

U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and Grievance Programs



Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604

Job Grading Appeal Decision
Under Section 5346 of Title 5, United States Code

Appellants: [Appellant Name]
[Appellant Name]

Agency classification: Boiler Plant Operator
WG-5402-9

Organization: Department of Veterans Affairs
[Name] Health Care System
Facilities Management Service
[City, State]

OPM decision: **Boiler Plant Operator**
WG-5402-9

OPM decision number: C-5402-09-04

/s/

Ricardo Sims
Operations Supervisor

November 15, 2000

Date

As provided in section S7-8 of the Operating Manual, Federal Wage System, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. There is no right of further appeal. This decision is subject to discretionary review only under conditions specified in section 532.705(f) of title 5, Code of Federal Regulations (address provided in the Introduction to the Position Classification Standards, appendix 4, section H).

Decision sent to:

[appellants' names and address]

[name and address of appellants' servicing
personnel office]

Mr. Ronald E. Cowles
Deputy Assistant Secretary for
Human Resources Management
Department of Veterans Affairs
Washington, DC 20420

Introduction

The appellants are assigned to position 6036-A, Boiler Plant Operator, WG-5402-9, located at the Department of Veterans Affairs, [Name] Health Care System, Facilities Management Service, [City, State]. The appellants agree that their job description accurately reflects their duties and responsibilities, but dispute its downgrading by the VA from Utility Systems Repairer-Operator, WG-4742-10 to Boiler Plant Operator, WG-5402-9.

General Issues

Appellant [Name] stated:

"I wish to appeal the downgrading of my position from Utility Systems Repairer-Operator WG-4742-11 to Utility Systems Repairer-Operator WG-4742-10, as well as my further degradation from Utility Systems Repairer-Operator WG-4742-10 to Boiler Plant Operator WG 5402-9 in Facilities Management Service at the [City] Campus of the [Name] Health Care System, [State], Department of Veterans Affairs.

I have already appealed to the Department of Veterans Affairs regarding the lost of one grade. This appeal resulted in the subsequent loss of a second position."

As a point of clarification, Federal Wage System employees have 15 calendar days to appeal an agency's decision to OPM. The first change from Utility Systems Repairer-Operator, WG-11 to WG-10, occurred on May 28, 1998. Therefore, because of the 15 calendar days requirement, this decision will only address the change from Utility Systems Repairer-Operator WG-10 to Boiler Plant Operator WG-9, which occurred on May 17, 2000.

Job Information

The appellants are two of seven Boiler Plant Operators, WG-9, in their unit. They report to an Operations Supervisor. There are approximately seven trade employees assigned to the unit.

The appellants operate, inspect, and maintain three water-tube boilers, natural gas or diesel fuel oil fired high-pressure steam for heating, sterilizing, cooking, and other hospital needs. The appellants also monitor, adjust, and repair combustion controls, flow meters, fuel handling equipment, steam driven and electric feedwater pumps, chemical metering pumps, and a deaerator and feedwater heater. Other equipment that the appellants operate, maintain, repair, and replace are major steam and water piping assemblies, large and small water pumps, valves, regulators, fans, motors, and other auxiliary boiler equipment. The appellants also operate and maintain other systems; i.e., potable water treatment system, sewers, incinerator, etc.

Analysis and Findings

Pay System Determination

A job is exempt from the General Schedule only if the paramount requirement of the job is knowledge and experience in trades, crafts, or laboring. The primary duty for the appellants' job is to operate and maintain a high pressure steam plant consisting of three water-tube boilers and related auxiliary equipment. The chief requirement for this duty is knowledge and experience in the boiler operation trade. Consequently, the appellants' job is exempt from the General Schedule and falls under the Federal Wage System (FWS).

Code and Title Determination

An FWS job is coded to the occupation that represents the best match between the content of the job and the definitions of the various occupations. Jobs requiring the performance of work in two or more occupations are coded to the occupation that is most important for recruitment, selection, placement, promotion, or reduction-in-force purposes. This is ordinarily the occupation having the highest skill and knowledge requirements, as long as that occupation's duties are regular and recurring.

The appellants state that they perform work in other areas, including Boiler Plant Equipment Mechanic, WG-5309, Water Plant Operator, WG-5409, and Pipe-Fitter, WG-4204. Appellant [Name] stated:

"All other duties that we are expected to perform here, at [City], besides Boiler Plant and Water Plant Operator were not taken into consideration. We are required to operate, repair, and maintain two types of power boilers including steam and hot water, steam distribution systems including: PRV stations, condensed water return systems, water collection systems, water distribution systems and sanitary/storm sewer systems. For the past month we have also been required to perform the duties of the Laundry Equipment Mechanic.

Past and present practice has been, and still is, to assign work orders in the Pipe-Fitter field, to the Utility Systems Repairer-Operators at the [City] campus, on a regular and recurring basis. For the past five years my co-workers and I have had duties assigned exclusively to us, up to the buildings on station, some out lying buildings, and seven miles of twelve inch water piping from the collection system. My co-workers and I have repaired, maintained, and cleaned storm and sanitary sewers with mechanical snakes and high pressure water jets. In 1996, our personnel had an emergency, in which my co-workers and I rerouted the piping for the [Name] Water Collection System. To insure maintenance of these skills, I feel it is necessary to insure that payment for these skills is in place. As for the Boiler Plant Mechanic, we are required to do all of own repairs including the repair of blowers, pumps, refectory work, and machining parts when necessary.

There is currently only one certified Pipe-Fitter at the [City] campus. He is labeled as a Utility Systems Repairer-Operator, due to the down-sizing and cutting back of the Engineering Staff. Technically, the Pipe Shop is non-existent here at [City]. The Seven Utility Systems Repairer-Operators, have been forced to pick up the majority of the Pipe-Fitter's previous duties."

Appellant [Name] added to [Name's] comments:

"The other Pipefitter does those duties, but only within the hospital except in emergency situations, when he may be called out. The regular maintenance and repair of all outside buildings, including the Laundry and residential quarters falls to the Utility Systems Repairer/Operators. This includes auxiliary boilers, water systems, gas lines, and sanitary and storm sewers. Between 30% and 50% of the Repairer/Operator's time is spent on these duties."

Some of the duties the appellants perform in conjunction with their Boiler Plant Operator duties

appear to fall under other occupations, including fixing leaks (Pipefitter), maintaining and repairing water treatment equipment (Water Treatment Plant Operator) and general systems maintenance, repair and troubleshooting (Heating and Boiler Plant Equipment Mechanic). We independently reviewed the job grading standards for all three occupations. However, the primary duties performed by the appellants are Boiler Plant Operator. The job grading standard for the Boiler Plant Operator gives credit and recognition for operational maintenance, treating waste water, conducting chemicals tests, and repairs of limited to moderate complexity.

Therefore, as addressed in the agency's decision dated May 10, 2000, the primary duties involving boiler plant systems are the series and grade-determining duties upon which this decision is rendered.

The *Boiler Plant Operator, WG-5402, Series* job grading standard, dated March 1991, covers work like the appellants' involving the operation and maintenance of single and multi-fuel water or fire tube boilers and associated auxiliary and pollution equipment. The prescribed title for jobs in the 5402 series above the WG-8 level is *Boiler Plant Operator*.

Grade Determination

FWS work is graded based on the regular and recurring duties of the job that involve the highest skill and qualification requirements, even though the duties may not be performed most of the time. Duties performed only in the absence of another employee, to meet emergency workloads, or for development are not considered regular and recurring.

A job is graded as a whole against the level of demands found at differing grades. These demands are expressed in the job grading standard as four factors: 1) skill and knowledge, 2) responsibility, 3) physical effort, and 4) working conditions. No single factor is considered by itself, but only in relation to its impact on the other factors. A job is classified to the grade that best represents the overall demands of the work.

Two factors, physical effort and working conditions, are credited the same at grade level 8 and grade level 10 in the job grading standard. Therefore, this decision addresses the other two factors in-depth, skill and knowledge, and responsibility, and briefly addresses physical effort and working conditions.

Factor 1: Skill and Knowledge

This factor covers the nature and level of skill, knowledge, and mental application required to perform the work.

The appellants' duties entail significantly greater knowledge and skill than the WG-8 grade level. It requires sufficient skill and knowledge to independently operate and maintain the boilers and auxiliary equipment at the plant and to deal with malfunctioning equipment, as well as potentially

dangerous operating conditions, all without the immediate and onsite technical assistance of a higher grade Boiler Plant Operator. In contrast, WG-8 Boiler Plant Workers assist in the operation and maintenance of boilers and auxiliary equipment. Only under the direction of a boiler plant operator do they light off, operate, secure, and maintain power boilers and associated auxiliary and pollution control equipment.

However, the appellants' job does not fully meet the WG-10 grade level where, among other things, Boiler Plant Operators must have sufficient knowledge and skill to maintain efficient combustion levels and ensure compliance with air pollution laws or regulations. The WG-10 level described in the standard is based on specific types of boiler operations necessary for different fuels and skill in controlling the formation of pollutants. WG-10 boiler operation demands more exacting adjustments than WG-8 or 9 operation. It demands skill in adjusting various combustion settings to compensate for the varying qualities of fuels. It requires thorough knowledge of the chemical and physical aspects of sulfur-containing fuels (e.g., oil, coal, and lignite), the chemical reactions involved in combustion, and the relationship between fuel quality and combustion efficiency. Exacting adjustments of manual and automatic controls at the WG-10 level require practical knowledge of environmental law and thorough knowledge of the methods to control combustion and pollutants in flue emissions e.g., by controlling combustion time, stack temperature, and excess air flow. Boilers operated at this level require constant attention and significant knowledge and skill to maintain efficiency while controlling the formation of pollutants. Their operation requires thorough knowledge of pollution control equipment like electrostatic precipitators and flue-gas desulfurization systems to properly adjust, troubleshoot, and maintain the associated equipment and systems.

While the appellants independently operate the boiler plant, the fuels used at the plant, i.e., natural gas and diesel fuel oil, do not require the exacting adjustments associated with the control systems described at the WG-10 grade level. As a result, the full range of skill and knowledge to deal with pollutants and make more demanding combustion requirements is absent from the job. Therefore, a lower level of credit is appropriate.

We evaluate this factor at the WG-9 grade level.

Factor 2: Responsibility

This factor covers the nature and degree of responsibility involved in the work, given its complexity and scope, the difficulty and frequency of judgments and decisions made, the supervisory controls, and the work instructions and technical guides used.

The appellants' work approaches the WG-10 grade level where boiler plant operators receive work assignments from a supervisor or a higher graded operator who is in charge of the facility or work shift. While the appellants are responsible for monitoring and dealing with complete boiler plant operations as at the WG-10 level, the plant which the appellants operate does not have the

added complexity of multi-fuel operation requiring pollution control equipment and the attendant decision-making requirements established at the WG-10 grade level. Also, the appellants have guides and procedures to assist them in their decision-making, and the supervisor is available even when not physically located with them. The appellants do not fully act with the level of independence described at the WG-10 grade level. Therefore, since the appellants' job substantially exceeds the WG-8 grade level where there is a higher graded operator or supervisor available, it does not fully meet the WG-10 grade level, we evaluate this factor at the WG-9 grade level.

Factor 3: Physical Effort

This factor assesses the physical effort involved in the work according to its nature, degree, frequency, and duration of exertion.

Physical effort is the same for WG-8 workers and WG-10 operators alike. Since the standard does not differentiate levels, this is not grade-controlling. We evaluate this factor at the same level credited under knowledge and responsibility.

Factor 4: Working Conditions

This factor covers the usual hazards, physical hardships, and conditions to which workers are exposed. Exposure to unusually severe conditions (hazards, physical hardships, or working conditions) is compensated by environmental pay differentials. Related demands on skill, knowledge, and responsibility are accounted for in the standard.

Working conditions are the same at both the WG-8 and WG-10 grade levels. Since the standard does not differentiate levels, this is not grade-controlling. We evaluate this factor at the same level credited under knowledge and responsibility.

Special Additional Responsibilities

Operator-In-Charge

One additional grade may be credited to plant operator jobs at the full performance level, whether they work alone or with a small group of plant operating employees, when placed in charge of a complete plant. The operator-in-charge typically performs additional duties that are more responsible and require a significantly higher level of skill and knowledge than full performance level operators with a supervisor available to provide specific guidance and assistance.

For example, the operator-in-charge may decide to shut down a malfunctioning boiler and fire up another boiler or attempt to bypass the trouble until the problem can be fixed. Typically, the operator-in-charge has responsibility to determine what work must be done to correct the

malfunction and has the authority to approve overtime or to call in off-duty maintenance personnel.

The appellants' job does not meet the conditions required for additional credit because the supervisor is present during the first shift and available by telephone during the second and third shifts. Additionally, there are extensive policies and procedures to follow for most situations that the lone operator would encounter during the second or third shift. Our factfinding revealed that during the second and third shifts when the supervisor is not physically on station with the operators, he is available to them by telephone. If he cannot be reached, there is a procedure in place on who to call next; i.e., Fire Station if it's an emergency. Otherwise, these second and third shift operators take corrective action. For example, if they conduct a test and find an increase in acid, they add chemicals to reduce the acid level and make a note of it on the record sheet for the next shift and supervisor. Therefore, while the appellants may have additional responsibility when working alone, it is significantly less than that outlined for additional credit under the standard. Because all the conditions associated with being operator-in-charge are not clearly met, the job may not be granted additional grade credit.

Decision

The job equates to the WG-9 level on all four factors. Therefore, it is properly graded as Boiler Plant Operator, WG-5402-9.