PCSs and guidelines. Under 5 CFR 511.612, agencies are required to review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. Consequently, VA has primary responsibility for ensuring its positions are classified consistently with OPM appeal decisions. The copy of a position description submitted by the appellant and a previous appeal decision we issued on a similar position show positions at other VA medical centers may be classified inconsistently with the appellant's position. Therefore, we have asked the agency to give our office an intra-agency classification consistency report. In making its report, the agency will review positions that are identical, similar, or related to the appellant's position to ensure that they are classified consistently with this appeal decision. The

*Introduction*, appendix 4, section I, provides more information about such reports. We have asked the agency to inform the appellant of the results of its consistency review.

The appellant mentions his various degrees, experience, and other personal qualifications in his appeal request to OPM. In addition to having earned a Doctor of Philosophy degree in Industrial Hygiene, he is a Certified Industrial Hygienist, a member of the American Industrial Hygiene Association (AIHA) and other professional organizations, and was recognized as an AIHA Fellow (one of 200 in the AIHA with 8,000 members). Qualifications are considered in classifying positions only to the extent these are qualifications required to perform the current duties and responsibilities assigned to and performed by an employee. Therefore, we could not consider the appellant's personal qualifications except insofar as they were required to perform his current duties and responsibilities.

### **Position information**

The appellant serves as the Green Environmental Management Systems (GEMS) Coordinator for the HCS. The HCS includes the main hospital and ten community-based outpatient clinics, and provides services to more than 184,000 veterans residing in the 50 counties of [REDACTED]. The HCS employs an estimated 1,700 employees who provide the full range of patient care services with state of the art technology and research programs. Comprehensive health care is provided through primary, acute, tertiary, and long-term care in areas of medicine, surgery, neurology, radiation, oncology, and audiology. The appellant is directly supervised by the Safety Manager, who occupies a GS-803-13 Supervisory Safety Engineer position.

As the GEMS Coordinator and primary environmental expert at the HCS, the appellant is responsible for developing, implementing, and interpreting environmental policies and programs in accordance with agency policies and guidelines. He reviews criteria, standards, and instructions developed by the VA and regulatory bodies, adapting and supplementing criteria for local instructions and processes. The appellant carries out environmental and other industrial hygiene related programs and activities in areas including, but not limited to, hazardous and pharmaceutical waste disposal, respiratory protection and ventilation, decontamination, confined space entry, and personal protective equipment (PPE). His duties consist of environmental monitoring, compliance, recordkeeping, and surveillance. For example, the appellant ensures toxic materials are properly stored and secured according to prescribed measures and regulations. He provides industrial hygiene, occupational health, and safety services to employees and management of supported activities, responding to requests and complaints from employees and visitors of the HCS and advising management on how relevant policies, procedures, and systems will affect facility operations. He also instructs employees and management on chemical, biological, and physical safety requirements in order to eliminate and/or reduce workplace accidents and injuries.

The appellant also conducts workplace inspections, audits, and surveys to ensure environmental compliance and to identify, evaluate, and control conditions or hazards with the potential of causing illness or injury to employees performing HCS operations. By conducting routine inspections, he identifies potential health hazards, detects the presence of improperly stored toxic materials, conducts reviews of work processes, and makes overall determinations regarding



compliance with environmental, occupational health, and safety standards. Likewise, he performs investigations as a result of complaints and inquiries from staff, illnesses or discomforts caused by exposure of workers to certain environmental conditions, discovery of unidentifiable and thus potentially toxic materials, and other situations typical of the hospital environment. His investigations may require recommending changes to existing work practices, administrative controls, and/or engineering controls. As Contracting Officer Representative (COR) for the HCS's waste disposal contracts, the appellant develops contract specifications and assures contractors meet performance requirements of the contract in terms of quality, quantity, and timeliness.

As mentioned previously, the appellant's position is currently assigned to GS-12 PD, number 004272. Although the agency determined his position is properly classified at the GS-11 grade level and assigned to PD number 50244, no action was taken to effect the downgrade or assign the position to the associated PD as a result of HR Management Letter 15-12-07 which temporarily postpones VA-wide change to lower grade classification actions. However, the appellant and immediate supervisor certified to the accuracy of the duties described by PD number 50244. This PD and other material of record furnish much more information about the appellant's duties and responsibilities and how they are performed and we incorporate it by reference into this decision. Position classification appeal regulations permit OPM to investigate or audit a position and decide an appeal on the basis of the duties and responsibilities assigned by management and performed by the employee. Because an OPM appeal decision classifies a real operating position and not simply the work depicted in a PD, this decision is based on the actual work assigned to and performed by the employee.

To help decide this appeal, we conducted telephone audits with the appellant on July 13, July 24, August 26, and August 28, 2015; a telephone interview with the immediate supervisor on July 30, 2015; and a telephone interview with the GEMS Consultant for the Veterans Integrated Service Network on September 3, 2015. In reaching our classification decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellant and his agency.

#### **Series, title, and standard determination**

The agency assigned the appellant's position to the GS-690 Industrial Hygiene Series, titled it Industrial Hygienist, and applied the grading criteria in the PCS for Industrial Hygiene Series, GS-690. The appellant does not disagree and, after careful review of the record, we concur.

#### **Grade determination**

The GS-690 PCS is written in the Factor Evaluation System (FES) format, under which factor levels and accompanying point values are assigned for each of the nine factors. The total is converted to a grade level by use of the grade conversion table provided in the PCS. Under the FES, each factor-level description demonstrates the minimum characteristics needed to receive credit for the described level. If a position fails to meet the criteria in a factor-level description in any significant aspect, it must be credited at a lower level unless an equally important aspect that meets a higher level balances the deficiency. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level.

The appellant's initial request to OPM cited disagreement with the agency's evaluation of Factors 1, 2, 3, 8, and 9, but he subsequently questioned their evaluation of Factors 4 and 5 as well during telephone audits with OPM. We reviewed the agency's crediting of Levels 6-3 and 7-3, concur, and have credited the position accordingly. Therefore, our evaluation will focus on the factors contested by the appellant.

*Factor 1, Knowledge Required by the Position*

This factor measures the nature and extent of information or facts the employee must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, regulations, and principles) and the nature and extent of the skills needed to apply the knowledge.

At Level 1-7, work requires professional knowledge and skills applicable to the performance of industrial hygiene duties related to a wide range of industrial settings; or, an intensive knowledge of a specialty area of industrial hygiene (chemical aspects, etc.). Examples of assignments representing this level of knowledge are: skill in identifying, evaluating, and controlling a wide variety of occupational health hazards associated with the entire range of industrial work operations; skill in modifying approaches or applications within a specialty area to such difficult problems as sampling method development, high temperature exhaust ventilation control, and establishing PPE requirements; or a knowledge of the full range of sampling techniques and control measures, as well as a knowledge of administrative and managerial principles and procedures, to plan, implement, and evaluate an industrial hygiene program covering occupational health hazards found in all but the most complex industrial environments.

An illustration at Level 1-7 describes work applying knowledge and skills necessary to conduct a full range of industrial hygiene sampling techniques and control measures, and a knowledge of administrative practices necessary to manage an industrial hygiene program covering light to moderately complex industrial operations, such as industrial shops, laboratories using some hazardous materials, supply depots, warehouses where hazardous material is stored or transported, building construction and similar environments. Work at this level entails directing or performing such functions as planning and initiating surveys or work operations, processes and materials to detect potentially hazardous conditions; and determining the location and number of sampling points, equipment requirements, and applying methods and techniques of data analysis.

At Level 1-8, work includes mastery of the professional concepts, principles, and practices of industrial hygiene that would enable the industrial hygienist to apply experienced judgment and a knowledge of new developments to solve novel or obscure problems; an ability to extend and modify existing techniques; and skill in developing new approaches which may be used by other industrial hygienists in solving a variety of occupational health problems. Typically, the employee is recognized by the agency as being an expert in the broad practice of industrial hygiene or in a major specialization, such as chemical, toxicological, or engineering aspects. Other examples of Level 1-8 work include serving as an agency expert and making decisions or recommendations that significantly affect the context, interpretation, or development of agency policies or programs concerning critical industrial hygiene matters.

An illustration at Level 1-8 describes work applying knowledge and skills sufficient to serve as a recognized expert for the agency in industrial hygiene, having responsibility for developing policy and program objectives, appraising programs, and providing consultative services to management and technical personnel on a wide variety of occupational health problems. Another illustration at Level 1-8 describes work applying expert knowledge of industrial hygiene and of administrative practices necessary to manage a comprehensive industrial hygiene program for a major facility or region when the industrial hygiene program covers large, complex industrial operations; or experimental work involving a wide variety of new chemical agents; or hazardous chemical, bacteriological, or radiological agents in undeveloped or critical stages; or equivalent situations.

The appellant's position meets Level 1-7. His position requires knowledge and skill to develop, manage, and oversee the HCS's GEMS program involving technical complexities and work operations equal to Level 1-7, i.e., involving health hazards typical of a hospital environment and light to moderately complex industrial operations. Similar to Level 1-7, he is skilled at evaluating and controlling a wide variety of occupational health hazards associated with the entire range of work operations performed at the HCS. His environmental monitoring, compliance, recordkeeping, surveillance, and other work requires intensive knowledge of advanced concepts, principles, and practices of hazardous waste disposal, air quality, environmentally safe construction methods, PPE, confined space entry, spill cleanup procedures, etc.

Also at Level 1-7, the appellant's position requires professional knowledge of industrial hygiene concepts, principles, and practices to conduct industrial hygiene inspections, and to provide staff with advice on a broad range of matters particularly related to GEMS program policies, issues, and problems. He conducts surveys and inspections of worksites to determine compliance with VA, Environmental Protection Agency (EPA), and various environmental, occupational health, and safety standards and regulations. This work requires knowledge of work operations and processes; materials and equipment used; construction, operation, and maintenance of healthcare facilities; and byproducts generated by HCS organizations. His position also requires knowledge of systems related to controlling pollution, increasing sustainable practices (e.g., recycling, product substitution, and energy efficiency), and protecting the environment. Similar to Level 1-7, the appellant's position requires skill in using sampling instrumentation and knowledge of a wide variety of health hazards, toxic chemicals, etc., to perform his work. He interacts with HCS staff to ensure hazardous and toxic chemicals utilized or generated at the hospital, clinics, and research facilities are stored, secured, and disposed of properly according to prescribed standards and regulations. This work requires knowledge of researching technical literature and publications to apply technical information to various environmental and other healthcare issues.

The appellant seeks to credit his position at Level 1-8, stating in his appeal request to OPM that he "has been asked to help develop national policies and programs through participation on multiple VHA technical and professional advisory groups." For example, he participates on the Compliance and Process Track Professional Advisory Group for VHA's Center for Engineering and Occupational Safety and Health (CEOSH). The Group is responsible for formulating recommendations to enhance the software system used to record environmental compliance information for VHA facilities. As a participant on the Environmental Survey Technical Advisory Group for VHA's Healthcare Analysis and Information Group, the appellant



participated in the development of a national survey to analyze the effectiveness of the VHA's environmental programs. He also served as a participant, Vice Chair, and Chair on VHA's GEMS Advisory Group which serves as a communication mechanism between GEMS staff at medical centers and HCSs, CEOSH, and other agency organizations to discuss issues of concern, best practices, and opportunities for improvement.

We understand the appellant is highly regarded as suggested by his active participation on various agency-level committees, his instigating recommendations and program initiatives that were subsequently adopted, and his providing occasional advice and guidance to inquiries from counterparts at other medical centers and HCSs as well as industrial hygienists at higher-level VHA organizations. While serving on advisory committees, the appellant recommends procedures and other guidelines for policy development, contributing to advisory products that are designed in committees whose end products are required to be reviewed and approved as a committee prior to agency dissemination. However, this work does not control the grade of his position. The appellant's PD (numbers 004272 and 50244), performance standards, and our interviews confirm the primary purpose of his position is to serve as GEMS Coordinator at his HCS. His regular and recurring work involves carrying out surveys, inspections, and other industrial hygiene tasks for the HCS which, as a component of the VHA, is not considered an "agency" within the meaning of the PCS. Although he is considered the primary environmental expert at the HCS, he is not an agency expert vested with the authority to make decisions or recommendations significantly affecting the context, interpretation, or development of agency-wide policies or programs concerning critical industrial hygiene matters as expected at Level 1-8. Such responsibilities are vested at higher VHA and VA levels.

The appellant works independently in the course of carrying out his industrial hygiene duties, but the extent of his duties are not at the level which would provide for the opportunity typical of Level 1-8 for the innovation and implementation of new approaches impacting on the direction of the industrial hygiene and safety programs throughout the agency. Instead, he provides advice on the local planning and programming requirements pertaining to compliance with the State's Department of Natural Resources, EPA, and other policy directives and procedures relating to GEMS, pollution prevention, sustainable practices, recycling, energy efficiency, procurement, and environmental compliance. He initiates surveys of work operations to detect and control workers' exposure levels to known hazardous substances generated by various work processes of the main hospital and its clinics. The HCS is over half a million square feet, offers all medical specialties, and involves radiology, medical research laboratories, and facility maintenance. Although he deals with a wide range of chemical and other hazards as a result, there is no evidence they are particularly "novel" within the meaning intended at Level 1-8 (i.e., they are not unique to the work carried out at other hospitals). In order to assign Level 1-8, it is expected that these types of problems would occur on a regular and recurring basis with a predictable degree of frequency. The appellant's position deals with various issues at the HCS involving, for example, the identification of proper disposal methods for housekeeping and other wastes generated by the organization, the collection and disposal of pharmaceuticals, and the identification and proper disposal methods of unknown substances discovered at HCS worksites. Most situations will involve known materials where methods and standards concerning the handling of the materials are established beforehand. Thus, the appellant is not regularly confronted with novel or obscure problems at his HCS requiring significantly extending and modifying existing techniques, and developing new approaches to be used by other industrial hygienists as expected at Level 1-8.



Factor 1-7 is credited for 1,250 points.

*Factor 2, Supervisory Controls*

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-4, the supervisor sets the overall objectives and resources available. The employee and supervisor, in consultation, develop the deadlines, projects and work to be done; or in some cases, the employee may have continuing responsibility for a particular geographical or subject-matter area. The employee, having developed expertise in industrial hygiene, is responsible for planning and carrying out the assignment, for resolving most conflicts that arise, for coordinating the work with others as necessary, and for interpreting policy on own initiative in terms of established objectives. For most inspections, evaluations, and special studies, the employee determines the approach to be taken and the methodology to be used. The employee keeps the supervisor informed of progress, potentially controversial matters, or far-reaching implications. Completed work is reviewed only from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements of expected results.

At Level 2-5, the supervisor provides administrative direction with assignments in terms of broadly defined missions or functions. The employee has responsibility for planning, designing, and carrying out programs, projects, studies, or other work independently. Results of the work are considered to be technically authoritative and are normally accepted without significant change. If the work should be reviewed, the review concerns such matters as fulfillment of program objectives, effect of advice, and influence of the overall program, or contribution to the advancement of technology. Recommendations for new projects or alteration of objectives are usually evaluated for such considerations as availability of funds and other resources, broad program goals, or national priorities.

The supervisory controls over the appellant's position meet Level 2-4. He is responsible for developing and implementing comprehensive industrial hygiene programs to maintain a safe environment for employees, patients, and visitors of the HCS. Similar to Level 2-4, the supervisor sets the overall objectives applicable to assigned programs and defines the financial and other management resources available to achieve expected results. The appellant's work assignments are often identified in consultation and collaboration with his supervisor; however, the appellant decides the priorities and importance of each assignment as well as how the assignments are implemented and carried out. Assignments include conducting and coordinating inspections and audits, ensuring on-going disposal of hazardous materials, and instructing HCS employees and management on chemical, biological, and physical safety requirements. The appellant is responsible for deciding the appropriate methods, techniques, approaches, and proper courses of action. As at Level 2-4, he resolves most procedural and other conflicts and issues but keeps the supervisor informed of progress and potentially controversial matters with far-reaching implications. His completed work, such as technical reports of program accomplishments, is reviewed only from the overall standpoint in terms of compatibility with other agency activities, effectiveness in meeting safety objectives, and staying within allocated budget amounts as expected at Level 2-4.

The appellant seeks to credit his position at Level 2-5, stating in his appeal request to OPM:

The incumbent is considered to be a technical authority for health, safety and environmental issues, and interprets policies and directives that are developed by authorities that are above their immediate supervisor in order to assess their effect on overall program needs. The incumbent also defines program objectives and independently designs, plans and carries out work activities. The incumbent's supervisor reviews completed work for consistency and accepts work as being technically authoritative and not needing significant change.

The supervisory controls over the appellant's position do not meet Level 2-5, which describes significantly greater independence and responsibility than that delegated to his position. His work results are considered to be technically authoritative and are normally accepted without significant change. However, the technical and policy issues he deals with at the HCS are not of the breadth or depth found at Level 2-5 where, for example, recommendations for new projects or alteration of objectives are usually evaluated for such considerations as availability of funds and other resources, broad program goals, or national priorities. The supervisor, as Safety Manager, is the recipient of various safety-related inquiries and complaints from HCS employees. Thus, he expects the appellant and other Safety Office staff to keep him informed of current assignments so that he can distribute work equitably when assigning inquiries, complaints, and other tasks to subordinate staff for resolution. The supervisor also expects staff to keep him informed of any situation that may potentially require the attention of HCS leadership staff, involve funding, and cross or involve multiple safety disciplines (e.g., recommendations to install handrails to an uneven sidewalk). The supervisor also adjusts work priorities of the Safety Office staff, when necessary, to ensure pressing issues such as a veteran's access to care are dealt with promptly. So unlike Level 2-5, the appellant's supervisor does not provide only an administrative direction of assignments in terms of broadly defined missions or functions.

Level 2-4 is credited for 450 points.

### *Factor 3, Guidelines*

This factor covers the nature of guidelines and the judgment employees need to apply them.

At Level 3-3, guidelines include Federal standards and criteria documents, standards published by recognized organizations and professional societies, technical literature, agency policies and regulations, precedents, office files, and standard practices. While these guidelines are available, they are not always completely applicable to the work. The industrial hygienist independently selects, evaluates, and applies the guides, making adaptations when necessary, or recommending changes. In addition, the industrial hygienist must exercise judgment in applying standard practices to new situations and in relating new work situations to precedent ones.

At Level 3-4, guidelines are essentially the same as in Level 3-3. However, the work assignments are such that these guidelines are often inadequate in dealing with the more complex or unusual problems, such as treating hazards for which very little information on toxicity is

available. The industrial hygienist must adapt and apply industrial hygiene principles and practices to situations where precedents are not directly applicable and must use experienced judgment and initiative in selecting approaches, evaluating findings, and researching new developments in the field. In some cases, the employee must engage in an extensive literature search to locate suitable information. Some situations require the employee to devise new approaches or develop new methods for evaluating or controlling a health hazard.

The appellant's guidelines meet Level 3-3. Similar to this level, his guidelines include Federal, State, and local environmental standards and regulations; agency manuals and directives; Executive Orders; Federal occupational health and safety standards; technical journals and publications from various professional associations; and reports on past studies and established practices. In addition to the availability of textbooks, manufacturers' catalogs, and other technical materials, the appellant's guidelines include agency instructions which are typically quite broad and general in nature. Like Level 3-3, he independently selects, evaluates, and applies EPA, Occupational Safety and Health Administration, and other applicable industry guides and reference materials, making adaptations when necessary. To complete day-to-day tasks as the HCS's GEMS Coordinator, the appellant operates within established laws and regulations, policies, and industry standards containing, for example, specific information, guidance, and protocol for storing, securing, monitoring, and disposing of hazardous and non-hazardous materials. He coordinates with principal organizational representatives and uses initiative to negotiate compliance with environmental policies, standards, and regulations in terms of established objectives. As guidelines are not always applicable to situations occurring at the HCS, the appellant's handling of hazardous and pharmaceutical waste disposal, PPE, respiratory protection, and other issues involves the application of standard practices to new situations as expected at Level 3-3.

The appellant seeks to credit his position at Level 3-4, stating in his appeal request to OPM that his GEMS programs "were developed with very little guidance or input from higher level agency representatives." The guidelines required of his position, however, do not meet Level 3-4 as his HCS-level GEMS program work does not typically require the improvisation or creation of new approaches or techniques with the frequency required to credit Level 3-4. For example, the appellant does not routinely treat hazards for which very little information on toxicity is available as the main hospital, clinics, and laboratories typically use commercially available equipment and chemicals for which the hazards are known and well documented. Unlike Level 3-4, his position does not require exercising initiative and judgment to identify, modify for agency use, and/or incorporate the latest and most pertinent technological concepts and practices. Also in contrast to Level 3-4, the appellant's position does not require exercising judgment and ingenuity to develop nationwide technical guidelines (for use by others inside and/or outside of the agency) which typically include subjects on professional methods for which existing guides are totally lacking or technically inadequate for use in the agency's work.

Level 3-3 is credited for 275 points.



*Factor 4, Complexity*

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

At Level 4-4, assignments cover the full spectrum of occupational health hazards found in all but the most complex industrial environments. Thus, the assigned work activities involve a substantial amount and variety of exposure to chemical, physical, bacteriological, and/or radiological hazards. The employee must recognize hazards which are uncommon, evaluate a variety of data, and institute or recommend effective control measures to protect the workers. Factors to be considered include unusual work processes or operations, exotic chemicals for which toxicological information may be incomplete, and the need to adapt or modify precedent methods in the control of hazardous exposures.

At Level 4-5, work includes a broad range of activities and involves the identification and treatment of novel or obscure problems which require the employee to be versatile and innovative in adapting and modifying precedents, methods, and techniques. Assignments are characterized by many difficult considerations due to breadth, diversity, or intensity of occupational health problems encountered. Examples of factors to be considered include (1) major areas of uncertainty resulting from complicated work processes, such as highly complex research and development work; (2) the need to develop new methodologies for the evaluation and control of a particular health hazard where relevant literature is inadequate or nonexistent; (3) serious conflicts between industrial hygiene and management considerations; (4) health effects from long-term, chronic exposures are unknown or poorly defined; or (5) exposures are complicated by mixtures of toxic and/or physical hazards. Work often includes originating new techniques and developing new information for use by other occupational health personnel.

The complexity of the appellant's position meets Level 4-4. As at this level, his assignments cover the full spectrum of occupational health hazards covering all but the most complex industrial environments. He is responsible for the development and ongoing compliance of the GEMS program at the main hospital and affiliated clinics, which involves providing advice on the wide range of environmental, industrial hygiene, and other safety related problems encountered by staff, patients, and visitors of the HCS. The appellant's duties involve a variety of exposure to chemical, physical, bacteriological, and radiological risks. For example, he monitors and determines the most effective and efficient method for collecting, consolidating, and disposing of wastes and other harmful agents based on EPA, VA, and other hazardous waste rules. As at Level 4-4, the appellant must recognize uncommon hazards, evaluate sampling data, and prescribe appropriate protective gear and other control measures to properly safeguard HCS staff and others. He applies industrial hygiene principles, practices, and judgment to analyze available collection and disposal methods of hazardous and non-hazardous wastes to determine the adequacy of current methods to locally develop additional collection and disposal approaches beyond existing ones. The appellant also conducts testing on the PPE used by HCS police officers and other staff in various controlled environments to determine the efficacy of equipment and instruct staff on appropriate usage. He must consider unusual work processes or operations in carrying out these and other duties, thus requiring he adapt or modify precedent methods to control or eliminate hazardous exposures as described at Level 4-4.

The appellant's position does not meet Level 4-5. Unlike this level, he is not regularly confronted with identifying and treating novel or obscure problems requiring versatility and innovation to adapt and modify precedents, methods, and techniques. His work entails performing internal gap analyses of the HCS's GEMS program in preparation for evaluation by agency compliance and environmental regulation inspectors; ensuring contractors meet performance requirements established by waste disposal contract specifications; and inspecting hazardous waste and other storage areas to ensure items are stored, inventoried, and disposed of upon expiration or when appropriate. He deals with complex problems, identifying and resolving potential issues prior to occurrence or citation by regulatory inspectors. Since his assignments are not characterized by many difficult considerations due to the breadth and diversity of occupational health problems found at the HCS's hospital and clinical environment, the appellant does not deal with major areas of uncertainty equal to the highly complex research and development work environment expected at Level 4-5.

Also unlike Level 4-5, the appellant neither confronts health hazards where relevant technical literature is inadequate or non-existent requiring development of new methodologies for evaluation and control, nor deals with serious conflicts between industrial hygiene and management considerations. He reviews the implementation of GEMS policies and procedures, discussing any deficiencies and recommending preventive and corrective actions to HCS management. Since the goal of maintaining the safety of staff, patients, and visitors to the HCS is shared by him and local management officials, the appellant does not normally deal with serious conflicts with management considerations as described at Level 4-5. Other duties include conducting air emission samplings to detect and measure the presence of harmful conditions, and recommending corrective measures to reduce or eliminate hazards. In contrast to Level 4-5, the health hazards addressed by the appellant do not encompass health effects from long-term, chronic exposures which are unknown or poorly defined, and his exposure to hazardous materials are not regularly complicated by mixtures of toxic and/or physical risks. The record also shows his work does not require originating new techniques and developing new information for use by other industrial hygiene personnel as expected at Level 4-5.

Level 4-4 is credited for 225 points.

#### *Factor 5, Scope and Effect*

This factor covers the relationship between the nature of the work (i.e., the purpose, breadth, and depth of the assignment) and the effect of work products or services both within and outside the organization. Effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or affects the adequacy of research conclusions.

At Level 5-3, the purpose of work is to investigate and analyze a variety of problems or conditions in the workplace which may adversely affect the health of workers, and to provide or recommend ways of eliminating problems. The work affects the design and operation of equipment, work processes, or systems (such as evaluation of the adequacy of occupational health protection devices); the adequacy of inspections or surveys; and the health and well-being of the workers.

At Level 5-4, the purpose of the work is to provide expertise as a specialist in the broad practice of industrial hygiene, or in a specialty area of industrial hygiene, by furnishing advisory, planning, or reviewing services on specific problems, projects, or programs, and operating conditions directly affecting worker health and safety. The work may include the development of criteria, procedures, or instructions for major agency activities, or the investigations, analysis, and evaluation of complex problems and situations. Work products or decisions affect a wide range of the agency's occupational health and safety programs, or major activities of industrial concerns. For example, decisions involve more than the removal of the hazardous situation alone. They affect complex work processes which may adversely affect productivity patterns, financial posture, and competitive industrial relationships, requiring delicate balances in professional judgments and conclusions.

The appellant's position meets Level 5-3. As at this level, the purpose of his position is to manage the GEMS program for the HCS's main hospital and clinics, analyzing and investigating a variety of healthcare operations to determine the presence and severity of environmental and other safety hazards, their impact on the environment, and to recommend means for their control. Similar to Level 5-3, the appellant's recommendations and decisions impact the environmental safety and health of staff, patients, and visitors to the HCS; the quality of surveys and inspections conducted; and the adequacy of methods and techniques applied to control or eliminate hazards.

The appellant's position does not meet Level 5-4 which involves providing regular and recurring expertise as a specialist in the broad practice of industrial hygiene, or in a specialty area of industrial hygiene, by furnishing advisory, planning, or reviewing services on specific programs, projects, or programs, in addition to operating conditions directly affecting worker health and safety. His HCS organization is not assigned responsibility for developing criteria, procedures, or instructions for major VA activities as expected at Level 5-4. As GEMS Coordinator, the appellant provides program-related guidance and oversight at the HCS. As the primary purpose of his position is to manage an activity-level program the effect of which is local in nature, his work products and decisions do not affect a wide range of the agency's occupational health and safety programs or major activities of industrial concerns as described at Level 5-4.

Level 5-3 is credited for 150 points.

#### *Factor 8, Physical Demands*

This factor covers the requirements and physical demands placed on the employee by the work assignment.

At Level 8-2, work includes frequent inspections or surveys of industrial workplaces, requiring the employee to carry a considerable amount of equipment, and involve a good deal of walking, standing, bending, and climbing.

At Level 8-3, work requires frequent and protracted periods of strenuous physical exertion such as long periods of climbing, crouching, or crawling in confined spaces or around and between operating equipment while carrying moderately heavy equipment (20 – 30 pounds or more) and while wearing protective clothing.



The appellant's frequent inspections and surveys of the HCS worksites fully meet Level 8-2. His work requires carrying a considerable amount of equipment and involves a good deal of walking, standing, bending, and climbing as expected at Level 8-2.

The appellant seeks to credit his position at Level 8-3, stating in his appeal request to OPM:

...the incumbent is largely responsible for the oversight and operation of the [HCS] hazardous waste programs. As a result, the incumbent oversees and deals with hazardous wastes generated through a diverse array of activities, which includes clinical (pharmaceuticals, chemotherapy agents, radiological imaging solutions, dental amalgam, etc.), research laboratories (formalin, formaldehyde, etc.), clinical laboratory (GenXpert Cepheid cartridges, listed solvent waste, etc.), and facility maintenance/operations (used oils, used solvents, spill response materials, etc.).

The appellant's work requires opening and inspecting contents of hazardous waste containers to ensure HCS organizations are complying with EPA and other hazardous waste regulations. He also collects, handles, transports, and stores hazardous waste containers; for example, non-hazardous pharmaceutical wastes are stored in a 55-gallon polydrum at the hospital basement which he moves, by cart, a block away to the hazardous waste container storage area at the research laboratory complex. The filled drum weighs approximately 250 pounds. He also inspects a 30-gallon metal drum filled with hazardous waste solvents produced by the clinical laboratory. The appellant's work with hazardous materials and other duties require taking safety precautions such as wearing PPE (e.g., an apron, shoe covers, head cover, gloves, and face shields). He must be in good physical condition to perform physically challenging work such as climbing into trash dumpsters to inspect contents for potential hazards, crawling through confined spaces, and moving pharmaceutical and other wastes as described above. However, the appellant's work does not meet Level 8-3 where duties require regular and prolonged periods of considerable and strenuous physical exertion. His tasks require bursts of strength when lifting heavy objects, working in tight spaces, and climbing into dumpsters, but this and other work do not require sustaining strenuous physical exertion on a regular basis and for a protracted period of time as described at Level 8-3. Such physically demanding tasks do not occur with sufficient frequency to control the evaluation of this factor for purposes of the position classification process.

Level 8-2 is credited for 20 points.

#### *Factor 9, Work Environment*

This factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required.

At Level 9-2, there is regular exposure during inspections or surveys to all of the hazards and discomforts to which the workers are subjected, including a wide range of toxic chemicals, physical stresses, and safety hazards. The employee must use a variety of protective equipment and clothing, such as respirators, ear plugs, gloves, coveralls, hard hats, etc.

At Level 9-3, work involves regular and recurring exposure to potentially dangerous or hazardous situations, such as working with explosives or incendiary materials; working at great heights under temperature extremes; or working around fatal viruses, areas devoid of oxygen, containing harmful bacteria, or emitting hydrogen sulfide. A variety of health and safety precautions are necessary as two or more potentially hazardous conditions may occur simultaneously.

The appellant's position fully meets Level 9-2, as he has regular and recurring exposure from routine inspections, surveys, and investigations to the full range of hazards and discomforts to which HCS employees are also subjected. He deals with a wide range of toxic chemicals, physical stresses, and safety hazards. Also at Level 9-2, he must regularly use a variety of PPE such as protective gloves, aprons, face shields, hard hats, safety shoes, and ear protectors.

The appellant seeks to credit his position at Level 9-3, stating in his appeal request to OPM that he "directly oversees and deals with hazardous wastes generated from a diverse array of processes and activities." For example, he states he regularly wears PPE to consolidate two hazardous waste solutions and triple-rinse containers weekly. However, Level 9-3 is the highest level described by the PCS and thus reserved to positions faced with the highest exposure to dangerous or hazardous situations, often when two or more potentially hazardous situations occur at the same time. The appellant's HCS, as it is controlled to ensure the safety of all employees and visitors to the main hospital and clinics, does not involve the regular and recurring exposure to the extreme dangerous or hazardous situations equal to working with explosives or incendiary materials, working at great heights under temperature extremes, or similar situations where conditions cannot be controlled as expected at Level 9-3.

Level 9-2 is credited for 20 points.

### *Summary*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge Required by the Position	1-7	1250
2. Supervisory Controls	2-4	450
3. Guidelines	3-3	275
4. Complexity	4-4	225
5. Scope and Effect	5-3	150
6. Personal Contacts	6-3	60
7. Purpose of Contacts	7-3	120
8. Physical Demands	8-2	20
9. Work Environment	9-2	<u>20</u>
<i>Total</i>		2570

A total of 2,570 points falls within the GS-11 range (2,355 to 2,750) on the grade conversion table in the PCS.

**Decision**

The appellant's position is properly classified as Industrial Hygienist, GS-690-11.



**Distribution**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

Supervisory Human Resources Specialist  
(Classification)

[REDACTED]

Consolidated Classification Unit

[REDACTED]  
[REDACTED]  
[REDACTED]

Acting Director, Compensation and Classification Service (055)  
Office of Human Resources Management  
U.S. Department of Veterans Affairs  
810 Vermont Avenue, NW, Room 240  
Washington, DC 20420  
stephanie.boyd@va.gov  
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NETWORK 15 HRM19137586496 003/004  
P.21/29

## HRMS OFFICE COPY

POSITION DESCRIPTION (Please Read Instructions on the Back)						1. Agency Position No. 4272	
2. Reason for Submission <input type="checkbox"/> Reestablishment <input checked="" type="checkbox"/> New <input type="checkbox"/> Reestablishment <input type="checkbox"/> Other		3. Service <input type="checkbox"/> Active <input checked="" type="checkbox"/> Field		4. Employing Office Location UAMC		5. Subject to IA Action <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
6. OPM Certification No.		7. Fair Labor Standards Act <input checked="" type="checkbox"/> Exempt <input type="checkbox"/> Nonexempt		8. Financial Statements Required <input type="checkbox"/> Executive Personnel <input type="checkbox"/> Employment and Financial Statement		9. Competitive Level Code X01	
10. Position Status <input checked="" type="checkbox"/> Competitive <input type="checkbox"/> Excepted (Specify in Remarks)		11. Position is: <input type="checkbox"/> 1-Non-Sensitive <input type="checkbox"/> 2-Critical		12. Agency Use			
13. Classified/Controlled by		Official Title of Position		Pay Plan		Occupational Code	
a. Office of Personnel Management							
b. Department, Agency, or Establishment							
c. Second Level Review		Abolished				sdm 12/22/2014	
d. First Level Review		Industrial Hygienist		GS 690		12/22/04	
e. Recommendation by Supervisor or Immediate Chief		Industrial Hygienist		GS 690		12	
16. Organizational Title of Position (if different from official title) Field GENS, DECON, Respirator Prog Mgr				17. Name of Employee (if vacant, specify)			
18. Department, Agency, or Establishment Veterans Health Administration				19. Third Subdivision			
20. First Subdivision VA Medical Center Director				21. Fourth Subdivision			
22. Second Subdivision				23. Fifth Subdivision			
24. Employee Review-This is an accurate description of the major duties and responsibilities of my position.				Signature of Employee (optional)			
25. Supervisory Certification. I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that:				this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.			
a. Typed Name and Title of Immediate Supervisor				b. Typed Name and Title of Higher-Level Supervisor or Manager (optional)			
Signature				Signature			
Date				Date			
26. Classification/Grading Certification. I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.				27. Position Classification Standards Used in Classifying/Grading Position PCS - GS - 690 (6/80)			
Typed Name and Title of Official Taking Action OFFICER				Information for Employees. The standards and information on their application are available in the personnel office. The classification of the position may be reviewed and corrected by the agency or the U.S. Office of Personnel Management. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the U.S. Office of Personnel Management.			
Signature				Date 8/24/04			
28. Position Review				29. Position Review			
Initials Date Initials Date Initials Date Initials Date				Initials Date Initials Date Initials Date Initials Date			
a. Employee (optional)				b. Supervisor			
c. Classifier							

24. Remarks  
In terms of ADP Security, is responsible to safeguard privacy/data sensitive policy matters data against unauthorized disclosure; safeguard user access code(s) from unauthorized disclosure and use; and to notify ADP Security Officer or designated alternate upon disclosure or suspected disclosure of sensitive data.

Position is at full performance level.

25. Description of Major Duties and Responsibilities (See Attached)

FORM 2004-04 034 4955

Previous Edition Invalid

SC08-108

OF 11/04/2004  
U.S. Office of Personnel Management

**Position Description**  
**VAMC Environmental, Respiratory Protection and Decontamination**  
**Program Manager**

**INDUSTRIAL HYGIENIST**  
**GS-0690-12**

The VA Medical Center (VAMC) Green Environmental Management Systems (GEMS) Coordinator is the key member of the VAMC GEMS Committee responsible for coordinating the development and implementation of the VA GEMS across VAMC organizational elements.

**Major Duties and Responsibilities:**

The GEMS Coordinator is responsible for coordinating the efforts of VA Medical Center staff involved with the GEMS to ensure that the GEMS is developed and implemented in accordance with VHA and VA Medical Center policy and guidance. The GEMS Coordinator is further responsible for ensuring that the GEMS results in findings and conclusions that lead to continual improvement of environmental programs at the VA Medical Center. The GEMS Coordinator is responsible for applying environmental science and technology to demonstrate relationships between the operation of the VA Medical Center with human health, ecosystems, environmental media and natural resources. The GEMS Coordinator provides leadership and direction to management, professional and technical personnel regarding the development and implementation of the facility GEMS.

As GEMS Coordinator, the incumbent plans, organizes, implements, oversees and provides technical assistance for projects to resolve environmental problems. Assignments include, but are not limited to, domestic and industrial wastewater treatment and disposal; safe drinking water; treatment, storage and disposal of hazardous and non-hazardous solid waste; release of hazardous material/spill response; air pollution control; environmental media permitting; toxic substances; and regulatory oversight. The GEMS Coordinator provides technical expertise for the design, modification, operation and maintenance of VA Medical Center facilities and infrastructure to ensure compliance with environmental regulations.

The GEMS Coordinator is also responsible for managing VAMC environmental program(s) and coordinating the efforts of VAMC organizations that relate to environmental matters. Additional responsibilities of the GEMS Coordinator related to management of the VAMC environmental program(s) are:

- a. Develop and implement environmental policies, procedures and systems.
- b. Advise management on how environmental policies, procedures and systems will affect the operation of the VA Medical Center.
- c. Evaluate, modify and implement pollution prevention alternatives at the VA Medical Center to reduce the generation of waste.



- d. Manage and/or provide technical advice regarding response to environmental emergencies including releases/spills of hazardous material.
- e. Facilitate the exchange of environmental information to VA Medical Center staff, including the development and implementation of training and educational programs related to environmental programs.
- f. Develop and present to upper level VA Medical Center management budgetary information related to environmental programs.
- g. Manage computer programs and databases to enhance management of environmental programs.
- h. Review how expansion, modifications, closures of existing facilities and infrastructure and new construction of structures and infrastructure will affect the environment, provide information that will minimize adverse impacts to human health and the environment and reduce the VA Medical Center's vulnerability.
- i. Measure the effectiveness of existing environmental programs and recommend additions to environmental program as needed to meet changing environmental requirements.
- j. Develop promotional and educational activities to promote stakeholder awareness of VA Medical Center environmental issues.

Serves as a technical expert and program management expert for the VAMC, with responsibility for providing leadership guidance, technical assistance and evaluation for matters involving industrial hygiene, decontamination, respiratory protection and environmental technology and compliance, including environmental management systems.

- Plans, conducts or directs special studies concerned with occupational health problems which require the development or modification of air sampling equipment or protective devices or the evaluation of control measures for a specific operation, such as decontamination team response to hazmat or WMD incidents. Often serves as team leader during drills.
- On the basis of sampling results, observation of the operation and knowledge of toxic or hazardous materials, prepares a technical report citing health hazards and setting forth recommended actions for their control or elimination.
- Develops healthcare decontamination, respiratory protection and Green Environmental Management Systems (GEMS) programs at VAMCs.
- Performs work related to the management and operation of VHA healthcare facilities and programs that are needed to: protect the environment, protect human health from environmental pollution and improve air, land and water resources. The work requires knowledge of the organization of the facility, as well as the construction, operation and maintenance of healthcare facilities. Also required is the knowledge of all systems related to controlling pollution and protecting the environment.

- Plans and manages industrial hygiene and environmental projects/programs that are related to achieving and maintaining environmental compliance, as well as developing and implementing environmental policy, guidance and procedures related to all environmental media.
- Resolves difficult and complex technical, project management and organizational problems using innovative and original approaches. Provides expert technical advice and guidance to senior management officials in the appropriate application of technology to VHA's mission as it relates to environmental issues including GEMS.
- Serves as an expert on issues related to environmental statutes and Occupational Safety and Health Administration requirements, as well as for new or enhanced information system software related to occupational safety and health and environmental programs.
- Participates in developing courses of instruction for VAMC personnel, preparing course agenda, making arrangements for demonstrations, drills and giving technical instruction on environmental and industrial hygiene subjects.
- Responds to inquiries and provides technical assistance to VAMC personnel.
- Serves as a technical authority for VAMC with responsibility for assuring adequacy of facility Green Environmental Management System (GEMS), respiratory protection program, and decontamination program.

This involves advising on the overall planning and programming requirements for the operations and maintenance of such programs at VAMC. Advice rendered:

- a) Pertains to the interpretation and implementation of (and compliance with) environmental management policy directives and applicable procedures and involves subjects directly related to GEMS, pollution and environmental compliance;
- b) Involves subjects related to the management of respirator programs for occupational health especially in the healthcare setting including selection of appropriate protective devices, user training and evaluation of new devices.
- c) Involves subjects related to decontamination of patients and staff resulting from hazardous materials, WMD or other emergency incidents including risk assessment, emergency management response, personal protective equipment selection, and training.
- Conducts internal annual gap analyses of GEMS at VAMC in preparation for evaluation by VISN. Reviews implementation of GEMS policy and procedures and reports the status to VISN/VHA CO. Discusses deficiencies and necessary remedial action with appropriate VAMC top management and GEMS Committee. Approves preventive and corrective action.

- Interprets new or revised technical or management guidance material provided by VHA organizations, regulatory and advisory agencies. Reviews and comments on technical reports or studies that relate to or impact on the operation and maintenance of the VAMC.
- Develops facility decontamination programs in compliance with agency policy, regulatory standards and current best practices. Leads facility training and exercises.
- Develops, evaluates and provides corrective actions for respirator programs at VAMC. Recommends and approves remedial actions.
- Coordinates an effective healthcare decontamination team in compliance with VA, VHA, OSHA, EPA and JCAHO.
- Cooperatively works with federal, state and local environmental and occupational safety and health organizations in areas of mutual interest.
- Keeps abreast of latest development in the field of environmental management systems, respiratory protection and healthcare decontamination by review of technical publications, attending technical conferences or professional society meetings, and discussion with industry representatives.
- Participates in training sessions for VAMC personnel.

#### *Factor 1 – Knowledge Required By the Position*

Successful completion of an undergraduate or higher degree in industrial hygiene, environmental engineering or a related engineering discipline from an accredited college or university.

Professional knowledge of industrial hygiene concepts, principles and practices that enables the employee to conduct industrial hygiene studies, to develop sampling or control methods and to provide expert advice to VAMC staff in a broad range of industrial hygiene matters.

Knowledge required in evaluating and applying methods and equipment to the practice of industrial hygiene, particularly in dealing with problems not readily treatable by standard methods.

Knowledge required to research technical publications and apply technical knowledge to healthcare environmental and occupational health issues.

Mastery of advanced concepts, principles and practices of environmental engineering and compliance, respiratory protection and healthcare decontamination.

Knowledge and skill to develop VAMC GEMS, healthcare decontamination and respiratory protection programs.

### *Factor 2 – Supervisory Controls*

Schedules own work in coordination with other VAMC staff and supervisor. Supervision is administrative rather than technical. Completed work is considered technically accurate.

### *Factor 3 – Guidelines*

Primary guidelines are published Federal occupational health and safety standards, federal, state and local environmental regulations, Presidential executive orders, agency manuals and directives, technical journals and other publications of various professional associations, textbooks, reports on past studies and established practice. These guidelines are frequently inadequate for dealing with complex problems, such as hazards for which standards do not exist or for which established practices are not applicable, such as decontamination or respirators for WMD. The employee may be required to apply new sampling techniques or personal protective equipment in controlling a particular hazard.

### *Factor 4 – Complexity*

Assignments involve a full range of environmental, respiratory protection and decontamination programs at a VA medical center.

The employee must identify, evaluate and recommend control measures for any type of health hazard to which workers are exposed. At times, this involves dealing with new materials or processes that require the employee to modify techniques of evaluation and control. In addition, the employee is called on to research technical publications.

Surveys involve evaluation of the VAMC's GEMS, including the compliance assurance program elements, and progress on preventive and corrective action plans.

### *Factor 5 – Scope and Effect*

The purpose of the work is the investigation and analysis of a variety of VAMC industrial and healthcare operations to determine the presence and magnitude of occupational health hazards and to recommend means for their control. The incumbent, as a field expert, is called on to provide instruction and expert advice to VAMC personnel. The work affects a wide range of VAMC industrial and healthcare activities.

Mastery of advanced concepts, principles and practices of environmental management and compliance, respiratory protection and healthcare decontamination.



Knowledge and skills to develop, guide and inspect VAMC GEMS, healthcare decontamination and respiratory protection programs.

*Factor 6 – Personal Contacts*

Contacts on surveys include the facility Director, safety personnel, industrial hygienists, employees and their supervisors. Other contacts include contractor personnel, industrial hygienists and safety personnel within the agency and within other Federal agencies, as well as agency engineers, chemists, and physicians. Other contacts include regulatory agency personnel (OSHA, EPA, JCAHO, State) and VISN staff.

*Factor 7 – Purpose of Contacts*

Contacts are to provide expertise on a wide range of industrial hygiene, healthcare decontamination and environmental problems to gain compliance with and support for effective industrial hygiene and environmental protection practices. Contacts with contractors and agency management require skill and tact to overcome technical disagreements or to convince them of the necessity of certain control measures, particularly since control measures frequently result in higher costs, such as new equipment or processes, and in delays to production schedules or mission accomplishment.

*Factor 8 – Physical Demands*

The work requires the employee to carry a good deal of equipment and involves walking, standing, bending, climbing or crawling during surveys.

*Factor 9 – Work Environment*

During surveys, the employee is subjected to all the risks and discomforts associated with industrial activities of the agency. This exposure requires the use of protective clothing and equipment, including respirators, hardhats and ear protectors. May encounter exposure to hazardous materials including biological, chemical and radioactive agents.

# POSITION DESCRIPTION (Please Read Instructions on the Back)

1. Agency Position No.  
50244-0

2. Reason for Submission  
☒ Redescription ☐ New  
☐ Reestablishment ☐ Other

Explanation (Show any positions replaced)

Redescription of PD #4272

3. Service  
☐ Hdqtrs ☒ Field

4. Employing Office Location

5. Duty Station

7. Fair Labor Standards Act  
☐ Exempt ☒ Nonexempt

8. Financial Statements Required  
☐ Executive Personnel Financial Disclosure ☐ Employment and Financial Interest

9. Subject to IA Action  
☐ Yes ☒ No

10. Position Status  
☒ Competitive  
☐ Excepted (Specify in Remarks)  
☐ SES (Gen.) SES (CR)

11. Position is  
☐ Supervisory ☒ Managerial ☒ Neither  
12. Sensitivity  
☒ 1-Non-Sensitive ☐ 3-Critical  
☐ 2-Noncritical Sensitive ☐ 4-Special Sensitive

13. Competitive Level Code  
X01

14. Agency Use

15. Classified/Graded by	Official Title of Position	Pay Plan	Occupational Code	Grade	Initials	Date
a. Office of Personnel Management						
b. Department, Agency or Establishment						
c. Second Level Review						
d. Final Level Review	Industrial Hygienist	GS	0690	11	sdm	12/22/2014
e. Recommended by Supervisor or Initiating Office	INDUSTRIAL HYGIENIST - GEMS COORDINATOR	GS	0690	12	BMM	12/17/2014

16. Organizational Title of Position (if different from official title)  
GEMS Coordinator

17. Name of Employee (if vacant, specify)

18. Department, Agency, or Establishment  
DEPARTMENT OF VETERANS AFFAIRS

c. Third Subdivision  
ASSOCIATE DIRECTOR

a. First Subdivision  
VETERANS HEALTH ADMINISTRATION

d. Fourth Subdivision  
SAFETY- Director's Office

b. Second Subdivision  
HEALTH CARE NETWORK

e. Fifth Subdivision  
Safety

19. Employee Review-This is an accurate description of the major duties and responsibilities of my position.

Signature of Employee (optional)

20. Supervisory Certification. I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that

this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

Typed Name and Title of Immediate Supervisor

b. Typed Name and Title of Higher-Level Supervisor or Manager (optional)

12/17/2014

21. Classification/Job Grading Certification. I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.

22. Position Classification Standards Used in Classifying/Grading Position  
Industrial Hygiene Series, GS-0690 TS-46 October 1980;  
OPM decision number: C-0690-11-01

Typed Name and Title of Official Taking Action

Supervisory HR Specialist (Class),

Signature

Information for Employees: The standards and information on their appointment and payment of public funds are contained in the U.S. Office of Personnel Management. Information on classification and grading standards and information on appointment and payment of public funds are contained in the U.S. Office of Personnel Management.

23. Position Review	Initials	Date	Initials	Date	Initials	Date	Initials	Date	Initials	Date
a. Employee (optional)										
b. Supervisor										
c. Classifier										

24. Remarks

BUS CODE: 1272, NACI, Position is at Full Performance Level

Cybersecurity Code: 00

25. Description of Major Duties and Responsibilities (See Attached)

## **POSITION DESCRIPTION**

**Industrial Hygienist, GS-0690-XX**

### **1) Introduction:**

The incumbent is a Green Environmental Management Systems (GEMS) Program Manager (Coordinator) at the [REDACTED] Veterans Affairs Health Care System [REDACTED] S). The incumbent directly reports to the facility Safety Manager and may serve as the designated Acting Safety Manager during the Safety Manager's absence. The incumbent functions as the primary environmental expert responsible to interpret and implement GEMS policies and programs in accordance with Veteran's Health Administration (VHA) and [REDACTED] policies and other guidance. The incumbent serves as the Chair of the GEMS Committee, overseeing, coordinating, documenting and guiding the implementation of VA GEMS policies across the [REDACTED] organizational elements.

### **2) Major Duties and Responsibilities:**

The incumbent analyzes GEMS related issues and problems, resulting in findings and conclusions that lead to continual improvement of environmental programs at the Health Care System (HCS). Apply environmental technology principles and practices to improve the operations of the [REDACTED] S with ecosystems, environmental media, human health and natural resources. Provides leadership and direction to management, and professional and technical and non-technical personnel regarding the development and implementation of facility GEMS Program.

As a GEMS program manager, the incumbent plans, organizes implements, oversees and provides technical assistance for projects and activities to resolve and prevent environmental problems. Assignments include, but are not limited to, wastewater treatment and disposal; safe drinking water; handling, storage, treatment and disposal of hazardous and non-hazardous wastes; release of hazardous material/spill response; air pollution control; environmental media permitting; toxic substances substitution with less toxic alternatives; sustainability programs and practices; and regulatory oversight.

Specific responsibilities related to management of HCS environmental programs are:

- Development and implementation of environmental policies, procedures and systems.
- Advising management on how environmental policies, procedures and systems will affect operations.

- Evaluation, modification and implementation of pollution prevention alternatives to reduce the generation of waste.
- Evaluation, modification and implementation of alternatives to reduce the consumption of resources and energy.
- Manages and/or provides technical advice regarding response to environmental emergencies including releases/spills of hazardous material.
- Facilitation of the exchange of environmental information to Health Care staff, including the development and implementation of training and educational programs related to environmental programs.
- Development and presentation of budgetary information related to environmental programs to upper level management.
- Management of computer programs and databases to enhance management of environmental programs.
- Review of expansion, modifications, closures of existing facilities and infrastructure; and how new construction of structure(s) and infrastructure will affect the environment, provide information that will minimize adverse impacts to human health and the environment and reduce vulnerability.
- Measurement of the effectiveness of existing environmental programs and recommendations for additions to environmental program(s) as needed to meet changing environmental requirements.
- Development of promotional and educational activities intended to increase stakeholder awareness of environmental issues.
- Provides technical expertise and serves as program manager, with responsibility for providing leadership guidance, technical assistance and evaluation for matters involving environmental technology and compliance (including environmental management systems and industrial hygiene).
- Plans, conducts or directs special studies concerned with occupational and environmental health and safety problems which require the development or modification of air sampling equipment (passive, active and real-time) or protective devices or the evaluation of control



measures for a specific operation, such as response to incidents of hazardous material spills or confined space entry air-monitoring.

- On the basis of sampling results, applies detailed knowledge associated with the facility's operations and knowledge of toxic or hazardous materials, prepares technical reports citing health, safety or environmental hazards and sets forth recommended actions for their control or elimination.
- Develops the facility's Green Environmental Management Systems (GEMS) Programs and assists with the development facility's decontamination program and respiratory protection programs.
- Performs work related to the management and operation of VHA healthcare facilities and programs that are needed to: protect the environment, protect human health from environmental pollution and improve air, land and water resources. The work requires knowledge of the organization of the facilities, as well as the construction, operation and maintenance of healthcare facilities. Also required is the knowledge of all systems related to controlling pollution, increasing sustainable practices (i.e. recycling, product substitution, energy efficiency, life cycle assessments, etc.) and protecting the environment.
- Plans and manages industrial hygiene and environmental projects/programs that are related to achieving and maintaining health, safety and environmental compliance, as well as developing and implementing environmental policy, guidance and procedures related to all environmental media.
- Resolves difficult and complex technical, project management and organizational problems using innovative and original approaches. Provide expert technical advice and guidance to senior management officials and staff members as to the appropriate handling of hazardous materials in accordance with the Hospital Incident Command Structure (HICS).
- Participates in developing courses of instruction for staff members, preparing course agendas, making arrangements for demonstrations, drills and giving technical instruction on environmental, safety, health and industrial hygiene subjects.
- Serves as the Contracting Officer's Representative (COR) for numerous contracts to include but not limited to Hazardous Waste, hazardous/non-hazardous pharmaceutical waste, dual (regulated medical & hazardous) waste contract.
- Responsible for the Spill Prevention Control and Countermeasure (SPCC) Plan.

- Responsible for overall oversight and compliance of facility's hazardous/non-hazardous pharmaceutical waste and dual (regulated medical & hazardous) waste contract.
- Serves as a Government Purchase Card Holder and Fund Control Point Clerk.

The incumbent provides advice on overall planning and programming requirements for the operations and maintenance of such programs. Advice rendered:

- Pertains to the interpretation, correspondence and implementation of (and compliance with) Iowa Department of Natural Resources (I-DNR) and the Environmental Protection Agency (EPA) policy directives and applicable procedures relating to subjects that involve GEMS, pollution prevention, sustainable practices, recycling, energy efficiency, exhaust air-modeling, affirmative procurement, and environmental compliance.
- Performs annual internal gap analyses of the GEMS Program in preparation for evaluation by VISN and other external environmental compliance auditors. Reviews implementation of GEMS policies and procedures and reports the status to facility senior management/VISN/VACO staff members. Discusses deficiencies and necessary remedial actions with appropriate HCS senior management and GEMS Committee, and develops and recommends preventive and corrective action.
- Assists VISN, VHA Center for Engineering & Occupational Safety and Health (CEOSH), and VACO with regional and national programs and activities by participating on formal technical review panels, professional and/or technical advisory groups (i.e. CP-Track PAG, HAIG environmental TAG, GEMSAG, etc.).

### 3) Factors:

#### Factor 1 – Knowledge Required By the Position

Knowledge and skill to develop and implement the facility's GEMS Program and provide oversight and technical support to facility's personal protective equipment programs as it relates to materials hazardous to the environment and/or personnel.

Mastery of advanced concepts, principles and practices of Hazardous Waste Regulations, Indoor Air Quality (IAQ), environmentally safe construction methods, healthcare decontamination waste water disposal, confined space entry, and fuel spill cleanup procedures.

Knowledge required to research technical literature and publications and applies technical knowledge to healthcare environmental and occupational health and safety issues.

Professional knowledge of industrial hygiene concepts, principles and practices that enables the employee to conduct industrial hygiene studies, to develop sampling or control methods and to provide expert advice to staff in a broad range of industrial hygiene matters, particularly related to GEMS Program policies, issues and problems.

#### Factor 2 – Supervisory Controls

The Safety Manager is the incumbent's direct supervisor. The incumbent is a program manager and works with a high degree of independence. Policy interpretations and implementation is left to the incumbent with only overall review by the supervisor to ensure that the mission and goals of the program(s) are met. The incumbent's completed work is considered technically accurate. Most all technical interaction between the incumbent and the supervisor is collaborative in nature. Further, the incumbent is commonly designated as the facility's acting Safety Manager in the absence of the Safety Manager.

#### Factor 3 – Guidelines

Primary guidelines are published Federal occupational health and safety standards, Federal environmental standards, state and local environmental regulations, Presidential Executive Orders, agency manuals and directives, technical journals and other publications of various professional associations, textbooks, reports on past studies and established practice, the VHA Center for Engineering & Occupational Safety and Health (CEOSH). There is a preponderance of new guidelines for GEMS Programs, and many of these guidelines will be replaced by new ones as policies continue to be developed. Guidelines are frequently inadequate for dealing with complex problems, such as hazards for which standards do not exist or for which established practices are not applicable, such as pharmaceutical wastes, dual wastes, decontamination or personal protective equipment. The employee may be required to apply new sampling techniques or personal protective equipment in controlling a particular health, safety or environmental hazard.

#### Factor 4 – Complexity

Assignments involve a full range of GEMS Program related environmental, health and safety programs. The employee must identify, evaluate and recommend control measures for any type of health, safety or environmental hazard to which workers are exposed. This involves dealing with new materials or processes that require the employee to modify techniques of evaluation and control. In addition, the employee is called on to research technical publications. Surveys involve evaluation of GEMS Program elements, including compliance assurance aspects, and progress on preventive and corrective action plans.

#### **Factor 5 – Scope and Effect**

The purpose of the work is to manage the GEMS Program for the primary and affiliated facilities (i.e. clinics, community-based outpatient clinics (CBOC), etc.). This calls for the investigation and analysis of a variety of healthcare operations to determine the presence and magnitude of environmental or occupational health or safety hazards, and their impact on the environment, and to recommend means for their control. Mastery of advanced concepts, principles and practices of health, safety and environmental management and compliance, personal protective equipment, and healthcare decontamination is required to cover the scope of responsibilities.

The work affects all operations at the primary and affiliate facilities and impacts on the environmental safety and health of patients, visitors and staff members.

#### **Factor 6 – Personal Contacts**

Contacts include the facility Director, safety personnel, industrial hygienists, research administrators, research staff members, clinical staff members, technical and non-technical staff members, VISN and VACO staff members and contractor personnel within the agency and staff members from other Federal agencies. Other contacts include regulatory agency personnel such as OSHA, EPA, JC, state and local employees.

#### **Factor 7 – Purpose of Contacts**

Contacts are to provide expertise on a wide range of health, industrial hygiene, safety, life safety and environmental problems to gain compliance with and support for effective safety, industrial hygiene and environmental protection practices. Contacts with contractors and agency management require skill and tact to overcome technical disagreements or to convince them of the necessity of certain control measures.

#### **Factor 8 – Physical Demands**

The work may require the employee to occasionally carry equipment. The employee will regularly handle, transport, store and package highly toxic materials and wastes (i.e. pharmaceutical wastes, chemotherapy wastes, dual wastes, etc.). Also, work activities will routinely involve walking, standing, bending, climbing or crawling during inspections or surveys.

#### **Factor 9 – Work Environment**



The employee is subjected to all the risks and discomforts associated with health, safety and environmental review activities of the agency. Also, exposures to highly hazardous materials and wastes including biological and chemical agents and will require the use of protective clothing and equipment, including respirators, protective gloves, aprons, face shields, hardhats, safety shoes and ear protectors. The incumbent may encounter exposures to radioactive agents.

#### 4) ADP Security

Protects printed and electronic files containing sensitive data in accordance with the provisions of the Privacy Act of 1974 and other applicable laws, federal regulations, VA statutes and policy, and VHA policy. Protects the data from unauthorized release or from loss, alteration, or unauthorized deletion. Follows applicable regulations and instructions regarding access to computerized files, release of access codes, etc., as set out in the computer access agreement that the employee signs.

\_\_\_\_\_

SECTION 1 - CONTACT INFORMATION	
<b>SUPERVISOR</b> Name: [REDACTED] Phone Number: [REDACTED]	<b>HR POC</b> Name: [REDACTED] Phone Number: [REDACTED]

Name: [REDACTED]  
Phone Number: [REDACTED]

Name: [REDACTED]  
Phone Number: [REDACTED]

**CURRENT/EXISTING POSITION INFORMATION** (If this is a NEW position description (PD), complete Proposed Position Information Section)

YES ☒ NO ☐ Is this PD currently encumbered? How many employees (total) are expected to be assigned to this PD? 1

YES ☐ NO ☒ Is the position career ladder/developmental, or does it require a statement of differences (SOD)? If YES, please attach documents (OF-8s and PDs)

YES ☐ NO ☒ Is the current PD being updated due to reorganization? If YES, please attach documents (current organization chart, new organization chart, reorganization approval documents, etc.)

YES ☒ NO ☐ Is the PD being updated with only minor changes? If yes, identify minor changes.

YES ☐ NO ☐ Is the PD being updated with major or significant changes? If YES, please describe the circumstances requiring the changes; include information regarding any other PDs which are currently performing the work described.

### PROPOSED POSITION INFORMATION

TITLE:		Pay Plan/Series/Grade:
YES <input type="checkbox"/>	NO <input type="checkbox"/>	Is this PD developmental to a higher graded PD that is already established? (If YES, please provide the CURRENT POSITION INFORMATION above.)
YES <input type="checkbox"/>	NO <input type="checkbox"/>	Will this PD have more than one employee assigned? How many employees (total) are expected to be assigned to this PD? _____
YES <input type="checkbox"/>	NO <input type="checkbox"/>	Will current employees be reassigned to this PD? If YES, PD # currently assigned to: _____ and how many employees/FTEs to be reassigned: _____
Is this PD	<input type="checkbox"/> NEW	(not previously established) If this a NEW PD, please describe the circumstances requiring the establishment of this PD; include information regarding any other PDs which are currently performing the work described:

YES ☐ NO ☐ Is this PD developmental to a higher graded PD that is already established? (If YES, please provide the CURRENT POSITION INFORMATION above.)

YES ☐ NO ☐ Will current employees be reassigned to this PD? If YES, PD # currently assigned to: \_\_\_\_\_ and how many employees/FTEs to be reassigned: \_\_\_\_\_

Additional comments/background information (alternate contact information, HCS priority number, special project info, special qualification requirements, e.g., qualified typist, CDL, driver's license, etc.):

Position Risk/Sensitivity Level Designation assigned: A1 - NACI (Required per HRML 05-14-02)

**SECTION 3 - PACKAGE REVIEW (to be completed or verified by HR POC)**

Review Purpose	Reviewer Initials/Date	Documents Provided/Submitted (Review by HR POC before submitting)	X or N/A
Position sensitivity code assigned (From Attachment A, HRML 05-14-02): <b>A1 (REQUIRED)</b>	BM 12/17/14	Current official (signed/dated) organization chart provided with proposed (New) or re-described position clearly identified.	XX
PD in proper format w/FES or narrative factors; supervisory PDs include both non-supervisory and supervisory evaluation factors in one PD.	BM 12/17/14	Properly completed OF-8(s), Position Description (coversheet) (submit first page only).	XX
Duties are adequately described, percentages assigned equal 100% (if applicable)	BM 12/17/14	New/updated PD provided in Word format	XX
Required statements included (GEMS, ADP, etc.)	BM 12/17/14	Current classified PD provided or available on SharePoint	XX
OF-8(s), Position Description (coversheet) properly completed; all appropriate blocks are checked, correct organizational location of position in Blocks 18-18e, and signed/dated	BM 12/17/14	Completed PDAT (optional - <b>NOTE:</b> The VISN23 HR-CCU SharePoint PD Library is the Official PD File. HR POCs are responsible for ensuring that the completed PDAT is attached to the classified PD prior to uploading it to the Library.)	XX
Position Management Review & Approval Completed	BM 12/17/14	Other misc. documents (EEO, union, reorganization, etc.)	
BUS Code # assigned: 1272	BM 12/17/14		

Position sensitivity code assigned (From Attachment A, HRML 05-14-02): <b>A1 (REQUIRED)</b>	BM 12/17/14	Current official (signed/dated) organization chart provided with proposed (New) or re-described position clearly identified.
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supervisory evaluation factors in one PD.		
Duties are adequately described, percentages assigned	RM 12/17/14	New/updated PD provided in Word format

Required statements included (GEMS, ADP, etc.)	BM 12/17/14	Current classified PD provided or available on SharePoint
OF-8(s), Position Description (coversheet) properly	RM	Completed PDAT (optional - <b>NOTE:</b> The VISN23 HR-CCU

Position Management Review & Approval Completed	BM 12/17/14	Other misc. documents (EEO, union, reorganization, etc.)
BUS Code # assigned: 1272	BM 12/17/14	

All of [REDACTED]  
[REDACTED] 17  
[REDACTED] Signature/Date  
[REDACTED] Date Uploaded to CCU

Specialist: McPeak		Case # Assigned:	Date Review Started: 12/18/2014
Comments:			
Disposition: <input checked="" type="checkbox"/> Completed <input type="checkbox"/> Returned		Signature: [Redacted]	Date: 12/22/2014

Comments: [REDACTED]

Updated 08/22/2014 (supersedes version dated 07/02/2014)

U.S. OFFICE OF PERSONNEL MANAGEMENT

INVESTIGATE POSITION DESIGNATION OF NATIONAL SECURITY AND PUBLIC TRUST POSITIONS  
(SUMMARY)

## Position Designation Record

Agency	DEPT OF VETERANS AFFAIRS
Position Title	INDUSTRIAL HYGIENIST
Series and Grade/Pay	GS-0690-12
Band	
Position Description	0
Number	

### Potential for Compromise or Damage

Duties	Degree of Potential for Compromise or Damage
Government service delivery, including customer service or public liaison duties	<ul style="list-style-type: none"><li>Duties involve customer service responsibilities and/or public liaison that could cause limited damage to individuals, business entities, or government programs or operations</li></ul>

### Adjustment for Program Designation and Level of Supervision

Adjustments	Label
Adjustment for Scope of Program and Correlation to Extent of Impact (see definitions)	Agency impact
Adjustment for level of supervision or other controls	Limited or no supervision - ability to act independently in almost all areas almost all of the time

Total Points Designation	Suitability
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Label	Points	Investigation	Form Required
Total Initial Position Designation Points from Step 2	1	NACI	SF 85
Adjusted Position Designation Points from Step 3	11		

Signature:



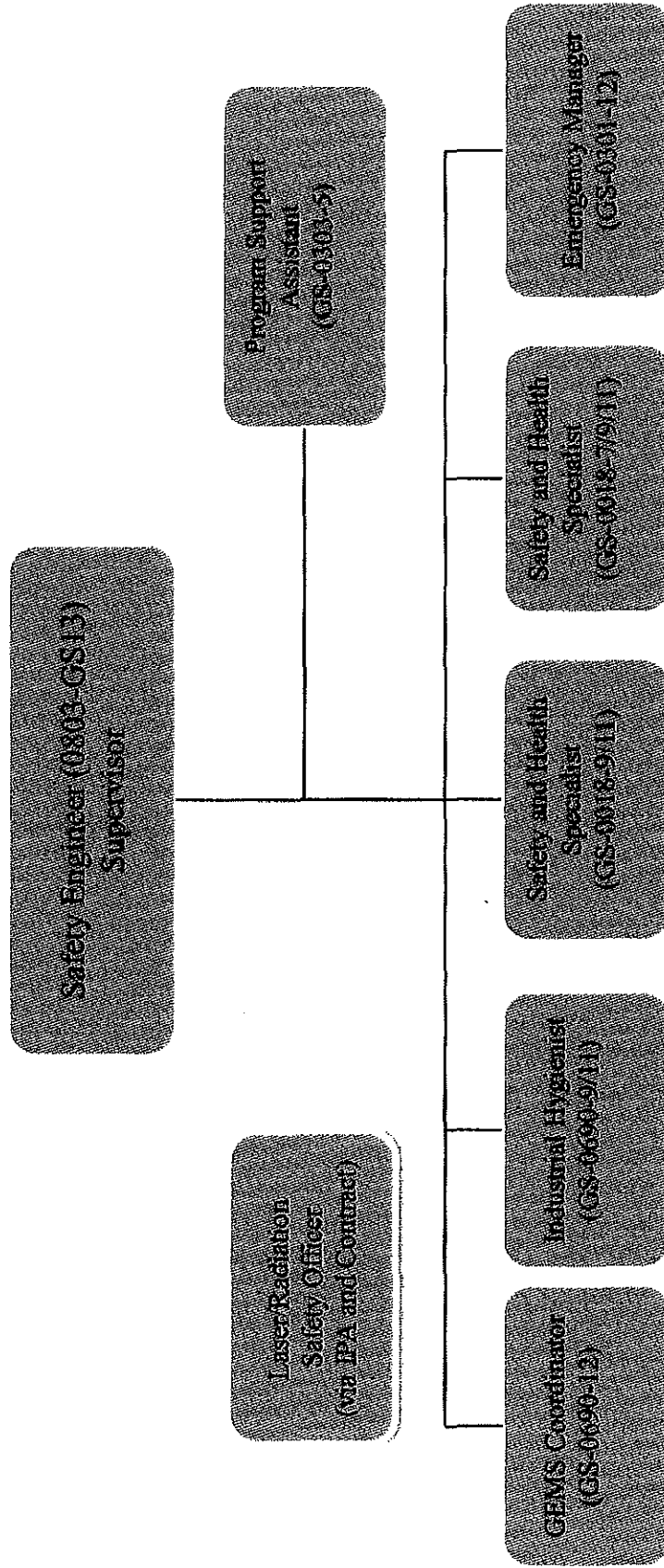
Date: 12/17/2014

Name:

 LEAD HRS



# Safety Office Organizational Chart



**HR-CCU POSITION CLASSIFICATION EVALUATION STATEMENT**

**Current Title/Series/Grade:** Industrial Hygienist, GS-0690-12

**Proposed Title/Series/Grade:** Industrial Hygienist, GS-0690-12

**Final Title/Series/Grade:** Industrial Hygienist, GS-0690-11

**Organizational Location:** VA Health Care System  
AD - Safety Service  
VA Health Care System

**References:** Current Position Description (PD), PD# 4272

New Position Description (PD)

Industrial Hygiene Series, GS-0690 TS-46 October 1980

OPM decision number: C-0690-11-01

**Background:** The incumbent is a Green Environmental Management Systems (GEMS) Program Manager (Coordinator) at the Veterans Affairs Health Care System ( ). The incumbent directly reports to the facility Safety Manager and may serve as the designated Acting Safety Manager during the Safety Manager's absence. The incumbent functions as the primary environmental expert responsible to interpret and implement GEMS policies and programs in accordance with Veteran's Health Administration (VHA) and policies and other guidance. The incumbent serves as the Chair of the GEMS Committee, overseeing, coordinating, documenting and guiding the implementation of VA GEMS policies across the organizational elements.

**Series & Title Determination:** The GS-0690 Classification Standard states: *This series includes all classes of positions the duties of which are to advise on, administer, supervise, manage, or perform professional and scientific work in industrial hygiene, including the identification and evaluation of conditions affecting the health and efficiency of employees, or the citizens of the adjacent community, the formulation and recommendation of measures to eliminate or control occupational health hazards, and the promotion of occupational health programs for instructing and motivating managers and employees in the prevention as well as correction of potential health hazards.* This best describes the position in that it is primarily executing health and safety programs to ensure the well-being of an employee population in a (medical care facility) setting.

**Grade Determination:** Both the Classification Standard and the PD are written in the 9 factor FES format.

**Factor 1: Knowledge Required by the Position**

**FL 1-7**

**1250 points**

Knowledge and skill to develop and implement the facility's GEMS Program and provide oversight and technical support to facility's personal protective equipment programs as it relates to materials hazardous to the environment and/or personnel.

Mastery of advanced concepts, principles and practices of Hazardous Waste Regulations, Indoor Air Quality (IAQ), environmentally safe construction methods, healthcare decontamination waste water disposal, confined space entry, and fuel spill cleanup procedures.

Knowledge required to research technical literature and publications and applies technical knowledge to healthcare environmental and occupational health and safety issues.

Professional knowledge of industrial hygiene concepts, principles and practices that enables the employee to conduct industrial hygiene studies, to develop sampling or control methods and to provide expert advice to staff in a broad range of industrial hygiene matters, particularly related to GEMS Program policies, issues and problems.

Factor 1-6 states: *In addition to the basic foundation in the physical or life sciences, or engineering, described at level 1-5, a knowledge of the conventional methods, techniques, and principles of industrial hygiene is required at this level, which enables the employee to independently perform assignments related to the identification, evaluation, and control of industrial health hazards. These assignments are limited in scope and depth by such characteristics as:*

- The industrial processes are of limited size and/or complexity.*
- Associated hazards of the operation, such as the toxicity of the materials used, are generally known; standard sampling and analytical methods have been developed; and safe limits have been established and are generally accepted within the profession.*
- The control of hazards can be accomplished by conventional means.*

This position exceeds 1-6 in that the environment operated in is not so clearly defined as described here. Emerging medical practices, coupled with the indexed problems derived from a multi Service Line Medical Center fosters an environment far more demanding than what is described by 1-6.

Factor 1-7 States: *This level requires professional knowledge and skills applicable to the performance of industrial hygiene duties related to a wide range of industrial settings; or, an*

*intensive knowledge of a specialty area of industrial hygiene (chemical aspects, etc.). Examples of assignments representing this level of knowledge are: skill in identifying, evaluating, and controlling a wide variety of occupational health hazards associated with the entire range of industrial work operations; skill in modifying approaches or applications within a specialty area to such difficult problems as sampling method development, high temperature exhaust ventilation control, and establishing personal protective equipment requirements; or a knowledge of the full range of sampling techniques and control measures, as well as a knowledge of administrative and managerial principles and procedures, to plan, implement, and evaluate an industrial hygiene program covering occupational health hazards found in all but the most complex industrial environments.* This best describes the position in its two primary roles of facility hazards mitigation and facility stakeholder training.

Factor 1-8 states: *This level includes: mastery of the professional concepts, principles, and practices of industrial hygiene that would enable the industrial hygienist to apply experienced judgment and a knowledge of new developments to solve novel or obscure problems; an ability to extend and modify existing techniques; and skill in developing new approaches which may be used by other industrial hygienists in solving a variety of occupational health problems.* Typically, the employee is recognized by the agency as being an expert in the broad practice of industrial hygiene or in a major specialization, such as chemical, toxicological, or engineering aspects. The PD takes language directly from factor 1-8. However, factor 8 is not appropriate based on both the duties of the position and its placement in the organization. It isn't developing product for subordinate hygienist. Nor is it an "Agency" expert with a highly focalized specialty, but acts as a generalist at a facility level.

## **Factor 2: Supervisory Controls**

**FL 2-4**

**450 points**

The Safety Manager is the incumbent's direct supervisor. The incumbent is a program manager and works with a high degree of independence. Policy interpretations and implementation is left to the incumbent with only overall review by the supervisor to ensure that the mission and goals of the program(s) are met. The incumbent's completed work is considered technically accurate. Most all technical interaction between the incumbent and the supervisor is collaborative in nature. Further, the incumbent is commonly designated as the facility's acting Safety Manager in the absence of the Safety Manager.

Factor 2-3 states: *The supervisor or designated employee outlines or discusses possible problem areas and defines objectives, plans, priorities, and deadlines. The supervisor or designated employee provides assistance on controversial or unusual situations without clear precedents. The employee: independently plans and carries out the assignments in conformance with accepted policies and practices; adheres to instructions, policies, precedents, and guidelines in exercising judgment to resolve commonly encountered work problems and deviations; and brings controversial information or unusual findings to the supervisor's attention for direction. The supervisor or designated employee reviews completed work for conformity with policy, technical soundness, adherence to deadlines, and accomplishment of objectives. The supervisor does not usually review methods used to complete the assignment.*

This position exceeds 2-3 as the employee receives less direction up front and less “technical” oversight regarding its final output.

Factor 2-4 states: *The supervisor outlines overall objectives and available resources. The employee and supervisor, in consultation, discuss scope of the assignment, approaches, time frames, and possible execution phases. The employee: plans and carries out the assignment; resolves most conflicts independently; coordinates the work with others as necessary; interprets policy and regulatory requirements in terms of established objectives; keeps the supervisor informed of progress and potentially controversial problems, concerns, issues, or other matters; develops changes to plans and/or methodology; and provides recommendations for improvements in order to meet program objectives. The supervisor reviews completed work for soundness of overall approach, effectiveness in meeting requirements or producing expected results, the feasibility of recommendations, and adherence to requirements. This best describes the position in that it is given parameters up-front, has extreme autonomy in operating within those parameters, and whose final product is reviewed by the overall management community in gauging its applicability to integrated health care production. This is demonstrated by the nature of contacts of the PD as well (factor 7).*

Factor 2-5 states: *The supervisor provides administrative and policy direction in terms of broadly defined missions or functions of the agency. The employee: defines objectives; interprets policies promulgated by authorities which are senior to the immediate supervisor and determines their effect on program needs; independently plans, designs, and carries out work to be done; and serves as a technical authority. The supervisor: reviews work for consistency with, and potential impact on, broad agency objectives and program goals, and for contribution to the advancement of the field; normally accepts work as being technically authoritative; and normally accepts work without significant change. This position does not meet 2-5 in that this higher level deals with more theoretical development versus meeting the needs of a production/line-operations oriented facility.*

### **Factor 3: Guidelines**

**FL 3-3**

**275 points**

Primary guidelines are published Federal occupational health and safety standards, Federal environmental standards, state and local environmental regulations, Presidential Executive Orders, agency manuals and directives, technical journals and other publications of various professional associations, textbooks, reports on past studies and established practice, the VHA Center for Engineering & Occupational Safety and Health (CEOSH). There is a preponderance of new guidelines for GEMS Programs, and many of these guidelines will be replaced by new ones as policies continue to be developed. Guidelines are frequently inadequate for dealing with complex problems, such as hazards for which standards do not exist or for which established practices are not applicable, such as pharmaceutical wastes, dual wastes, decontamination or personal protective equipment. The employee may be required to apply new sampling techniques or personal protective equipment in controlling a particular health, safety or environmental hazard.



Factor 3-2 states: *Established procedures and specific guidelines are available to the employee in the performance of assignments. When detailed written guidelines are lacking, the employee is provided with oral instructions. Judgment is required in locating and selecting the most appropriate guidelines and references for use in specific cases. Established procedures are to be used in the performance of work, but the employee may exercise discretion in selecting among alternative approaches. The employee may, on an infrequent or irregular basis, make minor deviations and adapt the guidelines to specific cases. Situations requiring significant deviations from existing guidelines are referred to the supervisor. This position exceeds the black and white environment described in 3-2. Conditions on the ground, as well as directives from above, are constantly evolving requiring modification of outputs.*

Factor 3-3 states: *Guidelines include Federal standards and criteria documents, standards published by recognized organizations and professional societies, technical literature, agency policies and regulations, precedents, office files, and standard practices. While these guidelines are available, they are not always completely applicable to the work. The industrial hygienist independently selects, evaluates, and applies the guides, making adaptations then necessary, or recommending changes. In addition, the industrial hygienist must exercise judgment in applying standard practices to new situations and in relating new work situations to precedent ones. This best describes the position in that it adapts guidelines to emerging situations, but is restricted by regulatory entities and higher agency officials on how far those modifications may go.*

Factor 3-4 states: *The guidelines are essentially the same as in Level 3-3. However, the work assignments are such that these guidelines are often inadequate in dealing with the more complex or unusual problems, such as treating hazards for which very little information on toxicity is available. The industrial hygienist must adapt and apply industrial hygiene principles and practices to situations where precedents are not directly applicable and must use experienced judgment and initiative in selecting approaches, evaluating findings, and researching new developments in the field. In some cases, the employee must engage in an extensive literature search to locate suitable information. Some situations require the employee to devise new approaches or develop new methods for evaluating or controlling a health hazard. Language of the PD was copied near verbatim from the Classification standard. However, this type of deviation from guidelines is confined to higher "agency" entities than a local hygienist reporting to a Supervisory Engineer with final authority on the most complex issues.*

#### **Factor 4: Complexity**

**FL 4-4**

**225 points**

Assignments involve a full range of GEMS Program related environmental, health and safety programs. The employee must identify, evaluate and recommend control measures for any type of health, safety or environmental hazard to which workers are exposed. This involves dealing with new materials or processes that require the employee to modify techniques of evaluation and control. In addition, the employee is called on to research technical publications. Surveys

involve evaluation of GEMS Program elements, including compliance assurance aspects, and progress on preventive and corrective action plans.

Factor 4-3 states: *Assignments involve various interrelated tasks applicable to the recognition, evaluation, and control of occupational health hazards, such as determining compliance with established threshold limit values, evaluating exposures, and advising on control measures and changes in work procedures or schedules to comply with established health requirements. Analyses require many different standard methods to determine the nature and amount of toxic material present in various materials, such as environmental samples, body fluids, and industrial products. The employee determines measurements to be made, and the methods and equipment to be used. Projects assigned are generally conventional and pose few unusual problems. Work activities to be inspected or evaluated typically cover small industrial operations where work processes are relatively straightforward, and hazardous exposures can be identified and controlled through established practice or minor adaptation of precedents. This position exceeds the mundane environment described here where issues are both well-defined and static. 4-3 is exceeded.*

Factor 4-4 states: *Assignments cover the full spectrum of occupational health hazards found in all but the most complex industrial environments. Thus, the assigned work activities involve a substantial amount and variety of exposure to chemical, physical, bacteriological and/or radiological hazards. The employee must recognize hazards which are uncommon, evaluate a variety of data, and institute or recommend effective control measures to protect the workers. Factors to be considered include unusual work processes or operations, exotic chemicals for which toxicological information may be incomplete, and the need to adapt or modify precedent methods in the control of hazardous exposures. This best describes the medical center environment inherent to all VHA health care facilities.*

Factor 4-5 states: *Work includes a broad range of activities and involves the identification and treatment of novel or obscure problems which require the employee to be versatile and innovative in adapting and modifying precedents, methods and techniques. Assignments are characterized by many difficult considerations due to breadth, diversity, or intensity of occupational health problems encountered. Examples of factors to be considered include (1) major areas of uncertainty resulting from complicated work processes, such as highly complex research and developmental work; (2) the need to develop new methodologies for the evaluation and control of a particular health hazard where relevant literature is inadequate or nonexistent; (3) serious conflicts between industrial hygiene and management considerations; (4) health effects from long-term, chronic exposures are unknown or poorly defined; or (5) exposures are complicated by mixtures of toxic and/or physical hazards. Work often includes originating new techniques and developing new information for use by other occupational health personnel. This position does not meet the full intent of 4-5. While it does adapt methods, it is not tasked with advancing the state of the art as is alluded to by 4-5. Furthermore, conflicts with management are limited as safety and health is the PARAMOUNT consideration of facilities management and the actual Safety Manager is specifically assigned to mitigate the greatest controversies.*

**Factor 5: Scope and Effect**

**FL 5-4**

**225 points**

The purpose of the work is to manage the GEMS Program for the primary and affiliated facilities (i.e. clinics, community-based outpatient clinics (CBOC), etc.). This calls for the investigation and analysis of a variety of healthcare operations to determine the presence and magnitude of environmental or occupational health or safety hazards, and their impact on the environment, and to recommend means for their control. Mastery of advanced concepts, principles and practices of health, safety and environmental management and compliance, personal protective equipment, and healthcare decontamination is required to cover the scope of responsibilities.

The work affects all operations at the primary and affiliate facilities and impacts on the environmental safety and health of patients, visitors and staff members.

Factor 5-3 states: *The purpose of the work is to investigate and analyze a variety of problems or conditions in the workplace which may adversely affect the health of workers, and to provide or recommend ways of eliminating problems. The work affects the design and operation of equipment, work processes, or systems (such as evaluation of the adequacy of occupational health protection devices); the adequacy of inspections or surveys; and the health and well-being of the workers.* This position comes close to fitting into 5-3, but ultimately exceeds it based on its nexus to facility planning, education, and incorporation of emerging knowledge to daily operations.

Factor 5-4 states: *The purpose of the work is to provide expertise as a specialist in the broad practice of industrial hygiene, or in a specialty area of industrial hygiene, by furnishing advisory, planning, or reviewing services on specific problems, projects, or programs, and operating conditions directly affecting worker health and safety. The work may include the development of criteria, procedures, or instructions for major agency activities, or the investigation, analysis, and evaluation of complex problems and situations.* This best describes the position in its role in monitoring, planning, and education an entire Medical Center.

Factor 5-5 states: *The purpose of the work is to resolve critical problems, to isolate and define unknown conditions, or to develop new approaches, methods, guides or standards for use by other occupational health specialists. Often serving as a consultant or project coordinator, the industrial hygienist provides expert advice and guidance covering a broad range of activities to officials, managers, and other occupational health professionals within or outside the agency. Results affect the work of other occupational health experts both within and outside the agency or the development of major aspects of the agency's occupational health program.* Again, this factor applies to agency (VHA) or large region (VISN) staff with broad impact over positions such as this operating in a field setting.

**Factor 6: Personal Contacts****FL 6-3****60 points**

Contacts include the facility Director, safety personnel, industrial hygienists, research administrators, research staff members, clinical staff members, technical and non-technical staff members, VISN and VACO staff members and contractor personnel within the agency and staff members from other Federal agencies. Other contacts include regulatory agency personnel such as OSHA, EPA, JC, state and local employees.

Factor 6-2 states: *Personal contacts are with a number of employees in the agency, but outside the immediate office, including other industrial hygienists, occupational physicians, attorneys, toxicologists, laboratory chemists, safety engineers and specialists, design and maintenance engineers, and supporting technicians. Also, included at this level are contacts with workers in the private sector during the monitoring of possible hazards. The position's interaction with higher echelons to incorporate emerging knowledge and practices causes the position to exceed 6-2.*

Factor 6-3 states: *In addition to the intra-agency contacts described in Level 6-2, contacts include a variety of officials, managers and professionals of other agencies or outside organizations. Included are contacts with industrial hygiene experts from other agencies, universities, and professional associations; with management representatives in private industry or Federal agencies; with labor representatives, contractors, engineers, and safety specialists within private companies or agency plants; and with a variety of experts within related occupational health and safety fields. These contacts are not established on a routine basis, but vary as to the purpose and extent of the contacts, and as to the roles and authority of the parties involved. This best describes the position in that it interacts with the full employee spectrum within the facility as well as having a robust partnership with external (but localized) stake holders.*

Factor 6-4 states: *Personal contacts are with high-ranking officials from outside the agency, including top managerial, health, or scientific personnel of other agencies, State and local governments, private industry, and public groups (e. g., Assistant Secretaries, Department heads for State Governments or for major cities). These contacts are characterized by highly unstructured settings (e.g., unprecedented situations, difficulties in obtaining access to the officials, or unclear or widely varying roles and authorities). This factor better describes a VACO position which is several organizational levels above this facility-level position.*

**Factor 7: Purpose of Contacts****FL 7- 3****120 points**

Contacts are to provide expertise on a wide range of health, industrial hygiene, safety, life safety and environmental problems to gain compliance with and support for effective safety, industrial hygiene and environmental protection practices. Contacts with contractors and agency management require skill and tact to overcome technical disagreements or to convince them of the necessity of certain control measures.

Factor 7-2 states: *In addition to the exchange of information, the purpose of contacts is to plan and coordinate work efforts with co-workers and plant management, and to provide advice to management and employees concerning the potential health hazards associated with their work operations. Although there may be difficulties encountered in coordinating these efforts and although there may be many disagreements in resolving problems encountered, the persons contacted are usually working toward mutual goals and generally have cooperative attitudes. This position does more than exchange information, it formulates and analyzes it.*

Factor 7-3 states: *The purpose of contacts is to promote good industrial health practices, and to investigate and evaluate working conditions in order to gain compliance with occupational health and safety standards, policies, and regulations. These contacts often involve dealing with skeptical or uncooperative persons, and include serious technical disagreements and difficult labor-management relations. Thus, the employee is required to exercise tact and to be skillful in gaining the confidence and cooperation of those contacted.* This best describes the employee's environment of sorting out difficulties between stakeholders in reaching mutual goals, and as the position's role of primary facility educator regarding health and safety.

Factor 7-4 states: *Contacts are to justify, defend, negotiate, or settle highly significant or controversial occupational health matters. The industrial hygienist often represents the agency in professional conferences or committees for planning extensive and long-range occupational health programs and for developing standards and guides for broad application. Often, those contacted have different viewpoints or objectives, requiring the industrial hygienist to convince others or to arrive at compromises or suitable alternatives.* This describes a more contentious relationship than what is enjoyed between the employee and their partners. The most contentious issues remain the responsibility of the Safety Manager.

### **Factor 8: Physical Demands**

**FL 8-2**

**20 points**

The work may require the employee to occasionally carry equipment. The employee will regularly handle, transport, store and package highly toxic materials and wastes (i.e. pharmaceutical wastes, chemotherapy wastes, dual wastes, etc.). Also, work activities will routinely involve walking, standing, bending, climbing or crawling during inspections or surveys.

Factor 8-1 states: *The work is generally sedentary, although there may be some walking or bending during infrequent walk-through inspections of worksites.*

Factor 8-2 states: *The work includes frequent inspections or surveys of industrial workplaces, requiring the employee to carry a considerable amount of equipment, and involve a good deal of walking, standing, bending, and climbing.* This best describes the position in that it is neither sedentary (policy duties), nor subjected to extreme conditions such as continual exposure to hazardous materials (technical duties).



Factor 8-3 states: *The work requires frequent and protracted periods of strenuous physical exertion, such as long periods of climbing, crouching, or crawling in confined spaces or around and between operating equipment while carrying moderately heavy equipment (20-30 pounds or more) and while wearing protective clothing.*

### **Factor 9: Work Environment**

**FL 9-2**

**20 points**

The employee is subjected to all the risks and discomforts associated with health, safety and environmental review activities of the agency. Also, exposures to highly hazardous materials and wastes including biological and chemical agents and will require the use of protective clothing and equipment, including respirators, protective gloves, aprons, face shields, hardhats, safety shoes and ear protectors. The incumbent may encounter exposures to radioactive agents.

Factor 9-1 states: *Work is usually performed in an office setting, although there may be occasional exposure to industrial hazards during infrequent walk-through surveys that are conducted as part of a larger study.* The position's inspection and observation duties require it to be regularly present in clinical environments where exposure to chemical, biological, and hazardous element are almost equivalent to that of the clinical staff. 9-1 is exceeded.

Factor 9-2 states: *During inspections or surveys, there is regular exposure to all of the hazards and discomforts to which the workers are subjected, including a wide range of toxic chemicals, physical stresses, and safety hazards. The employee must use a variety of protective equipment and clothing, such as respirators, ear plugs, gloves, coveralls, hard hats, etc.* This best describes the position in that it occupies a grey area between office professional and medical staff services.

Factor 9-3 states: *Work involves regular and recurring exposure to potentially dangerous or hazardous situations, such as working with explosives or incendiary materials; working at great heights under temperature extremes; or working around fatal viruses, areas devoid of oxygen, containing harmful bacteria, or emitting hydrogen sulfide. A variety of health and safety precautions are necessary as two or more potentially hazardous conditions may occur simultaneously.* The hospital environment is VERY controlled, especially for non-clinician positions such as this. Thus, 9-3 is not warranted.

### **Summary:**

<b>Factor 1: knowledge Required by the Position</b>	<b>FL 1- 7</b>	<b>1250 points</b>
<b>Factor 2: Supervisory Controls</b>	<b>FL 2- 4</b>	<b>450 points</b>
<b>Factor 3: Guidelines</b>	<b>FL 3- 3</b>	<b>275 points</b>
<b>Factor 4: Complexity</b>	<b>FL 4- 4</b>	<b>225 points</b>
<b>Factor 5: Scope and Effect</b>	<b>FL 5- 4</b>	<b>225 points</b>
<b>Factor 6: Personal Contacts</b>	<b>FL 6- 3</b>	<b>60 ponts</b>
<b>Factor 7: Purpose of Contacts</b>	<b>FL 7- 3</b>	<b>120 points</b>

**Factor 8: Physical Demands**  
**Factor 9: Work Environment**

**FL 8- 2      20 points**

**FL 9- 2      20 points**

**Total            2645 points**

The total points assigned are 2645; this equates to grade 11. The point range for GS-11 is 2355-2750.

GS-0690-11 Benchmarks 2 and 3 closely mirrored the position. Benchmarks for the GS-12 level spoke about things like regulatory citations, team lead, and regional and large industrial complex impacts. All of which exceeded the nature of this single facility position working within a larger team.


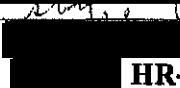
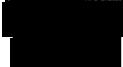
**FLSA Determination:** Non-Exempt

**Conclusion:** The position is properly classified as a Industrial Hygienist, GS-0690-11

**Consistency Review:** VISN CCUs are mandated by OHRM to review all outstanding OHRM and OPM Classification appeal decisions against Classification of Position Descriptions. This review is made to put the evaluation within the proper context and address OPM concerns of lack of Classification consistency across VA facilities, not to override official OPM Classification standards.

OPM decision number: C-0690-11-01 was reviewed for verification of this independent determination. That appeal reviewed a near identical position, and confirmed this evaluation. Several OHRM appeals were reviewed that were at the GS-12 level. Those positions were the actual Safety Managers of their facilities (reflecting these facilities Supervisory Safety Engineer).

**Evaluated by:**

  
 Supervisory HR Specialist (Classification) 12/22/2014  
 HR-CCU Date

OHRM concurrence received 1/22/2015. sdm



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Merit System  
Accountability and  
Compliance

Ms. Stephanie Boyd  
Acting Director, Compensation and Classification Service (055)  
Office of Human Resources Management  
U.S. Department of Veterans Affairs  
stephanie.boyd@va.gov

October 7, 2015

Dear Ms. Boyd:

Enclosed is our decision on the classification appeal of [REDACTED] who works at the [REDACTED] Veterans Affairs Health Care System in [REDACTED]. We have determined his position is properly classified as Industrial Hygienist, GS-690-11. (OPM decision number C-0690-11-03).

The appellant's submissions indicate a number of other Green Environmental Management Systems (GEMS) Coordinator positions in your agency are similar or identical to his position but are classified at a higher grade level (see enclosures). Those positions may, therefore, be classified inconsistently with our appeal decision. Consequently, in accordance with the *Introduction to the Position Classification Standards*, appendix 4, section I, we are requiring you to furnish an intra-agency classification consistency report on GEMS Coordinator positions throughout the Veterans Health Administration within 90 days after the date of this letter and provide the results of the review to the appellant. Please send your final report to:

Classification and Pay Claims  
Program Manager  
Agency Compliance and Evaluation  
Merit System Accountability and Compliance  
U.S. Office of Personnel Management  
1900 E Street, NW, Room 6484  
Washington, DC 20415

Your assistance in this matter is greatly appreciated. If you have questions, please contact me at (215) 861-3102 or at [robert.hendler@opm.gov](mailto:robert.hendler@opm.gov)

Sincerely,

Robert D. Hendler  
Classification and Pay Claims  
Program Manager  
Agency Compliance and Evaluation

Enclosures

[REDACTED]  
February 6, 2015

**Regarding:** Appeal of [REDACTED] VA Health Care System ([REDACTED] S), Industrial Hygienist - Green Environmental Management Systems (IH/GEMS) Program Manager Classification Dated December 22, 2014.

**Appeal Statement:**

I, [REDACTED], wish to appeal the classification or grading of my position ([REDACTED] [REDACTED]), Industrial Hygienist - Green Environmental Management Systems (IH/GEMS) Program Manager).

[REDACTED]  
Signature

2/6/15  
Date

**VA Facility:**

[REDACTED] VA Health Care System (636A8)

**Assignment:**

Safety Office (001C)



**Position Details:**

Current Title: Industrial Hygienist - Green Environmental Management Systems (IH/GEMS) Program Manager

Pay Plan: General Schedule

Series: 0690

Grade: 12

mjl/position classification appeal - 0690 [REDACTED] S - ih-gems program manager(2)/2/6/2015

**Requested Action:**

Grade: At a minimum the [REDACTED] VA Health Care System's [REDACTED] Industrial Hygienist - Green Environmental Management Systems (GEMS) Program Manager position should remain graded at the 12 level.

**Accuracy of Official Position Description Statement:**

I, [REDACTED], believe that the current position description for the [REDACTED] VA Health Care System ([REDACTED]S), Industrial Hygienist - Green Environmental Management Systems (IH/GEMS) Program Manager is accurate.

**Statements identifying the reasons why the position should be classified differently:**

National Perspective Associated with GEMS Coordinator/Program Manager Positions:

I have been the [REDACTED] IH/GEMS Program Manager for nearly ten years and during this time I have had the distinct pleasure to be asked to serve as a member of multiple VHA technical and professional environmental advisory groups. It should be noted that these environmental advisory groups were established to represent the VHA professional community in maintaining excellence and continual improvement in environmental programs. This is accomplished by the advisory groups developing and updating the scope and depth of the environmental programs through guidebooks and other data driven programs. The specific VHA advisory groups that I have served on include:

- VHA Center for Engineering & Occupational Safety and Health (CEOSH) Compliance and Process (CP)-Track Professional Advisory Group (PAG) from 2006 to present.
- VHA Healthcare Analysis & Information Group (HAIG) Environmental Survey Technical Advisory Group (TAG) from 2007 to present.
- VHA Safety and Environmental Advisory Board (SEAB) in 2013.
- VHA Green Environmental Management Systems Advisory Group (GEMSAG) from 2011 to present. Further, I served as the Vice Chair and Chair of this group in 2012 and 2013, respectively.

Through my past and on-going service on multiple VHA advisory groups I have had professional and personal interactions with the majority of facility-level and VISN-level GEMS Coordinators/Program Managers from across VHA. As a result, I'm very well aware of the series and grade of the VHA facility-level GEMS Coordinators/Program Managers positions. Specifically, based upon



the results from 2013 VHA HAIG Environmental Survey, which is a mandatory VHA reporting requirement for all facility-level GEMS Coordinators/Program Managers, the following can be concluded:

- A total of 124 facility-level GEMS Coordinators/Program Managers responded to the survey.
- The majority (86 of 124, 70%) of facility-level GEMS Coordinators/Program Managers had a current grade of GS 12.
- The largest number (51 of 124, 41%) of facility-level GEMS Coordinators/Program Managers had a job series of 0690: Industrial Hygienist.
- Of the 51 facility-level GEMS Coordinators/Program Managers with a job series of 0690: Industrial Hygienist, 41 (80%) had a current grade of GS 12 and 3 (6%) have a current grade of GS 13.

As a result, I'm very concerned and puzzled that my position has been graded at a lower level (GS 11). As noted previously, I'm familiar with many of the other facility-level GEMS Coordinators/Program Managers positions and I'm not aware of any that are responsible for or conducting as many complex and hazardous activities as my position requires. In turn, I would like to know why my position isn't being graded at the same level as the three (3) facility-level GEMS Coordinators/Program Managers positions that are at the Palo Alto VA HCS, San Francisco VA HCS, and Southern Arizona VA HCS, which have a job series of 0690: Industrial Hygienist and grade of GS 13.

#### An Industrial Hygiene Professionals Perspective:

My educational background includes: a Bachelor of Science (BS) degree in Chemical Engineering; Master of Science (MS) degree in Preventive Medicine and Environmental Health: Industrial Hygiene; and a Doctor of Philosophy (PhD) degree in Occupational and Environmental Health: Industrial Hygiene. I hold multiple health, safety and environmental credentials: Certified Industrial Hygienist (CIH) in Comprehensive Practice; Certified Safety Professional (CSP) in Comprehensive Practice; and Engineer in Training (EIT). I have been a member of the American Industrial Hygiene Associations (AIHA) and Iowa-Illinois AIHA Local Section since 1988. I have served as a member and officer of multiple AIHA technical advisory committees or groups:

- Exposure Assessments Strategies Committee from 1991 – 1993.
- Noise Committee from 2002 to present.
- Safety Committee from 2003 to present.
- Health Care Working Group from 2006 to present. I have served as the Chair twice (2009 - 2010 and 2013 - 2014).

As a further indication of my extensive industrial hygiene background, knowledge and expertise, in 2013 I was bestowed the honor of AIHA Fellow. I'm one of approximately 200 other AIHA members that are AIHA Fellows and this organizations membership is over 8,000. Having said all of this, I'm well aware of the training, knowledge and expertise needed to consider someone as a qualified and competent industrial hygienist. Further, depending upon the geographical location in the U.S., a competent and qualified industrial hygienist can be difficult to recruit and retain. As a specific example of this limitation, an industrial hygienist position graded at the GS 11 level was recently filled here at the ICVAHCS's Safety Office and there was only one (1) qualified applicant, yet this individual does not have my knowledge, experience, expertise or credentials.

Past Commitments Remain Unmet for the [REDACTED] IH/GEMS Program Manager Position:

Back in late 2009, through negotiations with the then [REDACTED] Associate Director, I was promised a 12% wage and benefits increase in exchange for me staying here in my current IH/GEMS Program Manager position at the ICVAHCS. As a short-term solution, I was given retention pay equivalent to a 12% wage increase while my position description was being updated and submitted for re-classification (promotion to GS 13 level). It is my understanding that my position description was eventually updated, but for reasons that I'm not fully aware of, it was never submitted for re-classification. As a result, I never received a promotion or the actual wage and benefits increase that I had been promised. In the meantime, my retention pay continued until September 2014 and was terminated for the following reasons (given to me by the ICVAHCS Human Resources Department):

- 1) The facility has not demonstrated difficulty in recruiting for the position, which is a strong justification for retention incentives.
- 2) The facility has hired (3) additional personnel in the Department to assist Mr. Jones and the entire Safety Department.
- 3) The facility and VISN has minimal funding for any incentives.

It should be noted that none of the reasons given for terminating my retention pay had anything to do with why it had been authorized in the first place. Further, I wasn't the party that suggested retention pay ~ this was suggested as a short-term wage increase solution by the [REDACTED] Human Resources Department, while my position was being re-classified to the GS 13 level. When my retention pay was terminated I met with the current [REDACTED] Associated Director and discussed this situation. He requested that my position description be updated and submitted for re-classified to see if it would grade at the GS 13 level ~ instead it has come back at a lower level (GS 11).

As noted previously, I'm very concerned and puzzled by this downgrading when the fact is that the vast majority (70%) of the facility-level GEMS Coordinators/Program Managers across VHA are at the GS 12 level. Further, if one only looks at those GEMS Coordinator/Program Manager positions that have a job series of 0690: Industrial Hygienist, the percentage with a grade of GS 12 is even higher (80%).

Under the [REDACTED] HR-CCU POSITION CLASSIFICATION EVALUATION STATEMENT, Dated 12/22/2014.

**Factor 1: Knowledge Required by the Position**

Under Factor 1, the [REDACTED] IH/GEMS Program Manager position should be rated at 1-8.

*Justification: The Incumbent is considered to be a technical authority for health, safety and environmental issues, and has been asked to help develop national policies and programs through participation on multiple VHA technical and professional advisory groups. These have included:*

- *VHA Center for Engineering & Occupational Safety and Health (CEOSH) Compliance and Process (CP)-Track Professional Advisory Group (PAG). Initial membership requested by Robert Matthes, Environmental Engineer (retired), VHA CEOSH, back in 2006. This PAG is charged with providing guidance and recommendations associated with enhancements to the CP-Track software system, which is utilized to record and track environmental compliance information associated with all VHA facilities. A specific example of the importance the incumbent's service has been to this advisory group, the incumbent recognized the importance and need that CEOSH obtain a complete data dictionary associated with the CP-Track software system. Once this was obtained CEOSH staff members could analyze the stored data (VHA property) independently and not have to rely upon the software developer/administrator (Construction Engineering Research Laboratory, CERL).*
- *VHA Healthcare Analysis & Information Group (HAIG) Environmental Survey Technical Advisory Group (TAG). Initial membership requested by John G. Staudt, Senior Environmental Engineer (retired), VHA Office of Occupational Safety, Health, and Green Environmental Management Systems (10NA8), back in 2007. This TAG is charged with developing a multi-part national survey intended to analyze the effectiveness of the VHA environmental programs.*

# POSITION DESCRIPTION (Please Read Instructions on the Back)

1. AGENCY POSITION NO.  
**4983-A**

## 2. REASON FOR SUBMISSION

☐ REDESCRIPTION ☐ NEW  
☐ REESTABLISHMENT ☒ OTHER

EXPLANATION (Show any positions replaced)

Review

## 3. SERVICE

☐ HDQTRS ☒ FIELD

## 4. EMPLOYING OFFICE LOCATION

Palo Alto, CA

## 5. DUTY STATION

VAPAHCs

## 6. LABOR STANDARDS ACT

☒ EXEMPT ☐ NONEXEMPT

## 8. FINANCIAL STATEMENTS REQUIRED

☐ EXECUTIVE PERSONNEL ☐ EMPLOYMENT AND FINANCIAL INTERESTS

## 9. SUBJECT TO IA ACTION

☒ YES ☐ NO

## 10. POSITION STATUS

☒ COMPETITIVE  
☐ EXCEPTED (Specify in Remarks)  
☐ SES (Gen) ☐ SES (CR)

## 11. POSITION IS

☐ SUPERVISORY  
☐ MANAGERIAL  
☒ NEITHER

## 12. SENSITIVITY

☒ 1. NON-SENSITIVE ☐ 3. CRITICAL SENSITIVE  
☐ 2. NON-CRITICAL SENSITIVE ☐ 4. SPECIAL SENSITIVE

## 13. COMPETITIVE LEVEL CO

**X01**

## 14. AGENCY USE

15. CLASSIFIED/GRADED BY	OFFICIAL TITLE OF POSITION	PAY PLAN	OCCUPATIONAL CODE	GRADE	INITIALS	DATE
A. U.S. OFFICE OF PERSONNEL MANAGEMENT						
B. DEPARTMENT, AGENCY OR ESTABLISHMENT						
C. SECOND LEVEL REVIEW						
D. FIRST LEVEL REVIEW	<b>Industrial Hygienist (GEMS)</b>	<b>GS</b>	<b>0690</b>	<b>13</b>	<b>AK</b>	<b>10/19/13</b>
E. RECOMMENDED BY SUPERVISOR OR INITIATING OFFICE	<b>Industrial Hygienist (GEMS Program Mgr)</b>	<b>GS</b>	<b>0690</b>	<b>13</b>	<b>KH</b>	<b>08/28/2013</b>

## 16. ORGANIZATIONAL TITLE OF POSITION (if different from official title)

## 17. NAME OF EMPLOYEE (if vacant, specify)

## 18. DEPARTMENT, AGENCY OR ESTABLISHMENT

Department of Veterans Affairs

## C. THIRD SUBDIVISION

Safety and Emergency Management Service

## A. FIRST SUBDIVISION

Veterans Health Administration

## D. FOURTH SUBDIVISION

## B. SECOND SUBDIVISION

VA Palo Alto Health Care System

## E. FIFTH SUBDIVISION

## 19. EMPLOYEE REVIEW - This is an accurate description of the major duties and responsibilities of my position.

## SIGNATURE OF EMPLOYEE (optional)

## 20. SUPERVISORY CERTIFICATION: I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made

with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

## A. TYPED NAME AND TITLE OF IMMEDIATE SUPERVISOR

Kevin D. Ho, Acting Chief, Safety

## B. TYPED NAME AND TITLE OF HIGHER LEVEL SUPERVISOR OR MANAGER (optional)

## SIGNATURE

*[Signature]*

## DATE

**8/28/2013**

## SIGNATURE

## DATE

## 21. CLASSIFICATION/JOB GRADING CERTIFICATION: I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.

## 22. POSITION CLASSIFICATION STANDARDS USED IN CLASSIFYING/GRADING POSITION

**PCS for Industrial Hygienist Series, GS-690, FS-46, 10/80.**

## TYPED NAME AND TITLE OF OFFICIAL TAKING ACTION

**Chief, Classification**

## DATE

**10/17/13**

INFORMATION FOR EMPLOYEES: The standards, and information on their application, are available in the personnel office. The classification of the position may be reviewed and corrected by the agency or the U.S. Office of Personnel Management. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the U.S. Office of Personnel Management.

23. POSITION REVIEW	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE	INITIALS	DATE
A. EMPLOYEE (optional)										
B. SUPERVISOR										
C. CLASSIFIER										

## 24. REMARKS

## 25. DESCRIPTION OF MAJOR DUTIES AND RESPONSIBILITIES (See Attached)



### **Introduction**

The incumbent is a Green Environmental Management Systems (GEMS) Program Manager at one of the following locations: Palo Alto or Menlo Park or Livermore Division. The incumbent directly reports to, and is supervised by the Chief, Safety and Emergency Management Service. At the assigned division the incumbent functions as the primary environmental protection advisor. The incumbent is responsible to interpret and implement GEMS policies and programs in accordance with Veteran's Health Administration (VHA) and VA Palo Alto Health Care System (HCS) policies and other guidance. The incumbent serves as a member of the GEMS Committee, overseeing, coordinating and guiding the implementation of VA GEMS policies across HCS organizational elements at the assigned site.

### **Major Duties and Responsibilities**

The incumbent analyzes GEMS related issues and problems, resulting in findings and conclusions that lead to continual improvement of environmental programs at the HCS. Applies environmental science and technology to demonstrate relationships between the operation of the HCS with human health, ecosystems, environmental media and natural resources. Provides leadership and direction to management, and professional and technical personnel regarding the development and implementation of facility GEMS.

As a GEMS program manager, the incumbent plans, organizes, implements, oversees and provides technical assistance for projects to resolve environmental problems. Assignments include, but are not limited to, wastewater treatment and disposal; safe drinking water; treatment, storage and disposal of hazardous and non-hazardous solid waste; release of hazardous material/spill response; air pollution control; environmental media permitting; toxic substances; and regulatory oversight.

Specific responsibilities related to management of HCS environmental programs are:

- development and implementation of environmental policies, procedures and systems;
- advising management on how environmental policies, procedures and systems will affect operations at the assigned division;
- evaluation, modification and implementation of pollution prevention alternatives to reduce the generation of waste;
- providing technical advice regarding response to environmental emergencies including releases/spills of hazardous material;
- facilitation of the exchange of environmental information to HCS staff, including the development and implementation of training and educational programs related to environmental programs;
- development and presentation of budgetary information related to environmental programs to upper level management;
- management of computer programs and databases to enhance management of environmental programs;



- review of expansion, modifications, closures of existing facilities and infrastructure; and how new construction of structure(s) and infrastructure will affect the environment, provide information that will minimize adverse impacts to human health and the environment and reduce vulnerability;
- measurement of the effectiveness of existing environmental programs and recommendations for additions to environmental program(s) as needed to meet changing environmental requirements;
- development of promotional and educational activities to promote stakeholder awareness of environmental issues;
- provides technical expertise and serves as program manager for the assigned division, with responsibility for providing leadership guidance, technical assistance and evaluation for matters involving industrial hygiene, respiratory protection and environmental technology and compliance, including environmental management systems.
- plans, conducts or directs special studies concerned with occupational health problems which require the development or modification of air sampling equipment or protective devices or the evaluation of control measures for a specific operation, such as response to incidents of hazardous material leakage or spills.
- on the basis of sampling results, observes the operation and knowledge of toxic or hazardous materials, prepares technical reports citing health hazards and sets forth recommended actions for their control or elimination.
- develops Green Environmental Management Systems (GEMS) programs.
- performs work related to the management and operation of VHA healthcare facilities and programs that are needed to: protect the environment, protect human health from environmental pollution and improve air, land and water resources. The work requires knowledge of the organization of the facility, as well as the construction, operation and maintenance of healthcare facilities. Also required is the knowledge of all systems related to controlling pollution and protecting the environment.
- plans and manages industrial hygiene and environmental projects/programs that are related to achieving and maintaining environmental compliance, as well as developing and implementing environmental policy, guidance and procedures related to all environmental media.
- resolves difficult and complex technical, project management and organizational problems using innovative and original approaches. Provides expert technical advice and guidance to senior management officials in the appropriate application of technology to VHA's mission as it relates to environmental issues.

- participates in developing courses of instruction for division personnel, preparing course agendas, making arrangements for demonstrations, drills and giving technical instruction on environmental and industrial hygiene subjects.
- responds to inquiries and provides technical assistance to division personnel.

The incumbent provides advice on overall planning and programming requirements for the operations and maintenance of such programs. Advice rendered:

- pertains to the interpretation and implementation of (and compliance with) environmental management policy directives and applicable procedures and involves subjects directly related to GEMS, pollution and environmental compliance;
- conducts internal annual gap analyses of GEMS in preparation for evaluation by VISN. Reviews implementation of GEMS policy and procedures and reports the status to VISN/VHA CO. Discusses deficiencies and necessary remedial action with appropriate HCS top management and GEMS Committee. Approves preventive and corrective action.

Performs other related duties as assigned.

**Factors:**

**Factor 1 – Knowledge Required By the Position**

Knowledge and skill to develop GEMS programs.

Mastery of advanced concepts, principles and practices of environmental hygiene and compliance.

Knowledge required to research technical publications and apply technical knowledge to healthcare environmental and occupational health issues.

Professional knowledge of industrial hygiene concepts, principles and practices that enables the employee to conduct industrial hygiene studies, to develop sampling or control methods and to provide expert advice to staff in a broad range of industrial hygiene matters, particularly related to GEMS policies, issues and problems.

**Factor 2 – Supervisory Controls**

The Chief Safety and Emergency Management Service is the incumbent's director supervisor. The incumbent is a program manager and works with a high degree of independence. Policy interpretation and implementation is left to the incumbent with only overall review by the supervisor to ensure that the mission and goals of the program(s) are met. The incumbent's completed work is considered technically accurate. Most all technical interaction between the incumbent and the supervisor is collaborative in nature.

### **Factor 3 – Guidelines**

Primary guidelines are published Federal occupational health and safety standards, state and local environmental regulations, Presidential Executive Orders, agency manuals and directives, technical journals and other publications of various professional associations, textbooks, reports on past studies and established practice. There is a preponderance of new guidelines for GEMS programs, and many of these guidelines will be replaced by new ones as policies continue to be developed. Guidelines are frequently inadequate for dealing with complex problems, such as hazards for which standards do not exist or for which established practices are not applicable, such as decontamination or respirators. The employee may be required to apply new sampling techniques or personal protective equipment in controlling a particular hazard.

### **Factor 4 – Complexity**

Assignments involve a full range of GEMS related environmental programs at the assigned division. The employee must identify, evaluate and recommend control measures for any type of health hazard to which workers are exposed. This involves dealing with new materials or processes that require the employee to modify techniques of evaluation and control. In addition, the employee is called on to research technical publications. Surveys involve evaluation of GEMS, including the compliance assurance program elements, and progress on preventive and corrective action plans.

### **Factor 5 – Scope and Effect**

The purpose of the work is to manage the GEMS program for the assigned division. This calls for the investigation and analysis of a variety of environmental industrial and healthcare operations to determine the presence and magnitude of occupational health hazards, and their impact on the environment, and to recommend means for their control. Mastery of advanced concepts, principles and practices of environmental management and compliance is required to cover the scope of responsibilities.

The work affects all operations at the assigned division and impacts on the environmental safety of patients, staff and visitors.

### **Factor 6 – Personal Contacts**

Contacts include the facility Director, safety personnel, industrial hygienists, employees, their supervisors, contractor personnel, industrial hygienists and safety personnel within the agency and within other Federal agencies, as well as agency engineers, chemists, and physicians. Other contacts include regulatory agency personnel such as OSHA, EPA, TJC, state employees and VISN staff.

### **Factor 7 – Purpose of Contacts**

Contacts are to provide expertise on a wide range of environmental industrial hygiene and environmental problems to gain compliance with and support for effective industrial hygiene and environmental protection practices. Contacts with contractors and agency management require skill and tact to overcome technical disagreements or to convince them of the necessity of certain control measures.

#### **Factor 8 – Physical Demands**

The work may require the employee to carry equipment and routinely involves walking, standing, bending, climbing or crawling during inspections or surveys.

#### **Factor 9 – Work Environment**

The employee is subjected to all the risks and discomforts associated with environmental review activities of the agency. This exposure may require the use of protective clothing and equipment, including respirators, hardhats and ear protectors. May encounter exposure to hazardous materials including biological, chemical and radioactive agents.

#### **Other Significant Facts**

##### **Customer Service**

Meets the needs of customers both internally and externally while supporting the VA mission. Consistently communicates and treats customers (investigators, their representatives, visitors, and all VA staff) in a courteous, tactful, and respectful manner. Provides the customer with consistent information according to established policies and procedures. Handles conflicts and problems in dealing with the customer constructively and appropriately.

##### **ADP Security**

Protects printed and electronic files containing sensitive data in accordance with the provision of the Privacy Act of 1974 and other applicable laws, federal regulations, VA statutes and policy, and VHA policy. Protects the data from unauthorized release or from loss, alteration, or unauthorized deletion. Follows applicable regulations and instructions regarding access to computerized files, release of access codes, etc., as set out in the computer access agreement that the employee signs.

##### **Privacy**

In the performance of official duties, the employee has regular access to printed and electronic files containing sensitive data which must be protected under the provisions of the Privacy Act of 1974 and other applicable laws, Federal regulations, Department of Veterans Affairs' statutes and policy, and VHS policy. The employee is responsible for protecting the data from unauthorized regulations and instructions regarding access to computerized files, release of access codes, etc., as set out in a computer access agreement which the employee signs.



POSITION EVALUATION STATEMENT Factor Evaluation System		NATURE OF PROPOSED ACTION Two Year Review		POSITION NO. 4983-A		
CLASSIFICATION TITLE Industrial Hygienist				SCH ED. GS	SERI ES 0690	GRA DE 13
ORGANIZATIONAL TITLE GEMS Program Manager				NO. POSITIONS Multiple		
ORGANIZATION VA Palo Alto Health Care System		Director Office Safety & Emergency Mgmt Section		LOCATION Palo Alto, CA		
EVALUATION FACTORS	POINTS ASSIGNED	STANDARD USED (Give Benchmark No., Factor Level No., etc.)	COMMENTS			
1. KNOWLEDGE REQUIRED BY THE POSITION	1550	FL 1-8	Mastery of the professional concepts, principles, and practices of industrial hygiene that would enable the industrial hygienist to apply experienced judgment and a knowledge of new developments to solve novel or obscure problems.			
2. SUPERVISORY CONTROLS	650	FL 2-5	The supervisor provides administrative direction with assignments in terms of broadly defined missions or functions. The employee has responsibility for planning, designing, and carrying out programs, projects, studies, or other work independently.			
3. GUIDELINES	450	FL 3-4	The guidelines are essentially the same as in Level 3-3. However, the work assignments are such that these guidelines are often inadequate in dealing with the more complex or unusual problems, such as treating hazards for which very little information on toxicity is available. Some situations require the employee to devise new approaches or develop new methods for evaluating or controlling a health hazard.			
4. COMPLEXITY	225	FL 4-4	Assignments cover the full spectrum of occupational health hazards found in all but the most complex industrial environments. Thus, the assigned work activities involve a substantial amount and variety of exposure to chemical, physical, bacteriological and/or radiological hazards. The employee must recognize hazards which are uncommon, evaluate a variety of data, and institute or recommend effective control measures to protect the workers.			
5. SCOPE AND EFFECT	225	FL 5-4	The purpose of the work is to provide expertise as a specialist in the broad practice of industrial hygiene, or in a specialty area of industrial hygiene, by furnishing advisory, planning, or reviewing services on specific problems, projects, or programs, and operating conditions directly affecting worker health and safety.			
6. PERSONAL CONTACTS	60	FL 6-3	In addition to the intra-agency contacts described in Level 6-2, contacts include a variety of officials, managers and professionals of other agencies or outside organizations.			

			Included are contacts with industrial hygiene experts from other agencies, universities, and professional associations; with management representatives in private industry or Federal agencies.
7. PURPOSE OF CONTACTS	120	FL 7-3	The purpose of contacts is to promote good industrial health practices, and to investigate and evaluate working conditions in order to gain compliance with occupational health and safety standards, policies, and regulations. These contacts often involve dealing with skeptical or uncooperative persons, and include serious technical disagreements and difficult labor-management relations.
8. PHYSICAL DEMANDS	20	FL 8-2	The work includes frequent inspections or surveys of industrial workplaces, requiring the employee to carry a considerable amount of equipment, and involve a good deal of walking, standing, bending, and climbing.
9. WORK ENVIRONMENT	20	FL 9-2	During inspections or surveys, there is regular exposure to all of the hazards and discomforts to which the workers are subjected, including a wide range of toxic chemicals, physical stresses, and safety hazards. The employee must use a variety of protective equipment and clothing, such as respirators, ear plugs, gloves, coveralls, hard hats, etc.
SUMMARY	TOTAL POINTS	3320	3155
	GRADE CONVERSION	GS-13	

**Background:** The supervisor submitted this request for Two Year Review.

**Reference:** Position Classification Standard for Industrial Hygiene Series, GS-0690, TS-46 October 1980.

**Series & Title Determination:** The incumbent of this position plans, organizes, implements, oversees and provides technical assistance for projects to resolve environmental problems. Assignments include, but are not limited to, wastewater treatment and disposal; safe drinking water; treatment, storage and disposal of hazardous and non-hazardous solid waste; release of hazardous material/spill response; air pollution control; environmental media permitting; toxic substances; and regulatory oversight. This position meets the referenced series that states includes all classes of positions the duties of which are to advise on, administer, supervise, manage, or perform professional and scientific work in industrial hygiene, including the identification and evaluation of conditions affecting the health and efficiency of employees, or the citizens of the adjacent community, the formulation and recommendation of measures to eliminate or control occupational health hazards, and the promotion of occupational health programs for instructing and motivating managers and employees in the prevention as well as correction of potential health hazards. Appropriate title is Industrial Hygienist.

**Grade Level Determination:** This position has been evaluated using the above reference guide. The total number of points credited by the evaluation above is 3320 which converts to a grade of GS-13 (3155-3600) on the Grade Conversion Table.

**Conclusion:** This position is properly classified as Industrial Hygienist, GS-0690-13.

**FLSA Determination:** The position does meet the criteria for exemption as defined in 5CFR, Part 551 and subsequent guidance and is therefore determined to be FLSA Exempt.

CONCUR	DATE	DATE
		10/17/13
TITLE AND/OR ORGANIZATIONAL LOCATION		TITLE
		Chief, Classification Section