



Office of Inspector General
Final Memorandum Report

Superfund

Remedial Project Manager Turnover at Superfund Sites

Report No. 2001-M-000015

June 15, 2001

**Inspector General Division
Conducting the Audit:**

**Mid-Atlantic Audit Division
Philadelphia, PA**

Region Covered:

Region III

Program Office Involved:

Hazardous Site Cleanup Division

Contributors:

**Lorraine Fleury (Team Leader)
Jennifer Weidner**




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL
MID-ATLANTIC DIVISION
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029
(215) 814-5800

June 15, 2001

MEMORANDUM

SUBJECT: Final Memorandum Report:
Remedial Project Manager Turnover at Superfund Sites
Report Number 2001-M-000015

FROM: 
Carl A. Jannetti
Divisional Inspector General for Audit
Mid-Atlantic Division (3AI00)

TO: Thomas C. Voltaggio
Acting Region III Administrator (3RA00)

Purpose

Our office received a request from Senator Charles Robb of Virginia asking that we review U.S. Environmental Protection Agency (EPA) Region III's activities at the Abex Superfund site in Portsmouth, Virginia. A prior memorandum, "EPA's Management of the Abex Superfund Site" (2000-S-00006), dated August 31, 2000, dealt with specific questions Senator Robb asked pertaining to the treatment of Washington Park Housing residents located near the Abex site. This additional review addresses the more systemic issues raised in Senator Robb's letter. Specifically, we sought to determine whether EPA Region III has procedures in place that:

- , Mitigate continuity problems caused by turnover of EPA personnel in the Superfund program.
- , Provide that all relevant site data is entered into a single data base and stored in such a way that it is accessible.

This memorandum contains recommendations identified by the Office of Inspector General (OIG). This memorandum represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this memorandum will be made by EPA managers in accordance with established resolution procedures.

Scope and Methodology

In September, 2000, we met with Region III personnel to discuss systemic issues raised in Senator Robb's request. To evaluate the issues, we interviewed EPA Region III Remedial Project Managers (RPMs) and their supervisors in the Hazardous Site Cleanup Division, Community Involvement Coordinators (CICs), Office of Regional Counsel attorneys, and personnel responsible for maintaining the file room. We conducted a review of the CIC's site files and several regional site files through the computerized filing system known as the Superfund Document Management System (SDMS).

The agreed-upon procedures for our review were substantially less in scope than an audit. However, this memorandum was prepared in accordance with generally accepted government auditing standards, Section 2.10. We began our fieldwork on September 18, 2000 and completed it on January 12, 2001.

We issued a draft memorandum to the Acting Regional Administrator on April 2, 2001. EPA submitted its response to us on April 16, 2001. Based on this response, we revised our second recommendation. The Region's comments to the draft memorandum are summarized at the end of this memorandum, as well as our evaluation of the Region's response. A complete copy of the response is included in Attachment 1. Region III and our office agreed that an exit meeting was unnecessary because there were no outstanding issues.

We maintained continuous communication with Region III personnel regarding the content of this review. Although we were unable to contact Senator Robb's staff in December 2000 prior to the Senator's term ending, we considered the Senator's concerns valid and continued with our review. Since the Senator is no longer in office, we are issuing this memorandum report to Region III personnel.

Results of Review

We determined that EPA Region III did not have formal procedures in place to mitigate continuity problems caused by turnover of EPA personnel in the Superfund program. Although the Region's management was adequate and efforts were made to minimize the impact of turnover on site activities, implementation of specific procedures could reduce the impact of turnover. Furthermore, we determined that all relevant site data was stored in a way that it was accessible to EPA personnel and the public, and efforts were underway to enter site data into a single data base.

RPM Turnover

During our Abex review, EPA personnel stated that there was an unusual amount of turnover during the design phase of the Abex Superfund site cleanup. Therefore, during this review of systemic issues, we analyzed 10 additional remedial Superfund sites identified as having frequent RPM turnover. We found that the turnover of three RPMs in 14 months at the Abex site was an exception rather than the norm. Of the 10 sites reviewed, the site with the most turnover had 9 RPMs in 14 years. Litigation and hostility of residents appeared to have caused the high turnover at that site.

Through discussions with EPA personnel and through file reviews, we found the Region did not have formal procedures in place when a site transitioned from one RPM to another. The time spent briefing the incoming RPM varied significantly. Some RPMs conducted extensive exit meetings or site visits, while others spent half of an hour briefing the newly assigned RPM. In the absence of exit meetings or site visits, the incoming RPM would have to rely on existing site files for pertinent information.

We determined that the use of a form would better facilitate transition for RPMs. Based on a form used by Office of Regional Counsel attorneys when a case is transferred internally, we drafted a similar form to be completed by current RPMs to assist in the transfer of a site. We met with numerous RPMs to discuss their experiences with transferring sites, and developed the form in conjunction with the RPMs to best meet their needs. Region III personnel for the most part agreed to complete the Site Information/Checklist Form we developed. The form is included as Attachment 2 to this memorandum.

Overall, the RPMs believed that a site visit was the most valuable source of information for the successful transfer of a site, and exit meetings were also important. Additionally, two CICs mentioned using an exit meeting as a beneficial way to ease the transition of a site. The intent of a form is to serve as a guideline rather than as a mandatory document that must be completely filled out. The form could facilitate the site visits and exit meetings as well as be a valuable resource when a site visit or exit meeting is not held. The form is designed to capture important events that may not be easily identified by a new RPM.

In addition, the weekly salients prepared by RPMs or CICs on significant events at the site could provide a historical perspective of the cleanup effort for a newly assigned RPM. We suggested that the RPMs and CICs save the draft versions of their salients in a computer sub-directory or in a similar organized manner for each of their sites. Draft versions, which are readily available, could provide the factual information about the cleanup. Although there was mixed reaction as to whether saving salients would be helpful, this would not cause any additional work to the RPM or CIC, so we recommend it be done.

Turnover did not appear to have a significant impact on the work at the sites, contrary to what had happened at the Abex site. The 5 CICs assigned to the 10 sites we reviewed stated that, overall, they did not think the sites were negatively affected by the turnover of RPMs. CICs keep the public informed of site activities through fact sheets, public meetings, and internet updates, etc. An attorney from the Office of Regional Counsel also told us that he did not think the sites were negatively affected by turnover, but indicated that use of a form and copies of the salients would be good sources of background for a newly assigned RPM. Furthermore, various site personnel noted that turnover can sometimes be beneficial, since it can result in a new perspective or a beneficial area of expertise being added.

Accessibility to Data

During our review of the Abex site, we found that when an RPM requested site files, a map containing sampling information was inadvertently not included. This omission apparently occurred because the map was an oversized document kept in a separate file, and not specifically requested on the request form. Region III has revised their Superfund file room request form by adding a checkbox at the top of the form for oversized documents or imagery.

The Agency established the SDMS data base specifically for the Superfund program. All of the documents found in the site files are to be loaded into this single data base, which is accessible to EPA personnel and the public. SDMS will indicate whether there are oversized documents associated with a file in the SDMS imaged document. Region III is currently in the process of putting all site files in the SDMS. At the time of the Abex review, Abex was not available on SDMS. EPA personnel indicated 52 priority sites are expected to be loaded into SDMS by the end of September 2001.

Recommendations

We recommend that the Acting Region III Administrator require:

1. Current RPMs for all active Superfund sites in Region III to complete the Site Information/Checklist included in this memorandum as an attachment.
2. Region III RPMs and CICs to retain copies of their draft salients in a separate computer sub-directory or in a similar organized manner.

EPA Response

EPA concurred with our recommendations. The response stated that within 30 days of the publication of this report, the Director of the Hazardous Site Cleanup

Division will be requested to issue a memorandum to all RPMs, CICs, and their respective management instructing them to implement both recommendations. Copies of the Site Information /Checklist shall be forwarded and retained by the Remedial Program Branch Secretaries. In reference to the second recommendation, EPA asked us to add the words “in a similar organized manner.”

OIG Evaluation

We agree that a memorandum instructing the RPMs and CICs to implement our recommendations will improve the transfer of Superfund sites. We added the requested language to our second recommendation.

Action Required

In accordance with EPA Order 2750, you are requested to provide a written response to this memorandum and its recommendations within 90 days of the date of this memorandum. Along with your response, please provide a copy of the memorandum that EPA indicated it will issue to all RPMs, CICs, and management.

We have no objections to the further release of this memorandum report. Should your staff have any questions about this memorandum, please have them contact Lorraine Fleury at (215) 814-5800.

Attachments

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

SUBJECT: Response to Draft Memorandum for Review:
Remedial Project Manager Turnover at Superfund Sites
Assignment Number 2000-001509

FROM: Thomas C. Voltaggio
Acting Region III Administrator (3RA00)

TO: Carl A. Jannetti
Divisional Inspector General for Audit
Mid-Atlantic Division (3AI00)

Thank you for your draft memorandum of April 4, 2001 regarding Remedial Project Manager turnover at Superfund Sites. The information presented appears factual and accurate. I appreciate your evaluation of our current methodology and the two recommendations to further improve our existing system. I concur with the following comments to both of your recommendations which I have provided below for the purpose of clarification.

1. Current RPMs for all active Superfund sites in Region III will complete the Site Information/Checklist included in your draft memorandum as an attachment.
2. Region III RPMs and CICs will retain copies of their draft salients in a separate computer sub-directory.

Within 30 days of receiving your final memorandum report, I shall request Abraham Ferdas, Director of the Hazardous Site Cleanup Division to issue a memorandum to all RPMs, CICs and their respective management instructing them to implement both recommendations. I have also requested both items to be placed on the agenda for the next RPM meeting scheduled for April 18, 2001. This will provide an opportunity to discuss the purpose of the recommendations and receive immediate feedback from a significant percentage of the staff that will receive the memorandum.

Copies of the Site Information/Checklist shall be forwarded also and retained by the Remedial Program Branch Secretaries. The Remedial Program Section Chiefs will insure that the checklist is completed prior to relinquishing an RPM of his/her official duties at each of their Superfund Sites. As discussed in your memorandum, this document will not be considered a "mandatory document that must be completely filled out," but rather a valuable resource to facilitate the transition process.

Attachment 1

While I concur with your second recommendation as well, I request to broaden the language to the following: Region III RPMs and CICs will retain copies of their draft salients in a separate computer sub-directory or in a similar organized manner. This will allow RPMs and CICs the option to use their existing filing system since some staff may elect to retain “hard copies” in a folder at their work station or electronic copies saved in an organized manner, but not in a separate sub-directory. Allowing the staff to organize their draft salients within a system that they are comfortable with, will improve the likelihood of success while achieving the goal of retaining draft salients in an organized manner for future use.

If you or your staff have any questions regarding this matter, please feel free to contact either me or Christopher Corbett, at (215) 814-3220.

SITE INFORMATION/CHECKLIST

INSTRUCTIONS TO RPM: This form is intended to facilitate an exit meeting among key EPA personnel involved at a site. In addition, it is meant to highlight those unusual, yet important, events that may be overlooked by a person unfamiliar with the site. Please note "N/A" where a question or section does not apply.

I. INFORMATION

3. RPM's NAME:

DATE:

4. SITE IDENTIFICATION:

a. Site Name:

b. Site Address (including zip)/Directions to the Site:

c. Number and Description of Operable Units:

d. Location and Organization of Site Files (note if any oversized documents exist):

e. List Key Reference Documents to Obtain Site History:

5. CONTACTS:

a. Regional:

i. How long have you been assigned as an RPM to this site?

ii. Known Previous RPMs:

iii. Known Previous & Current OSCs:

iv. Known Previous & Current CICs:

v. Known Previous & Current Attorneys:

vi. Known Previous & Current Toxicologists:

vii. Known Previous & Current Hydrologists:

b. Non-Regional Personnel - Provide phone #'s and note level of interest:

i. Citizens (any TAG grants?):

ii. Contractor Contacts:

iii. Public Interest Groups:

iv. Congressional:

v. State:

vi. Local:

vii. Media Interest/Contacts:

viii. Other:

6. STATUS OF PRPs:

- a. Are there PRPs owners/operators/generators or transporters and where can a listing be found?

- b. Owners/operators at time of disposal:

7. LEGAL HISTORY OF SITE:

- a. Consent Orders/UAO's:

- b. Consent Decrees/Negotiated Agreements:

II. CHECKLIST

Date of Exit Meeting(s) _____

1. DISCUSSION TOPICS FOR MEETING WITH KEY EPA PERSONNEL:

- ' Site Background: Obtain and attach updated printout from WASTELAN.
- ' Matters Requiring Immediate Attention.
- ' Describe additional work EPA agreed to resulting from public meetings, litigation, or citizen concerns.
- ' Unresolved Issues Due to Litigation.
- ' Future Work Planned.

2. SITE VISIT:

- ' Introduce new RPM to contractors and key contacts.

3. LIST DATES OF FACT SHEETS (If too voluminous, note and list 3 most recent years)

4. ATTACH UPDATED NPL PAD

5. REVIEW RPM's & CIC's VERSION OF SALIENTS

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Audit Followup Coordinator, Office of Solid Waste and Emergency Response
(5103)

Agency Audit Followup Coordinator (2724A)

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(1101A)

EPA Region III Office

Assistant Regional Administrator, Office of Policy and Management (3PM00)

Director, Office of Hazardous Site Cleanup Division (3HS00)

Director, Office of Communications and Government Relations (3CG00)

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