

**TESTIMONY OF CHARLES C. MADDOX, ESQ.**  
**INSPECTOR GENERAL**  
**BEFORE THE COMMITTEE ON PUBLIC WORKS AND THE**  
**ENVIRONMENT**  
**JANUARY 17, 2001**

GOOD MORNING CHAIRPERSON SCHWARTZ AND MEMBERS OF THE COMMITTEE. I WELCOME THIS OPPORTUNITY TO SHARE AND DISCUSS WITH YOU THE RESULTS OF OUR INSPECTION OF THE DEPARTMENT OF PUBLIC WORKS, SOLID WASTE MANAGEMENT ADMINISTRATION (WASTE MANAGEMENT). SITTING WITH ME AT THE TABLE ARE ALVIN WRIGHT, ASSISTANT INSPECTOR GENERAL FOR INSPECTIONS AND EVALUATIONS, AND MELVINA COAKLEY, DIRECTOR OF PLANNING AND INSPECTIONS.

I BELIEVE THAT THESE HEARINGS PROVIDE BENEFICIAL FEEDBACK TO AGENCIES AS WELL AS TO THOSE WHO OVERSEE THEM. THEY SERVE AS A PERMANENT AND PUBLIC RECORD OF THE ISSUES WE IDENTIFY, THE RECOMMENDATIONS WE MAKE, AND THE

MILESTONES FOR IMPROVEMENT ESTABLISHED FOR ALL THOSE INVOLVED IN OUR INSPECTION AND AUDIT ACTIVITIES.

DURING THIS HEARING, I WILL PROVIDE BACKGROUND ON THE CONDUCT OF THIS INSPECTION AND HIGHLIGHT THE MOST CRITICAL FINDINGS AND ISSUES FACING WASTE MANAGEMENT. FIRST, HOWEVER, LET ME BRIEFLY EXPLAIN WHAT AN INSPECTION IS. INSPECTIONS ARE BOTH SIMILAR TO AND DIFFERENT FROM AUDITS. AUDITS TYPICALLY TAKE AN INCH-WIDE, MILE-DEEP LOOK AT ORGNIZATIONS, PROGRAMS AND FUNCTIONS, WITH A VIEW TOWARDS IDENTIFYING WHETHER PROGRAM RESULTS ARE BEING ACHIEVED. INSPECTIONS, ON THE OTHER HAND, USUALLY GO A MILE WIDE AND INCHES DEEP, WITH A FOCUS ON OVERALL MANAGEMENT AND OPERATIONS OF AN AGENCY OR PROGRAM. AN OIG INSPECTION REVIEWS, ANALYZES, AND EVALUATES THE MANAGEMENT PROGRAMS AND ACTIVITIES OF A DISTRICT AGENCY.

ULTIMATELY, OUR GOAL IS TO PROVIDE AN INDEPENDENT SOURCE OF INFORMATION SO THAT MANAGERS CAN BETTER MEASURE PERFORMANCE AND ASSESS EFFICIENCY AND EFFECTIVENESS.

COLLECTIVELY, OUR INSPECTION TEAM HAS MANY YEARS OF HANDS-ON EXPERIENCE IN MID- TO SENIOR LEVEL MANAGEMENT. BECAUSE THEY ENJOY EXTENSIVE BACKGROUNDS IN MANAGEMENT ANALYSIS AND HAVE RECEIVED SPECIALIZED ACADEMIC TRAINING FOR THEIR POSITIONS, OUR INSPECTORS ARE ABLE TO PUT THEIR SKILLS, KNOWLEDGE, AND WISDOM TO IMMEDIATE USE.

OUR PRIMARY MESSAGE TODAY IS THAT THE INSPECTION TEAM FOUND SIGNIFICANT DEFICIENCIES IN MOST OPERATIONAL AREAS OF THE SOLID WASTE MANAGEMENT ADMINISTRATION. THESE DEFICIENCIES, WHICH HAVE BEEN DISCUSSED WITH DPW MANAGEMENT, INCLUDE THE FOLLOWING ISSUES AMONG A NUMBER OF OTHERS:

- FAILURE TO COMPLY WITH FEDERAL REGULATIONS

REGARDING THE HEALTH AND SAFETY OF EMPLOYEES;

- SOLID WASTE TRANSFER STATIONS THAT ARE NOT IN

COMPLIANCE WITH DISTRICT REGULATIONS REQUIRING THAT

FACILITIES MAINTAIN AN EFFECTIVE SYSTEM TO CONTROL

RODENTS;

FAILURE TO COMPLY WITH THE REGULATIONS OF THE DISTRICT'S

OFFICE OF OCCUPATIONAL SAFETY AND HEALTH REGARDING

SAFETY AND HEALTH DEFICIENCIES FOUND DURING A NUMBER

OF INSPECTIONS BY THAT OFFICE;

- A LACK OF RELIABLE VEHICLES THAT RESULTS IN AN

INSUFFICIENT NUMBER OF VEHICLES AVAILABLE TO DELIVER

SERVICES TO DISTRICT RESIDENTS; AND

- A LACK OF WRITTEN POLICIES AND PROCEDURES IN NEARLY ALL WASTE MANAGEMENT COMPONENTS.

## **BACKGROUND AND OBJECTIVES**

IN MAY OF 2000, I INCLUDED DPW IN OUR ANNUAL INSPECTION PLAN IN RECOGNITION OF THE MAYOR'S FOCUS ON IMPROVING DELIVERY OF BASIC SERVICES THAT IMPACT CITIZENS THROUGHOUT THE CITY. BECAUSE DPW IS SUCH A LARGE AGENCY, ITS FOUR MAJOR COMPONENTS WILL BE INSPECTED SEPARATELY AND REPORTED ON IN SEPARATE REPORTS. THE SOLID WASTE MANAGEMENT ADMINISTRATION WAS THE FIRST COMPONENT INSPECTED.

OUR INSPECTION OBJECTIVES WERE TO EVALUATE THE EFFECTIVENESS OF SOLID WASTE PROCESSES AS MEASURED AGAINST STANDARDS SET BY DPW AND SOLID WASTE MANAGEMENT; TO DETERMINE COMPLIANCE WITH DISTRICT AND

FEDERAL LAWS AND REGULATIONS; AND TO COMPARE DISTRICT SOLID WASTE OPERATIONS WITH INDUSTRY BEST PRACTICES. WE ALSO EVALUATED THE SUFFICIENCY OF INTERNAL CONTROLS AND RESOURCES IN THE OPERATIONAL AREAS INSPECTED. IN ADDITION, WE EXAMINED THE SUFFICIENCY OF TOOLS AND EQUIPMENT USED BY SOLID WASTE EMPLOYEES TO ACHIEVE THE PRODUCTIVITY AND QUALITY OF WORK REQUIRED TO PROVIDE SATISFACTORY SERVICE TO DISTRICT CITIZENS.

### **HOW THE INSPECTION WAS CONDUCTED**

NEXT, I WOULD LIKE TO EXPLAIN THE APPROACH USED TO CONDUCT THE INSPECTION. THE INSPECTION TEAM ISSUED A SURVEY TO MEASURE EMPLOYEE OPINIONS AND ATTITUDES; WE CONDUCTED 67 INTERVIEWS WITH EMPLOYEES, SUPERVISORS, AND ADMINISTRATORS; WE REVIEWED NUMEROUS DOCUMENTS, REGULATIONS AND LAWS; WE DIRECTLY OBSERVED KEY WORK

PROCESSES; WE INSPECTED SELECTED WORK AREAS AND FACILITIES; AND WE VISITED VARIOUS PUBLIC WORKS DEPARTMENTS IN SURROUNDING COUNTIES.

I AM PLEASED TO SAY THAT THE DIRECTOR OF DPW, SENIOR DPW OFFICIALS, AND SOLID WASTE MANAGEMENT ADMINISTRATORS WERE FULLY COOPERATIVE AND RESPONSIVE DURING ALL PHASES OF THE INSPECTION. IN ADDITION, THEY CONCURRED WITH THE MAJORITY OF OUR FINDINGS AND RECOMMENDATIONS. WHERE THEY DID NOT CONCUR, THEY PROVIDED ACCEPTABLE ALTERNATIVES AND CLEARLY ARTICULATED THEIR INTENT TO TAKE APPROPRIATE CORRECTIVE ACTION.

### **HIGHLIGHTS OF MAJOR FINDINGS**

AS I STATED EARLIER, THE INSPECTION TEAM FOUND SIGNIFICANT DEFICIENCIES IN NEARLY ALL INSPECTED AREAS OF

THE SOLID WASTE MANAGEMENT ADMINISTRATION. THE FOLLOWING, HOWEVER, ARE WHAT I CONSIDER TO BE THE MAJOR REPORT FINDINGS.

**FAILURE TO COMPLY WITH FEDERAL REGULATIONS.** THE TEAM FOUND NUMEROUS VIOLATIONS OF FEDERAL REGULATIONS REGARDING THE HEALTH AND SAFETY OF EMPLOYEES. FOR EXAMPLE, EMPLOYEES WERE NOT BEING ISSUED SUFFICIENT PROTECTIVE AND SAFETY EQUIPMENT ITEMS SUCH AS UNIFORMS, APPROPRIATE EYE AND FACE PROTECTION, PROTECTIVE BOOTS, AND GLOVES. IN ADDITION, THEY WERE NOT BEING DIRECTED TO WEAR THE ITEMS THEY DO HAVE WHILE ON DUTY.

**SOLID WASTE TRANSFER STATIONS NOT IN COMPLIANCE WITH DISTRICT REGULATIONS.** THE TEAM FOUND THAT TRANSFER STATION MANAGERS ARE NOT EFFECTIVE IN KEEPING THE FACILITIES FREE OF RODENTS, AND FACILITY WALLS AND FLOORS

ARE NOT BEING SWEEP, WASHED AND DEODORIZED EACH DAY AS REQUIRED BY DISTRICT REGULATIONS.

**FAILURE TO COMPLY WITH DISTRICT OF COLUMBIA OFFICE OF OCCUPATIONAL SAFETY AND HEALTH (OSH) REGULATIONS.**

THE TEAM FOUND THAT SOLID WASTE MANAGEMENT HAD NOT COMPLIED WITH HEALTH AND SAFETY DEFICIENCIES AS NOTED DURING SEVERAL OSH INSPECTIONS. TWO DEFICIENCIES WERE ESPECIALLY SERIOUS: THE FAILURE TO REPAIR A BROKEN WATER SPRINKLER SYSTEM THAT HAD BEEN CITED AS THE REASON EMPLOYEES WERE EXPERIENCING BREATHING PROBLEMS, AND FAILURE TO REPAIR AN EXPOSED ELECTRICAL PLATE IN A KITCHEN FACILITY.

**LACK OF RELIABLE VEHICLES.** THE TEAM FOUND THAT WASTE MANAGEMENT'S FLEET OF VEHICLES IS OLD, OVERUSED, AND NOT ADEQUATELY MAINTAINED. MANY VEHICLES ARE BEING

USED AS MUCH AS 16- 20 HOURS A DAY, SEVEN DAYS A WEEK. THIS OVERUSE CONTRIBUTES SIGNIFICANTLY TO THE LARGE NUMBER OF BREAKDOWNS EXPERIENCED, WHICH, IN TURN, RESULTS IN AN INSUFFICIENT NUMBER OF VEHICLES AVAILABLE TO DELIVER SERVICES TO DISTRICT RESIDENTS. VEHICLES SENT TO THE FLEET SERVICES GARAGE OFTEN ARE NOT REPAIRED QUICKLY AND ARE KEPT AT THE GARAGE FOR INORDINATE PERIODS OF TIME AWAITING PARTS. FREQUENTLY, VEHICLE PARTS ARE REPAIRED WHEN THEY SHOULD BE REPLACED.

**FACILITIES INFESTED WITH ROACHES AND RODENTS.** THE SOLID WASTE COLLECTION DIVISION FACILITIES, WHICH ARE LOCATED AT 2860 SOUTH CAPITOL STREET AND 1060 BRENTWOOD ROAD, ARE INFESTED WITH PESTS. THE TEAM OBSERVED SEVERAL LARGE RAT HOLES AS WELL AS ROACH INFESTATION THROUGHOUT THE BUILDINGS, THE KITCHEN APPLIANCES, AND THE LOCKERS

USED BY EMPLOYEES.

**LACK OF SECURITY PROCEDURES FOR EMPLOYEES.** MANY EMPLOYEES EXPRESSED CONCERN REGARDING THEIR PERSONAL SAFETY WHILE WORKING ALONE IN SOME DISTRICT NEIGHBORHOODS. SOME EMPLOYEES PROVIDED EXAMPLES OF THREATENING SITUATIONS THEY HAD ENCOUNTERED PERSONALLY DURING THE COURSE OF THE WORKDAY. FOR INSTANCE, ONE EMPLOYEE CITED AN INCIDENT IN WHICH SHE WAS THREATENED BY A CITIZEN WHEN SHE UNKNOWINGLY VACUUMED UP DRUG PARAPHERNALIA STORED IN A TREE BOX. THE TEAM FOUND THAT SOLID WASTE MANAGEMENT HAS NO EMERGENCY CONTACT PROCEDURES IN PLACE FOR SUCH EMPLOYEES TO FOLLOW IN THE EVENT OF AN EMERGENCY.

## **LACK OF STANDARDIZED TRAINING FOR SWEEPER**

**OPERATORS.** TRAINING FOR SWEEPER OPERATORS IS CONDUCTED WITHIN THE STREET AND ALLEY CLEANING DIVISION. THERE IS NO STANDARDIZED TRAINING PROGRAM, AND NO DESIGNATED TRAINERS OR SERIES OF MANEUVERS THAT AN OPERATOR MUST COMPLETE TO BE QUALIFIED TO OPERATE A SWEEP MACHINE ON DISTRICT STREETS. MANY EMPLOYEES STATED THAT THEIR TRAINING TIMES RANGED FROM SEVERAL HOURS TO SEVERAL WEEKS. AS A RESULT, SWEEPER OPERATOR SKILL IS NOT CONSISTENT THROUGHOUT THE DIVISION.

**LACK OF WRITTEN POLICIES AND PROCEDURES.** WASTE MANAGEMENT LACKS WRITTEN POLICIES AND PROCEDURES THROUGHOUT ALL DIVISIONS. ALTHOUGH MANY EMPLOYEES WERE KNOWLEDGEABLE OF THE PROCESSES BY WHICH THEY DO THEIR JOBS, THE INSPECTION TEAM DID NOT FIND ANY WRITTEN POLICIES

AND PROCEDURES DESCRIBING WASTE MANAGEMENT OR DIVISION  
FUNCTIONS AND OPERATIONS.

### **OIG RECOMMENDATIONS**

IN LIGHT OF THESE FINDINGS, WE MADE 103 SPECIFIC  
RECOMMENDATIONS THAT WE BELIEVE CAN ASSIST DPW  
MANAGEMENT IN TAKING CORRECTIVE ACTIONS. THEY INCLUDE:

- STRICT ADHERENCE TO DISTRICT AND FEDERAL REGULATIONS  
REGARDING HEALTH AND SAFETY ISSUES, PARTICULARLY  
PROPER SAFETY EQUIPMENT FOR EMPLOYEES AND GREATER  
EFFORTS AT RODENT CONTROL;
- ACQUISITION OF A SUFFICIENT NUMBER OF HIGH QUALITY,  
RELIABLE WASTE COLLECTION TRUCKS TO ENSURE GOOD  
NEIGHBORHOOD SERVICE;

- CLEAN-UP, REPAIR, AND MAINTENANCE OF FACILITIES USED BY EMPLOYEES WHERE THERE IS RODENT AND ROACH INFESTATION;
- IMPLEMENTATION OF SECURITY AND EMERGENCY CONTACT PROCEDURES FOR EMPLOYEES IN THE FIELD WHO ARE VULNERABLE TO PHYSICALLY THREATENING SITUATIONS;
- IMPLEMENTATION OF STANDARDIZED TRAINING FOR SWEEPER OPERATORS TO ENSURE GREATER UNIFORMITY OF SKILLS; AND
- PRODUCING AND PROMULGATING WRITTEN POLICIES AND PROCEDURES IN ALL WASTE MANAGEMENT DIVISIONS.

### **COMPLIANCE AND FOLLOW-UP**

I WOULD LIKE TO MAKE CLEAR MY STRONG BELIEF THAT AGENCY MANAGERS MUST WORK TO IMPLEMENT RECOMMENDATIONS THEY THEMSELVES ACKNOWLEDGE CAN HELP RECTIFY PROBLEMS. MY RESPONSIBILITY AS INSPECTOR GENERAL

IS TO FOLLOW-UP ON THEIR ACTIONS OR THEIR INACTION, AND TO INFORM THE MAYOR, THIS COUNCIL, AND OTHER STAKEHOLDERS ABOUT AGENCY PROGRESS IN ADDRESSING THE CRITICAL ISSUES RAISED DURING OUR INSPECTIONS AND AUDITS. IN ADDITION, OUR INSPECTION PROCESS, AS IS THE CASE WITH OUR AUDIT PROCESS, INCLUDES CONTINUOUS POST-INSPECTION CONTACT WITH INSPECTED AGENCIES TO MONITOR THEIR PROGRESS IN COMPLYING WITH OUR REPORT RECOMMENDATIONS.

FOR EXAMPLE, A COMPLIANCE TRACKING FORM FOR EACH FINDING AND RECOMMENDATION WAS SENT TO THE DIRECTOR OF DPW ALONG WITH THE REPORT OF INSPECTION. OUR INSPECTIONS DIVISION COMPLIANCE OFFICER WILL COORDINATE WITH DPW ON VERIFYING COMPLIANCE WITH OUR RECOMMENDATIONS OVER AN ESTABLISHED TIME PERIOD. WE WILL ISSUE PERIODIC REPORTS ON COMPLIANCE BY DPW AND OTHER INSPECTED AGENCIES TO THIS

COMMITTEE AND ALL OTHER RECIPIENTS OF OUR ORIGINAL INSPECTION REPORT. BASED ON THE COOPERATION AND RESPONSIVENESS EXHIBITED BY DPW LEADERSHIP THUS FAR, I AM CONFIDENT THAT THE DEPARTMENT CAN TAKE POSITIVE STEPS TOWARD IMPROVING ITS OPERATIONS AND SERVICE DELIVERY TO CITIZENS THROUGHOUT THE CITY.

THIS CONCLUDES MY TESTIMONY ON OUR INSPECTION OF THE SOLID WASTE MANAGEMENT ADMINISTRATION. I THANK YOU FOR PROVIDING ME WITH THE OPPORTUNITY TO ADDRESS THE ISSUES IDENTIFIED IN THE REPORT, AND WE WILL BE PLEASED TO ANSWER ANY SPECIFIC QUESTIONS YOU MAY HAVE.