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Environmental Protection
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Office of
Inspector General
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May 1993

Office of Inspector General Semiannual Report to the Congress

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October 1, 1992 through
March 31, 1993



*On the cover: Brown pelicans at their
northernmost rookery, Assawoman Bay, Maryland
(photo by Steve Delaney)*

Foreword



During this semiannual reporting period, the Office of Inspector General has extended its mission of promoting economy, efficiency and effectiveness in the delivery of environmental programs to new areas of the Agency's operations.

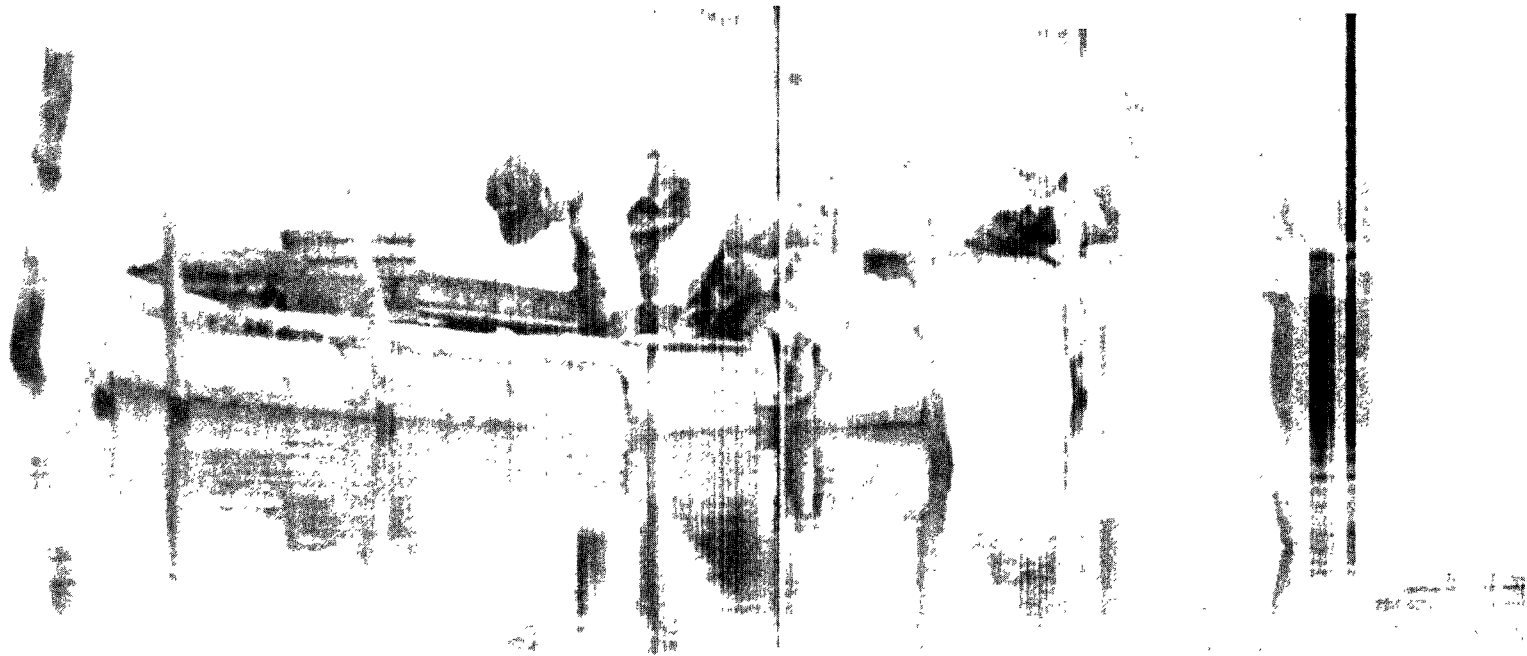
Among the subjects discussed in this report are oil spill cleanups, contract and assistance agreements, drinking water, energy conservation, laboratory management, Superfund cleanups, and accounting systems. These are some of today's most important issues at EPA.

OIG employees are deeply committed to improving the environment and making sure that the scarce resources allocated to this purpose are spent as productively as possible. To help achieve this commitment we have dedicated ourselves to providing Agency managers timely, accurate, and useful products.

We are encouraged by the Agency's actions to correct its contract management problems, and recognize the strength of the Administrator's commitment to lead this effort. We look forward to working with the Administrator and her staff as they deal with this and other difficult issues facing the Agency.

A handwritten signature in black ink that reads "John C. Martin". The signature is written in a cursive, flowing style.

John C. Martin
Inspector General



Contents

Executive Summary	1
EPA High Risk Areas of Significant Concern to the OIG	4
Profile of Activities and Results	6
Establishment of the OIG in EPA—Its Role and Authority	7
Organization and Resources	7
Purpose and Requirements of the Office of Inspector General Semiannual Report	7
 Section 1—Significant Problems, Abuses, and Recommendations	
Summary of Audit Activities and Results	9
Agency Management	10
Construction Grants	13
Superfund Program	16
Special and Early Warning Reviews	18
 Section 2—Report Resolution	
Status Report on Perpetual Inventory of Reports in Resolution Process for the Semiannual Period Ending March 31, 1993	22
Audit Followup	23
Status of Management Decisions on IG Reports	24
Resolution of Significant Reports	25
 Section 3—Prosecutive Actions	
Summary of Investigative Activity	26
Description of Selected Prosecutive and Administrative Actions	27
Civil and Administrative Actions to Recover EPA Funds	29
 Section 4—Fraud Prevention and Resource Management Improvements	
Review of Legislation and Regulations	30
Suspension and Debarment Activities	31
Congressional Testimony by the Inspector General	32
OIG Management Initiatives	32
President's Council on Integrity and Efficiency	33
Committee on Integrity and Management Improvement	33
Hotline Activities	34
Personnel Security Program	34
 Appendices	
Appendix 1—Reports Issued	35
Appendix 2—Reports Without Management Decisions	49

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*Gates of the Arctic National Monument, Brooks Range, Alaska
(photo Courtesy of National Park Service, Department of the Interior)*

Executive Summary

Section 1— Significant Problems, Abuses, and Recommendations

1. Better Oversight Needed of Athens Laboratory's Contracts and Assistance Agreements.

EPA's Environmental Research Laboratory, Athens, Georgia, did not fully comply with applicable laws, regulations, and Agency policies in awarding and administering contracts, cooperative agreements, and interagency agreements. As a result, EPA could not be assured that these resources were effectively and efficiently used (page 10).

2. EPA's Involvement in the Sale of Quality Assurance Materials Potentially Conflicts with Its Regulatory Role.

To provide funds for continuing its Quality Assurance Program, EPA granted five companies exclusive rights to manufacture and sell "EPA Certified" quality assurance materials used by laboratories to calibrate and test equipment for analyzing samples for hazardous chemicals in the environment. As a result, EPA has created an unfair competitive advantage for these companies and could compromise its ability to administer fair and equitable regulations (page 11).

3. Alaska Not Accounting for Safe Drinking Water Grants.

The Alaska Department of Environmental Conservation had not effectively accounted for \$877,500 awarded by EPA to support the State's safe drinking water program or documented accomplishment of grant objectives (page 11).

4. EPA Region 3's Certification Process for Sewage Treatment Plants Unreliable.

EPA Region 3's certification process for wastewater

treatment facilities does not ensure that all permit violations and performance problems are disclosed. (page 12).

5. Improvements Needed in Region 7's Efforts to Identify and Report Internal Control Weaknesses.

Region 7 had not effectively implemented the Federal Managers' Financial Integrity Act. As a result, the Region could not assure the Administrator that it was meeting its mission and protecting its resources (page 12).

6. Nearly \$14 Million of Questioned Costs Claimed for New York City Projects.

New York City claimed \$2,423,359 of ineligible design and construction costs. An additional \$11,530,366 of unsupported costs were also questioned (page 14).

7. Orlando, Florida, Claimed Over \$4 Million of Ineligible Costs.

Orlando, Florida, claimed \$4,392,846 of ineligible engineering and construction costs (page 14).

8. Baltimore, Maryland, Claimed Nearly \$3.9 Million of Questioned Costs.

Baltimore, Maryland, claimed \$3,167,090 of ineligible architectural engineering, construction, administrative, and equipment costs. An additional \$730,476 of unsupported costs were questioned (page 14).

9. Over \$3.1 Million of Ineligible Costs Claimed for Parkersburg, West Virginia, Project.

The Parkersburg, West Virginia, Sanitary Board claimed \$3,143,885 of ineligible legal, architectural engineering, and equipment costs (page 14).

10. Sacramento, California, Claimed Over \$4 Million of Ineligible and Unreasonable Costs.

The Sacramento Regional County Sanitation District, Sacramento, California, claimed \$1,395,800 of ineligible administrative, force account, engineering, construction, and land acquisition costs. An additional \$2,624,778 of unreasonable project costs were questioned (page 15).

11. Grantee's \$9.1 Million Project Claim Questioned Pending Compliance With Discharge Requirements.

The Sausalito-Marin City Sanitary District, Sausalito, California, claimed \$9,082,508 of costs for the design and construction improvements to a wastewater treatment facility that was not consistently meeting waste discharge requirements (page 15).

12. Improvements Needed in Timeliness and Controls Over Responsible Party (RP) Cleanups.

The Agency's use of RPs to clean up Superfund sites has been hampered by numerous problems, including delays in initiating cleanups, lack of aggressive enforcement actions, and ineffective management of contractors (page 16).

13. Continuing Weaknesses in Superfund Accounting and Controls.

Pervasive and persistent problems related to managing accounts receivable and personal property have continued during the 10 years of the Superfund program. In addition, the Agency's Integrated Financial Management System did not provide complete and accurate reports to Superfund management (page 17).

14. Superfund Indirect Cost Rates Not Adequate for Full Recovery of Cleanup Costs.

EPA's fiscal 1987 and 1988 Superfund indirect cost rate calculations inappropriately excluded \$144.2 million and \$225.9 million, respectively, severely reducing the total amounts for recovery from parties responsible for hazardous waste sites (page 17).

15. \$1.6 Million in EPA Training Grants Not Adequately Evaluated.

EPA did not adequately monitor or evaluate the effectiveness of training provided to assist minority contractors in obtaining environmental contracts. In addition, EPA awarded grants without considering alternative lower cost sources (page 18).

16. Better Accounting Needed For Oil Spill Funds.

EPA did not have adequate controls or procedures to properly account for \$18.4 million available in fiscal 1992 from the Oil Spill Liability Trust Fund (page 18).

17. EPA Lacks an Adequate Energy Conservation Program.

EPA had not developed an energy management and conservation program as required by statutes and regulations. As a result, EPA could not adequately determine its energy consumption costs and measure its progress in reducing consumption (page 19).

18. Improper Procurements Circumvented Federal Acquisition Regulation.

The Office of Communications, Education, and Public Affairs officials routinely obtained goods and services without proper authorization or competition as required by the Federal Acquisition Regulation (page 19).

19. EPA'S Administration of the Federal Employees' Compensation Act Needs Improvement.

EPA has not adequately managed claims and payments under the Federal Employees' Compensation Act. As a result, EPA may be paying benefits for individuals who are not EPA employees and may not be encouraging its employees to return to work as soon as possible (page 20).

20. \$21.5 Million Grant to San Diego Should Be Annulled.

San Diego, California, has no need for a land outfall after it canceled plans to construct a related secondary treatment plant (page 21).

21. \$7.2 Million Middletown, California, Project Does Not Meet Effluent Goals.

The Lake County Sanitation District in Middletown, California, claimed \$1.7 million of costs for a leaking storage pond and an unused disposal system for treated effluent which rendered the project in noncompliance with its discharge permit (page 21).

Section 2— Report Resolution

At the beginning of the semiannual period, there were 341 reports for which no management decision had been made. During the first half of fiscal 1993, the Office of Inspector General issued 722 reports and closed 733 reports. At the end of the reporting period, 330 reports remained in the Agency followup system for which no management decision had been made. Of the 330 reports, 146 reports remained in the Agency followup system for which no management decision was made within 6 months of issuance (page 22).

In two followup reviews, the Office of Inspector General found that some problems identified in previous reports

continued (page 23). However, we have nothing to report this period with respect to significant management decisions with which we disagree as required by the 1988 Inspector General Act Amendments.

For the 224 reports closed that required Agency action, EPA management disallowed \$26.8 million of questioned costs for recovery and agreed with our recommendations that \$5.4 million be put to better use (page 22). In addition, cost recoveries in current and prior periods included \$4.6 million in cash collections, and at least \$14.8 million in offsets against billings (page 6).

Section 3— Prosecutive Actions

During this semiannual reporting period, our investigative efforts resulted in 6 convictions and 6 indictments. Also, this semiannual period our investigative work led to \$13.2 million in fines and recoveries (page 26).

In the largest environmental crimes case prosecuted under the Superfund law, an Illinois corporation agreed to pay \$11.6 million for its felony actions at a Pennsylvania site (page 27).

Results of investigations of EPA's contract laboratory program included the sentencing of a testing company and its owner for false claims; development of a community service program by a Louisiana firm in lieu of a \$174,000 fine, which was suspended; and sentencing of 2 supervisors of a New York lab company (page 27).

In other cases, claiming credentials not earned is resulting in weekend jail time for a would-be asbestos removal instructor; and an employee of an EPA contractor was charged with making \$3,600 in personal overseas phone calls at Government expense. Also, an EPA office director at Headquarters was indicted for conspiracy and other crimes,

and another Headquarters employee was sentenced to jail for a false jury duty claim (page 28).

Also, two testing firms agreed to civil settlements with the Government, under which they will pay \$660,000 (page 29).

Section 4— Fraud Prevention and Resources Management

Review of Proposed Legislation and Regulations

During this semiannual period, we reviewed one legislative and 68 regulatory items. The most significant were comments on the Small Business Administration's draft position on the proposed Regulatory Flexibility Amendments Act of 1993; a proposed amendment to EPA Order 1900.1, Use of Contractor Services; and a whistleblower guide developed by the President's Council on Integrity and Efficiency (page 30).

Suspension and Debarment Activities

We completed 37 cases during this reporting period, resulting in 19 debarments, 12 suspensions, and 6 compliance agreements (page 31).

Congressional Testimony by the Inspector General

The Inspector General testified before a subcommittee of the House Committee on Government Operations on elevating EPA to cabinet-level status (page 32).

Committee on Integrity and Management Improvement

The EPA Committee on Integrity and Management Improvement, chaired by the Inspector General, published "A Brief Guide for New Executives," a booklet designed to provide an overview of many of the main

areas on which EPA executives need to focus (page 33).

Hotline Activities

The OIG toll-free Hotline became part of President Clinton's efforts to improve the Government, serving as a collection point for the public's ideas. The Hotline referred 4,587 telephone callers to the appropriate EPA program office, State agency, or other Federal agency for assistance. Thirty-six cases were opened and 31 were closed during the reporting period. Of the closer cases, 8 resulted in environmental, prosecutive, or administrative corrective action (page 34).

Personnel Security Program

During this reporting period, the Personnel Security Staff reviewed 455 investigations (page 34).

Major Laws Administered by EPA

Statute	Provisions
Toxic Substances Control Act	Requires EPA notification of any new chemical prior to its manufacture and authorizes EPA to regulate production, use, or disposal of a chemical.
Federal Insecticide, Fungicide, and Rodenticide Act	Authorizes EPA to register all pesticides, specify the terms and conditions of their use, and remove unreasonably hazardous pesticides from the marketplace.
Federal Food, Drug and Cosmetic Act	Authorizes EPA in cooperation with FDA to establish tolerance levels for pesticide residues on food.
Resource Conservation and Recovery Act	Authorizes EPA to identify hazardous wastes and regulate their generation, transportation, treatment, storage, and disposal.
Comprehensive Environmental Response, Compensation, and Liability Act	Requires EPA to designate hazardous substances that can present substantial danger and authorizes the cleanup of sites contaminated with such substances.
Clean Air Act	Authorizes EPA to set emission standards to limit the release of criteria pollutants and hazardous air pollutants.
Clean Water Act	Requires EPA to establish a list of toxic water pollutants and set standards.
Safe Drinking Water Act	Requires EPA to set drinking water standards to protect public health from hazardous substances.
Marine Protection, Research and Sanctuaries Act	Regulates ocean dumping of toxic contaminants.
Asbestos School Hazard Abatement Act	Authorizes EPA to provide loans and grants to schools with financial need for abatement of severe asbestos hazards.
Asbestos Hazard Emergency Response Act	Requires EPA to establish a comprehensive regulatory framework for controlling asbestos hazards in schools.
Emergency Planning and Community Right-to-Know Act	Requires States to develop programs for responding to hazardous chemical releases and requires industries to report on the presence and release of certain hazardous substances.
Oil Pollution Act of 1990	Makes EPA responsible for oil spill prevention, preparedness, response, and enforcement activities associated with non-transportation-related onshore oil facilities.

EPA High Risk Areas Of Significant Concern To The OIG

This section of our report presents the Office of Inspector General's (OIG) perspective on significant problems which the Agency must address to ensure its programs are conducted in an effective, efficient, and economical manner. The OIG's semiannual report for the period ended September 30, 1992, presented the OIG's perspective on six major areas: Contract Management, Financial Management, Scientific Data Integrity, Information Resources Management, Enforcement, and Audit Followup and Implementation of Corrective Actions to closely correspond with EPA's current priorities and future initiatives. These areas continue to be of concern to the OIG and have captured the attention of Agency management. The Agency included these six areas in its 1992 Federal Managers' Financial Integrity Act assurance letter to the President and Congress as material weaknesses. For this reporting period, the discussion of contract management has been expanded to include grants, cooperative agreements, and interagency agreements.

Management of Extramural Resources

EPA relies extensively on contractors and other outside entities to assist in carrying out its mission to clean up past pollution problems, develop national policy, and set the environmental agenda for the future. These outside groups may be commercial firms that EPA has contracts with to provide goods and services; public organizations, such as universities or State and local organizations that EPA funds to pursue areas of mutual environmental concerns through cooperative agreements; or other agencies of the Federal government that provide assistance through interagency agreements.

EPA is implementing the 40 recommendations of the Standing Committee on Contract Management's June 1992 report. However, not enough time has elapsed for us to evaluate whether the

Agency's actions have corrected the underlying causes of the problems.

Our recent work at the Office of Research and Development and the Office of Communication, Education, and Public Affairs has clearly shown the pervasive nature of resource management problems at EPA. Significant issues identified during these audits are discussed below.

• **Work Outside the Scope of the Contract.** Contractors were performing work outside the scope of their contract at seven EPA laboratories we reviewed. EPA contracts' statements of work often were very broad and not well defined which may encourage questionable work. For example, technical lab contractor personnel were performing handyman duties, such as remodeling offices, painting, and repairing plumbing leaks.

• **Personal Services.** Audits of Office of Research and Development labs found that often contractor employees were used as personal staff, such as secretaries to Federal managers, although prohibited by Federal regulations. There were also repeated instances of EPA officials being involved in the selection and hiring of contractor employees.

• **Potential Conflicts of Interest.** EPA regulations prohibit an Agency employee from taking any action which results in, or creates the reasonable appearance of: (1) giving preferential treatment to an organization or person; (2) losing independence; or (3) undermining the confidence of the public in the integrity of the Government. One of the worst examples of potential conflicts of interest involved an EPA chemist who was the technical monitor of a contractor for which he also worked up to 4 hours per week as a consultant. This outside employment was highly improper and should not have been approved by his supervisor.

• **Procurement Process.** EPA has not competitively awarded certain contracts in

order to retain incumbent contractors. We found, for instance, that one EPA laboratory used the 8(a) small business set-aside program repeatedly to obtain sole source contracts for an incumbent contractor to retain contract employees who had worked at the lab longer than many EPA employees. The EPA laboratory then switched to a competitive procurement, without adequate justification, when the contractor graduated from the 8(a) program. EPA's Office of Communication, Education, and Public Affairs instructed contractors to provide services although there was no purchase order to allow the contractor to be paid. In one case, the contractor was not paid until the unauthorized procurement was ratified 8 months after the work was performed.

• Cooperative and Interagency Agreements.

Audits have shown that mismanagement of extramural resources is not limited to contracts, but also extends to other types of extramural resources. We reported that parts of 11 cooperative agreements that one EPA lab had with various universities only benefitted EPA, violating the purpose of assistance agreements. We also reported that EPA used interagency agreements to improperly obtain travel funding for EPA employees from another Federal agency, and in return provided that agency with travel funds through the same mechanism.

• **Audits of EPA Contracts.** We expect EPA's extensive use of contractors and the corresponding demand for audits will continue to grow. At the end of fiscal 1992, EPA had 1,872 contracts with obligations of \$4.9 billion whose performance periods had expired, but had not been closed out.

Financial Management

The OIG has repeatedly reported that EPA's accounting systems do not provide complete, consistent, reliable and timely data for Agency decision making. While EPA

has devoted considerable time to improving the Agency's overall performance in the area, results have been less than anticipated. Significant issues identified during recent audits of Superfund obligations and disbursements and accounting controls for the Oil Spill Liability Trust Fund are discussed on pages 17 and 18.

In response to the Chief Financial Officers Act and our perceived need, we will continue emphasizing audits in the financial management area. In addition, we will continue to work with the Agency to ensure that an effective organization is established that provides the Chief Financial Officer with the responsibility and authority to correct EPA's longstanding financial management problems.

Scientific Data Integrity

The accuracy and reliability of scientific data have always been crucial to EPA's mission as a regulatory agency because it forms the basis for decisions that affect all major American industries and national policies to prevent hazards and risks to health and safety. However, audits and investigations show that EPA is not always getting the research for which it pays, nor is such research always accurate or objective.

The Federal Insecticide, Fungicide, and Rodenticide Act requires registrants of pesticide products to demonstrate that products do not cause adverse effects to public health and the environment. The registrant either performs the study in-house or contracts with a laboratory. Good Laboratory Practices standards specify the minimum practices and procedures which must be followed in order to ensure the integrity of submitted pesticides data. However we have reported that the Agency lacked assurance that the data submitted by independent laboratories in support of pesticide registrations was accurate and reliable.

Under the Contract Laboratory Program (CLP), independent laboratories test

samples from Superfund sites. Investigations have disclosed fraudulent analyses, falsified data, uncalibrated equipment, and backdated analyses which could call into question cleanup decisions and hamper the recovery of EPA's cleanup costs from responsible parties. Our audits have found that the controls over the Superfund CLP quality assurance/quality control program at Environmental Monitoring Systems Laboratory, Las Vegas, Nevada, were not complete or fully effective for evaluating contract laboratories' performance and that EPA used laboratories with poor performance histories to analyze samples while laboratories with superior performance histories were not used to their capacity.

Information Resources Management (IRM)

IRM is critical to the success of all program activities. Despite extensive criticism over the last 12 years, EPA's IRM program is still hampered by many problems, including significant cost overruns and delays in developing and implementing information systems; material data quality deficiencies; development of duplicate information systems; failure to economically manage mainframe storage devices; exposure of the Agency's most sensitive information systems to access by unethical users; and lack of Agency assurance that ADP support services contracts are being implemented effectively, efficiently, and at the lowest cost to the Government. Two recent audits discussing these significant IRM problems are summarized below.

• **Computer Systems Integrity.** EPA had not implemented certain fundamental management practices in its IRM program. A serious absence of top management central direction and control and the decentralized nature of Agency operations have made it extremely difficult to effectively manage IRM activities.

• **Software Integrity.** EPA user and contractor access to

highly sensitive payroll, contractor payment, and other sensitive financial files was not adequately controlled. Knowledgeable users could access systems on the mainframe and view, modify, or destroy information, programs, or other important computer resources with little fear of detection.

Enforcement

During the past 2 years, OIG audits of EPA's water, pesticide, hazardous materials, and Superfund programs have reported continuing instances of ineffective Federal and State enforcement. Although EPA management has worked to improve EPA's enforcement program in response to or concurrent with our audit efforts, more still needs to be done. For example, in our capping report on EPA's management of Superfund cleanups performed by responsible parties, we noted that untimeliness was a pervasive condition. In addition, EPA did not aggressively use its penalty authority against noncompliers, but preferred to stress cooperation in getting responsible parties to clean up hazardous waste sites. Contractors used to monitor responsible party cleanups were given too much latitude without sufficient oversight which led to delays, inefficiencies, and additional expenditures. We also reported the lack of documentation in all phases of the Superfund enforcement process (page 16).

EPA has initiated actions to speed up the Superfund cleanup process, drafted guidance on proper use of penalty authorities, improved contractor monitoring, and recognized the need for improved documentation. We will continue to assist EPA in assessing its success in Superfund enforcement and enforcement activities in other program areas.

Audit Followup and Implementation of Corrective Actions

Since 1988 we have been assessing the effectiveness of

EPA's audit followup responsibilities. EPA has elevated the issue of audit followup to the highest management levels and appears committed to making improvements. However, we are still reporting problems. In a recent followup audit on EPA's Suspended and Canceled Pesticide Program, we reported that the Office of Prevention, Pesticides and Toxic Substances did not use the established Management Audit Tracking System to monitor corrective action plans for audit recommendations. This was reportedly due to problems interfacing with the Agency's main computers at the Washington Information Center and Research Triangle Park (see page 23).

The Office of Prevention, Pesticides and Toxic Substances is working to remedy this problem and expects to review the accuracy of all data on corrective actions taken in response to audits by the summer of 1993. Likewise, EPA is working with the OIG to strengthen audit followup throughout the Agency. A Quality Action Team made up of OIG and Agency representatives is updating the EPA Order on "Management of EPA Audit Reports and Followup Actions." The goal is to identify procedural changes that will result in a timely, fair audit resolution process.

Profile Of Activities And Results

Environmental Protection Agency Office of Inspector General

October 1, 1992, to
March 31, 1993

October 1, 1992, to
March 31, 1993

Audit Operations

OIG Managed Reviews:

- Reviews Performed by EPA, Independent Public Accountants and State Auditors	
- Questioned Costs (Ineligible, Unsupported, and Unnecessary/Unreasonable)	
- Total	\$170.3 Million
- Federal Share *	\$127.8 Million
- Recommended Efficiencies (Funds be Put to Better Use)	
- Total Efficiencies*	\$23.4 Million
- Federal Share Efficiencies*	\$12.9 Million
- Cost Disallowed to be Recovered	
- Federal Share (costs which EPA management agrees are unallowable and is committed to recover or offset against future payments)	\$26.3 Million
- Cost Disallowed as Cost Efficiency	
- Federal Share (funds made available by EPA management's commitment to implement recommendations in OIG performance and preaward audits)	\$3.3 Million

Other Reviews:

- Reviews Performed by another Federal Agency or Single Audit Act Auditors	
- Questioned Costs	
- Total	\$5.1 Million
- Federal Share *	\$4.5 Million
- Recommended Efficiencies	
- Total Efficiencies*	\$3.4 Million
- Federal Share Efficiencies*	\$3.4 Million
- Cost Disallowed to be Recovered	
- Federal Share	\$0.7 Million
- Cost Disallowed as Cost Efficiency	
- Federal Share	\$2.1 Million

Agency Recoveries:

- Recoveries from Audit Resolutions of Current and Prior Periods (cash collections or offsets to future payments)**	\$19.4 Million
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Reports Issued:

- OIG Managed Reviews:	
- EPA Reviews Performed by the OIG	72
- EPA Reviews Performed by Independent Public Accountants and State Auditors	4
- Other Reviews:	
- Single Audit Act Reviews and EPA Reviews Performed by another Federal Agency	60

Total Reports Issued 72

Reports Resolved (agreement by Agency officials to take satisfactory corrective action)*** 22

Investigative Operations

- Fines and Recoveries (including civil)	\$13.2 Million
- Investigations Opened	12
- Investigations Closed	13
- Indictments of Persons or Firms	1
- Convictions of Persons or Firms	1
- Administrative Actions Against EPA Employees	11

Fraud Detection and Prevention Operations

- Debarments, Suspensions and Settlement Agreements	3
- Hotline Cases Opened	3
- Hotline Cases Processed and Closed	3
- Personnel Security Investigations Adjudicated	45

* Questioned Cost and Recommended Efficiencies are subject to change pending further review in the audit resolution process.

** Information on recoveries from audit resolution is provided from the EPA Financial Management Division and is unaudited.

*** Reports resolved are subject to change pending further review.

Establishment Of The OIG In EPA—Its Role And Authority

The Inspector General Act of 1978 (Public Law 95-452), as amended, created Offices of Inspector General to consolidate existing investigative and audit resources in independent organizations headed by Inspectors General.

EPA established its Office of Inspector General (OIG) in January 1980. As an agency with a massive public works budget, EPA is vulnerable to various kinds of financial abuses. The OIG's role is to review EPA's financial transactions, program operations, contracts, and administrative activities; investigate allegations or evidence of possible criminal and civil violations; and promote economic, efficient, and effective Agency operations. The OIG is also responsible for reviewing EPA regulations and legislation.

The EPA Inspector General reports directly to the Administrator and the Congress and has the authority to:

- Initiate and carry out independent and objective audits and investigations,
- Issue subpoenas for evidence and information,
- Obtain access to any materials in the Agency,
- Report serious or flagrant problems to Congress,
- Select and appoint OIG employees,
- Fill Senior Executive Service positions,
- Administer oaths, and
- Enter into contracts.

The Inspector General is appointed by, and can be removed only by, the President. This independence protects the OIG from interference by Agency management and allows it to function as the Agency's fiscal and operational watchdog.

Organization and Resources

The Office of Inspector General functions through three major offices, each headed by an Assistant Inspector General: Office of Audit, Office of Investigations, and Office of Management. Nationally, there are eight Divisional Inspectors General for Audit and seven Divisional Inspectors General for Investigations who direct staffs of auditors and investigators and who report to the appropriate Assistant Inspector General in Headquarters.

For fiscal 1993, the Agency was appropriated \$6,892,400,000 and authorized 17,917 full time equivalent (FTE) positions to conduct the environmental programs authorized by Congress to restore and protect the environment. As a separate appropriation account, the Office of Inspector General (OIG) received \$42.8 million to carry out the provisions of the Inspector General Act of 1978, as amended. Nearly \$15 million of the OIG's appropriation was derived from the Hazardous Substance Superfund trust fund and \$610,000 was derived from the Leaking Underground Storage Tank trust fund. The OIG has an approved staffing level of 456 FTE positions. The funding and FTE available to the OIG represent 0.6 percent and 2.5 percent, respectively, of the Agency's totals.

Purpose and Requirements of the Office of the Inspector General Semiannual Report

The Inspector General Act of 1978 (Public Law 95-452), as amended, requires the Inspector General to keep the Administrator and Congress fully and currently informed of problems and deficiencies in the Agency's operations and to

recommend corrective action. The IG Act further specifies that semiannual reports will be provided to the Administrator by each April 30 and October 31, and to Congress 30 days later. The Administrator may transmit comments to Congress along with the report, but may not change any part of it.

The specific reporting requirements prescribed in the Inspector General Act of 1978, as amended, are listed below.

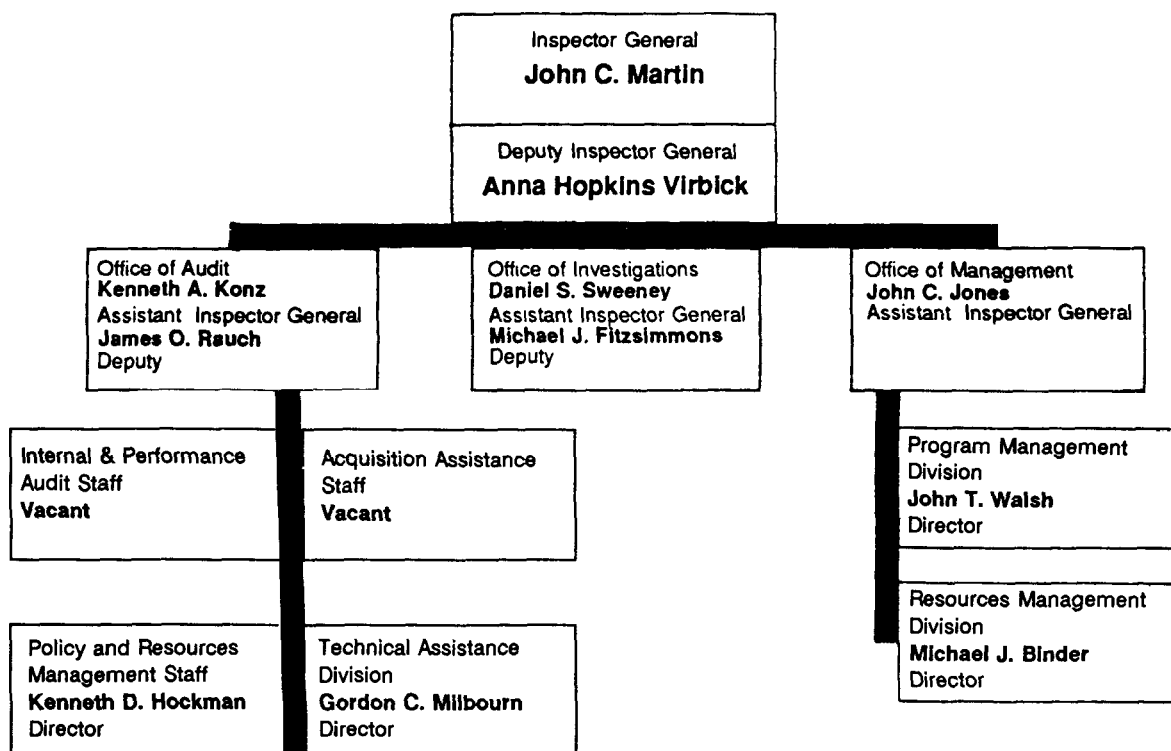
Source	Section/Page	
Inspector General Act, as amended.		
Section 4(a)(2), Review of Legislation and Regulations	4	30
Section 5(a)(1), Significant Problems, Abuses, and Deficiencies	1	9
Section 5(a)(2), Recommendations with Respect to Significant Problems, Abuses, and Deficiencies	1	9
Section 5(a)(3), Prior Significant Recommendations on Which Corrective Action Has Not Been Completed	Appendix 2	49
Section 5(a)(4), Matters Referred to Prosecutive Authorities	3	26
Section 5(a)(5), Summary of Instances Where Information Was Refused	*	-
Section 5(a)(6), List of Audit Reports	Appendix 1	35
Section 5(a)(7), Summary of Significant Reports	1	9
Section 5(a)(8), Statistical Table 1-Reports With Questioned Costs	2	24
Section 5(a)(9), Statistical Table 2-Reports With Recommendations That Funds Be Put To Better Use	2	24
Section 5(a)(10), Summary of Previous Audit Reports Without Management Decisions	Appendix 2	49
Section 5(a)(11), Description and Explanation of Revised Management Decisions	Appendix 2	49
Section 5(a)(12), Management Decisions with Which the Inspector General Is in Disagreement	**	-

* There were no instances where information or assistance requested by the Inspector General was refused during this reporting period. Accordingly, we have nothing to report under section 5(a)(5) of the Inspector General Act of 1978, as amended.

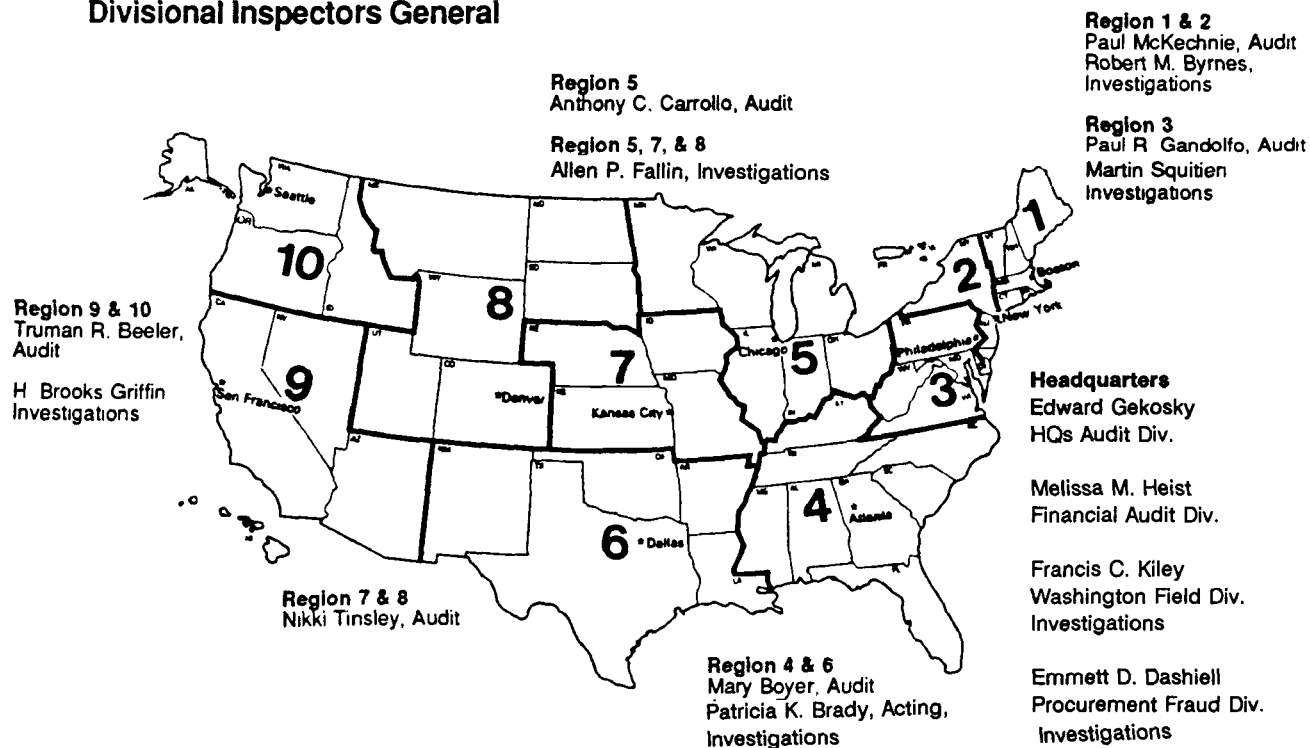
** There were no instances of management decisions with which the Inspector General was in disagreement.

Office of Inspector General – Who's Who

Headquarters



Divisional Inspectors General

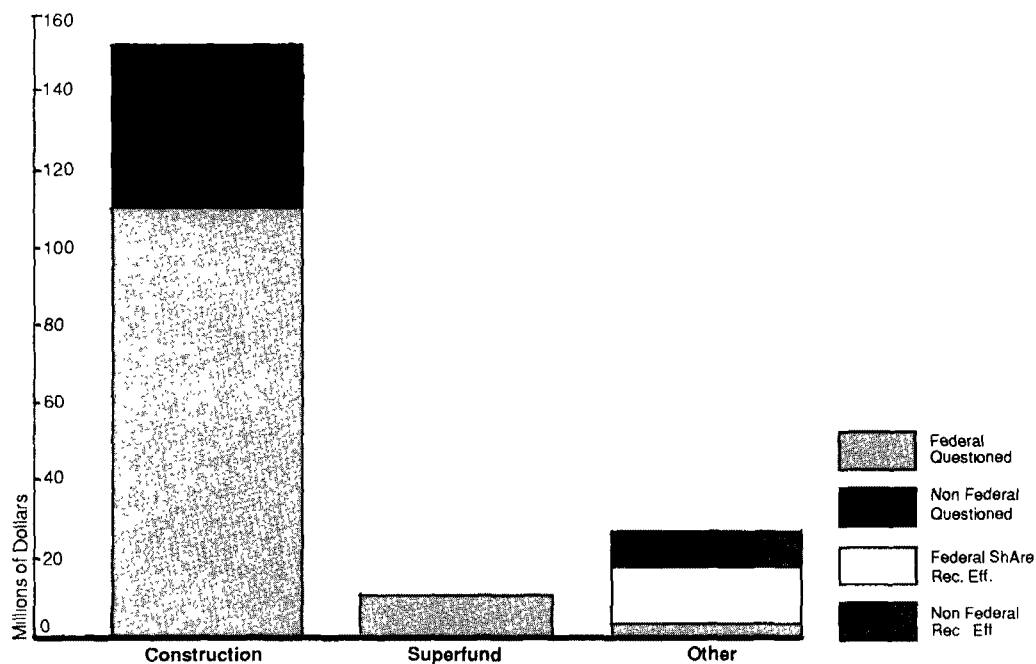


Section 1—Significant Problems, Abuses, And Recommendations

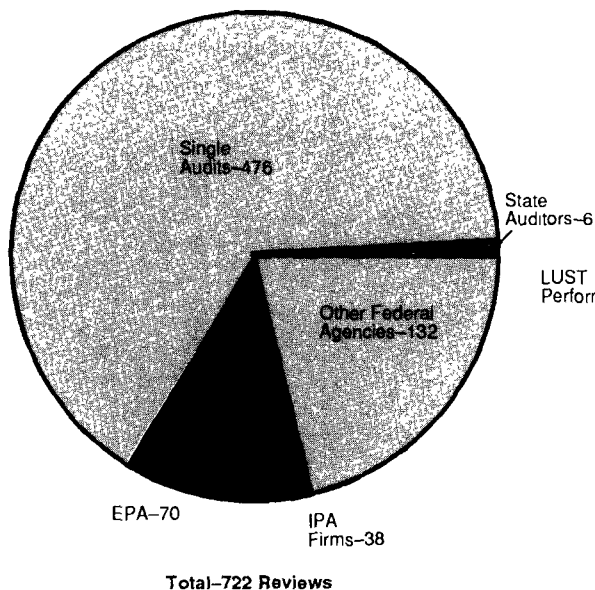
As required by sections 5(a)(1) and (2) of the Inspector General Act of 1978, as amended, this section identifies significant problems, abuses, and deficiencies relating to the Agency's programs and operations along with recommendations for the current period. The findings described in this section resulted from audits and reviews performed by or for the Office of Audit and reviews conducted by the Office of Investigations. Because these represent some of our most significant findings, they should not be considered representative of the overall adequacy of EPA management. Audit findings are open to further review but are the final position of the Office of Inspector General. This section is divided into five areas: Summary of Audit Activities and Results, Agency Management, Construction Grants, Superfund, and Special and Early Warning Reviews.

Summary Of Audit Activities And Results

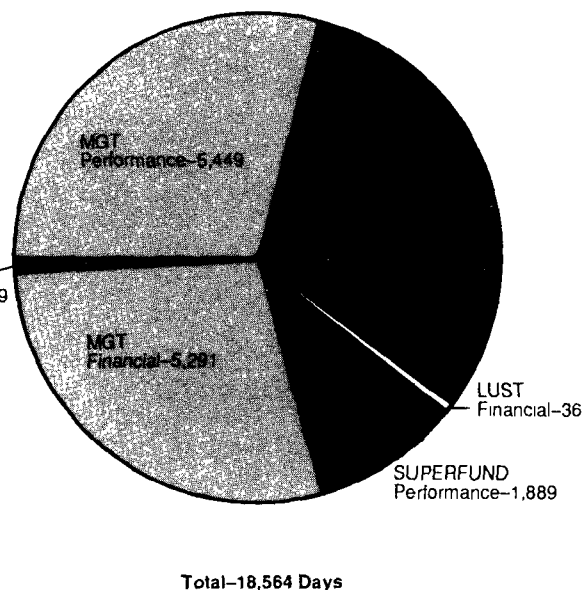
Questioned Costs And Recommended Efficiencies By Type Of Assignment



Source Of Reviews



Areas Of Effort By Staff Days



Agency Management

The Inspector General Act requires the OIG to initiate reviews and other activities to promote economy and efficiency and to detect and prevent fraud, waste, and mismanagement in EPA programs and operations. Internal and management audits and reviews are conducted to accomplish these objectives largely by evaluating the economy, efficiency, and effectiveness of operations.

The following are the most significant internal and management audit and review findings and recommendations.

Better Oversight Needed of Athens Laboratory's Contracts and Assistance Agreements

Problem

EPA's Environmental Research Laboratory (ERL), Athens, Georgia, did not fully comply with applicable laws, regulations, and Agency policies in awarding and administering contracts, cooperative agreements (CA), and interagency agreements (IAG). As a result, EPA could not be assured that these resources were effectively and efficiently used.

We Found That

Between 1986 and 1992, the Office of Research and Development and ERL became highly dependent on contracts, CAs, and IAGs to perform critical laboratory research and support operations. Our review covered 20 contracts, CAs, and IAGs with total maximum values of \$44 million. There were a number of questionable actions by ERL in the award, use, and funding of contracts, CAs, and IAGs. More specifically ERL improperly used extramural resources by:

- Awarding repetitive sole-source Small Business Act, section 8(a) contracts over 7 years to retain long-term on-site contractors and contractor staff. In one case when the contractor became too large for an 8(a) award, the laboratory removed the requirement from the program without justification to allow the incumbent contractor to compete for the new award. The laboratory then established ranking factors which assigned the most value to experience and key personnel, favoring the incumbent and permitting it to easily win the \$16.8 million award.

- Splitting and underestimating contract requirements to avoid the \$3 million competition threshold established for sole-source contracts under the 8(a) set-aside program. For example, ERL split its on-site support contract into an off-site and on-site 8(a) sole-source procurement. However, the off-site work was actually performed near the site with the same site manager and statement of work.

- Supplementing ERL's in-house staff with contractor personnel who performed inherently governmental functions, such as quality assurance and health and safety activities.

- Improperly awarding CAs and IAGs, rather than contracts, to obtain services for the direct benefit of ERL research projects, including a \$5.2 million CA awarded to the University of Georgia (UGA). At least 14 UGA employees worked on-site in 1992 under the CA to support ERL scientists in their research or provided administrative support to ERL staff. Also, there were potential conflict-of-interest situations in the award of 9 of the 11 CAs included in our sample.

ERL's procurement problems were due largely to inadequate controls over extramural resources at the laboratory, management's emphasis on mission accomplishment by any means, and lack of oversight of ERL operations by EPA Headquarters.

We Recommended That

The Acting Assistant Administrator for Research and Development:

- In collaboration with the Grants Administration Division and the Comptroller, issue additional guidance to laboratories regarding competitive awards of extramural agreements and the proper use of research and development funds under assistance agreements.

- Strengthen Headquarters oversight and control of laboratories' management of extramural resources to include periodic on-site reviews of laboratory operations performed jointly with other appropriate Headquarters offices.

- Ensure that ERL properly implements FMFIA requirements and establishes effective internal controls over all critical phases of laboratory operations.

The Assistant Administrator for Administration and Resources Management:



EPA's lab in Athens, Georgia
(OIG photo by Southern Audit Division staff).

- Strengthen and streamline the contracting process to ensure that proposals are thoroughly reviewed, questionable actions are quickly and properly resolved, and unnecessary administrative burden on program offices is reduced.
- Provide definitive guidance to project officers and program managers on the award, administration, and appropriate uses of assistance agreements and contracts.

What Action Was Taken

The final audit report (3100156) was issued to the Acting Assistant Administrator for Research and Development and the Assistant Administrator for Administration and Resources Management on March 31, 1993. In responding to the draft report, the Agency generally agreed with our recommendations and provided substantive planned or already initiated actions to correct the identified weaknesses. A response to the final report is due by June 29, 1993.

EPA's Involvement in the Sale of Quality Assurance Materials Potentially Conflicts with Its Regulatory Role

Problem

To provide funds for continuing its Quality Assurance Program, EPA granted five companies exclusive rights to manufacture and sell "EPA Certified" quality assurance (QA) materials used by laboratories to calibrate and test equipment for analyzing samples for hazardous chemicals in the environment. As a result, EPA has created an unfair competitive advantage for these companies and could compromise its ability to administer fair and equitable regulations.

Background

The Federal Technology Transfer Act (FTTA) allows Government-operated laboratories to enter into Cooperative Research and Development Agreements (CRADA) with other Federal agencies and private industry to encourage the development and transfer of technology to the private sector, thereby improving the nation's economic, environmental, and social well-being. The FTFA permits Federal laboratories and employees to collect royalties from patents and licensing agreements for Government-owned inventions.

In the early 1970s, EPA promulgated new regulations requiring testing for hazardous chemicals in the environment. In order to test for the various regulated chemicals, laboratories needed calibration standards to adjust equipment settings and quality control samples to periodically check the operations of their equipment. At the time, many of the QA materials were not available for many of the regulated chemicals. As a result, under its QA Program, the Environmental Monitoring Systems Laboratory in Cincinnati, Ohio (EMSL-Cin) began to develop, manufacture, and distribute these materials free to qualified users. Eventually, these materials were largely produced, stored, and distributed by EPA contractors.

We Found That

In the mid 1980s, due to a combination of increased costs and budget reductions, EMSL-Cin began looking for ways to continue funding its QA program. When the FTFA was enacted in 1986, EMSL-Cin saw an opportunity to obtain the needed funds. In 1991, EMSL-Cin entered into five CRADAs to develop, manufacture, and sell QA materials needed to calibrate and test instruments used by laboratories to analyze samples for regulated hazardous chemicals. The five

companies were required to advertise their products as "EPA Certified." EMSL-Cin also made available for sale about 750,000 ampuls of material valued at over \$26 million to the five CRADA companies. EMSL-Cin would receive a percentage of the companies' sales of the transferred inventory and any new materials manufactured by the CRADA companies.

By granting the five CRADA companies exclusive rights to sell the existing inventory and any new material, EPA created conditions for a Government-controlled oligopoly. Although other firms manufacture similar materials, only the five companies can advertise the products they manufacture as "EPA Certified." As is typical of an oligopoly, QA material prices increased substantially from 1990 to 1991, the year the CRADAs were established. For example, the price for the QA material for chlordane increased from \$.20 to \$1.40.

By requiring the CRADA companies to market their products as "EPA Certified," the Agency created the appearance of a conflict of interest because it may have to choose between fair and equitable regulations and a desire to increase revenue through sales of QA materials. As a regulator, the Government must not be biased towards the community it is regulating or provide a competitive advantage to commercial enterprises.

Although EMSL-Cin officials said that the CRADAs were established under the FTFA, they are an inappropriate use of the Act. No new technology was transferred to the private sector (only QA materials from EPA's inventory). Any research conducted involved developing and marketing QA materials and not the development of new technology. Also, by making available marketable QA materials to the CRADA companies, EMSL-Cin provided a source of funds to the companies, which is not permitted under the FTFA.

We Recommended That

To ensure that the Agency no longer competes with private industry, the Acting Assistant Administrator for Research and Development instruct the Director, EMSL-Cin, to immediately cancel the laboratory's participation in these five CRADAs, recover any inventory which had been transferred to the five companies which has not yet been sold, and determine the proper method to dispose of those QA materials not needed to meet existing obligations, such as under memorandums of understanding with other agencies.

What Action was Taken

The final audit report (3100153) was issued to the Acting Assistant Administrator for Research and Development on March 31, 1993. A response to the final report is due by June 29, 1993. In responding to the draft report, the Acting Assistant Administrator did not agree with our recommendations and proposed several actions which the Office of Research and Development would take to determine whether CRADAs are the best way to continue the reference material program. However, until ORD completes its analyses, we continue to believe that the five CRADAs are inappropriate.

Alaska Not Accounting for Safe Drinking Water Grants

Problem

The Alaska Department of Environmental Conservation (ADEC) had not effectively accounted for \$877,500 awarded by EPA to support the State's safe drinking water (SDW) program or documented accomplishment of grant objectives.

Background

EPA provides direct financial assistance to any State that assumes primary enforcement responsibility for its public drinking water program, provided that its drinking water standards are not lower than national standards and that it establishes adequate reporting and enforcement procedures.

We Found That

ADEC's fiscal and accounting procedures were inadequate to maintain effective control and accountability of the \$877,500 in 1991 SDW grant funds received from EPA. Rather than charging actual costs incurred in administering its SDW program, ADEC charged costs to the grant based on budget allocations. In addition, ADEC did not have written procedures for charging costs to the grant nor did it have a cost allocation plan for distributing some joint administrative costs.

Personnel costs were the major portion of the claimed grant expenditures, but it was impossible to trace employees charged to the grant because of incompatibilities between Alaska's payroll system and accounting system used to record grant expenditures. Further, ADEC charged costs for non-drinking water activities to the grant and lacked documentation for other expenditures. For example, from our randomly selected sample of 48 non-personnel transactions, only 12 were adequately documented as grant-related expenditures--all involving travel. Also, ADEC either did not fully or timely complete six reviewed work plan objectives. For example, none of the State regional offices consistently reported the number of engineering plans for public drinking water systems which were received and reviewed.

We Recommended That

The Regional Administrator, Region 10, withhold additional

SDW grant awards until ADEC:

- Establishes written policies and procedures for charging costs to the grant based upon actual costs incurred; and
- Ensures the State/EPA Agreement work plan tasks are performed and reported on consistently and documentation is submitted to support reported activities.

What Action Was Taken

The final audit report (3300012) was issued to the Regional Administrator, Region 10, on February 10, 1993. A final response is due from the Regional Administrator by May 11, 1993. ADEC agreed with many of the conditions described in our draft report and advised us of corrective actions taken or planned.

EPA Region 3's Certification Process for Sewage Treatment Plants Unreliable

Problem

EPA Region 3's certification process for wastewater treatment facilities does not ensure that all permit violations and performance problems are disclosed.

Background

In January 1983, EPA implemented the Water Management Division (WMD) Certification process. The OIG believes that a positive certification indicates that a facility is operating properly and is complying with its National Pollutant Discharge Elimination System (NPDES) permit. However, the Office of Water and Region 3 WMD contend that a positive certification means only that the plant's flow is at least 75 percent of the planned initial flow, Federal funds were not used for unnecessary or

unreasonable aesthetic features, and there were no abandoned, unused or inoperable facilities. Certifications were intended to provide the OIG information, other than a project's dollar size, for deciding (1) whether to initiate an audit and (2) the scope of such audit. A negative certification, indicating performance problems, could influence the OIG to initiate an audit on a project that might not otherwise meet its criteria or focus attention in that area when a project would routinely be audited. Conversely, a positive certification could influence the OIG to perform little or no review of a project's operations.

We Found That

Of 16 facilities reviewed by the OIG for which WMD project officers had provided positive certifications, six facilities, or 37 percent were violating their NPDES permits, and four facilities were experiencing infiltration and inflow (I/I) problems. Facilities with new and existing sewers were hydraulically overloaded because of excessive I/I and deficient maintenance procedures. The excessive flows resulted in the discharge of untreated wastewater into receiving waters.

For example, one grantee received over \$2 million from EPA to construct a treatment facility and install a sewer system. After 1 year of operation, the facility began to experience a serious I/I problem which appeared to be the direct result of poor construction of the collection system. Subsequently, the grantee received a \$100,000 State grant to repair the problem. If the certification process had been operated properly, Region 3 could have identified the problem and encouraged the grantee to request the installing contractors to make the needed repairs.

It is essential that such performance problems be highlighted by the certification

process. Improved certifications would ensure that performance problems are disclosed so that corrective action could be required before the grant is closed. An improved certification process would help ensure that Federal, as well as grantee, monies were spent for projects that operated properly.

We Recommended That

The Regional Administrator, Region 3, assure that certifications identify to the OIG whether a facility is operating properly or complying with its NPDES permit requirements and highlight any problems with its performance.

What Action Was Taken

The final report (3100111) was issued to the Regional Administrator, Region 3, on February 23, 1993. A response to the final report is due by May 24, 1993. Although disagreeing with our draft report, the Region indicated a willingness to revise the certification process to make it more meaningful.

Improvements Needed in Region 7's Efforts to Identify and Report Internal Control Weaknesses

Problem

Region 7 had not effectively implemented the Federal Managers' Financial Integrity Act (FMFIA). As a result, the Region could not assure the Administrator that it was meeting its mission and protecting its resources.

We Found That

Region 7 had not properly administered FMFIA to incorporate management controls into the Region's day-to-day activities and understand the importance of maintaining and using up-to-

date, documented controls. While managers completed required FMFIA paperwork, they did not relate FMFIA to program activities or perform sufficient control assessments to disclose program weaknesses or resources highly vulnerable to abuse, loss, or theft.

From 1988 through 1992, Region 7 had not reported weaknesses in its assurance letter to the Administrator, although OIG audits and other reviews had identified significant weaknesses in the Region's operations. For example, the Region had not addressed contracts management as a high risk area, although OIG reviews and the Agency Research Triangle Park's Contract Management Division had disclosed weaknesses. In another case, the Region had not rated state monitoring as highly vulnerable, although adequate controls had not been established to evaluate states' compliance with air program requirements.

Because the Region did not have a strong commitment to FMFIA, Region 7 managers had not developed plans for determining whether subunit managers scheduled necessary management reviews. As a result, managers had not identified high risk areas and taken appropriate corrective action.

We Recommended That

The Acting Regional Administrator, Region 7:

- Ensure that managers' performance agreements include internal control responsibilities and managers are trained on their FMFIA responsibilities and appraised on their performance.

What Action Was Taken

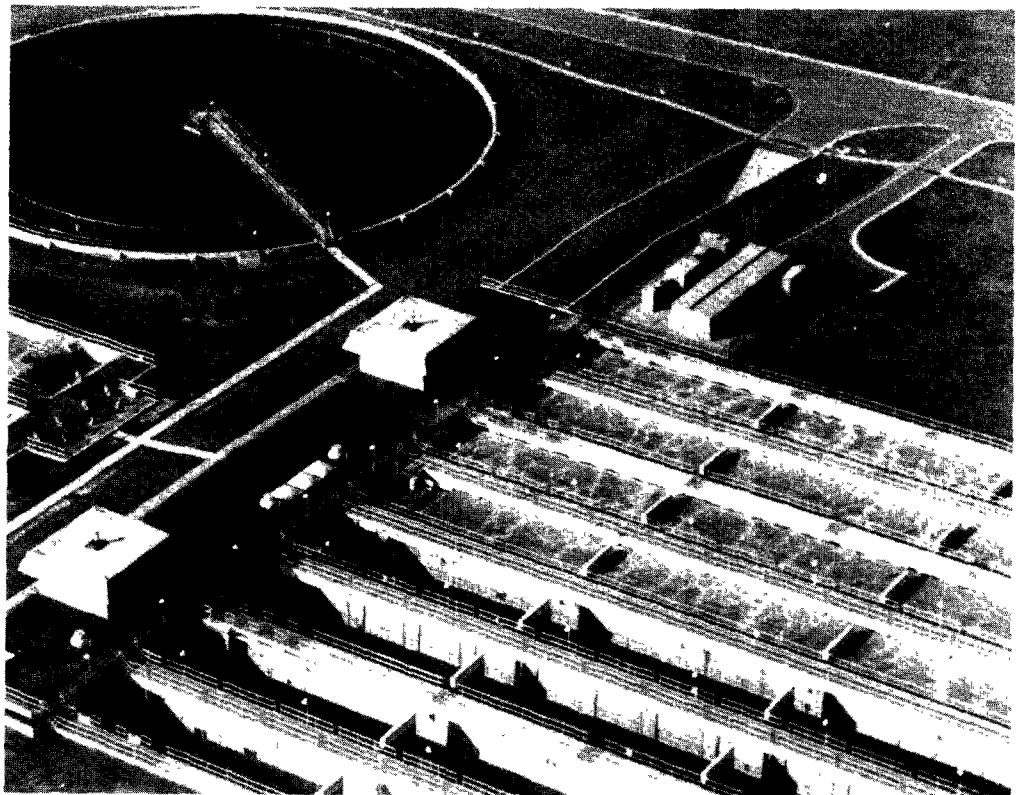
The final audit report (3100148) was issued to the Acting Regional Administrator, Region 7, on March 30, 1993. A response to the final report is due by June 28, 1993. In responding to the draft report, the Acting Regional Administrator generally agreed with the findings and recommendations and agreed to take corrective action. Until our recommendations are fully implemented, the Region cannot assure the Administrator that its internal controls are adequate.

Construction Grants

EPA's wastewater treatment works construction grants and State Revolving Fund (SRF) programs are the largest programs the Agency administers. Under the provisions of Public Law 92-500, as amended, the Agency was authorized to make construction grants covering 55 percent and, in some instances, up to 85 percent of the eligible costs of constructing wastewater treatment facilities. During this semiannual period, \$124 million was obligated on 9 new construction grant awards and 109 increases to existing grants. As of March 31, 1993, there were 2,498 grants involving \$18.8 billion which were potentially subject to

audit. Of this total, there were 502 active construction grants, representing \$4.6 billion in Federal obligations.

Amendments to the construction grants program are covered in Title II of the Water Quality Act of 1987. Section 212 created a new Title VI in the Clean Water Act, which addresses the process of phasing out the construction grants program by providing incentives for development of alternative funding mechanisms by the States. The new Title VI charges EPA with developing and implementing a program to provide grants to capitalize State revolving funds for financing wastewater projects. During this semiannual period, \$136 million was awarded for three continuation SRF grants. As of March 31, 1993, EPA had obligated \$6.7 billion to 50 States and Puerto Rico under the State Revolving Fund program.



Nearly \$14 Million of Questioned Costs Claimed for New York City Projects

Problem

New York City claimed \$2,423,359 of ineligible design and construction costs. An additional \$11,530,366 of unsupported costs were also questioned.

We Found That

EPA awarded eight grants totalling \$309,355,670 to New York City for the design and construction of additions and alterations to eight existing facilities. The grantee claimed \$2,423,359 of ineligible costs under those grants, including:

- \$1,496,343 of construction costs determined to be ineligible because of understated deductions for change orders, costs previously declared ineligible by the New York State Department of Environmental Conservation (NYSDEC), unapproved change orders, and ineligible bid items;

- \$574,239 of architectural engineering fees which exceeded the NYSDEC's approved contract amounts and related to ineligible construction; and

- \$352,777 of force account costs related to ineligible construction.

We also questioned \$11,530,366 of unsupported costs, including construction and engineering costs which exceeded approved contract amounts and force account costs which were incurred beyond the construction contracts' completion dates.

We Recommended That

The Acting Regional Administrator, Region 2, not participate in the Federal share of ineligible costs (\$1,337,198), determine the eligibility of the Federal share of unsupported

costs (\$6,380,330), and recover the applicable amount from the grantee.

What Action Was Taken

The final report (3100118) was issued to the Acting Regional Administrator, Region 2, on March 2, 1993. A response is due by June 1, 1993.

Orlando, Florida, Claimed Over \$4 Million of Ineligible Costs

Problem

Orlando, Florida, claimed \$4,392,846 of ineligible engineering and construction costs.

We Found That

EPA awarded a construction grant to Orlando to upgrade its McLeod Road Wastewater Treatment Plant, including the construction of a transmission pipeline and a distribution network for spray irrigation. The grantee claimed \$4,392,846 of ineligible costs, including:

- \$3,373,326 for engineering fees computed under the cost-plus-percentage-of-cost contract method, which is prohibited by EPA regulations;

- \$378,169 for design allowance in excess of the amount allowed by EPA regulations;

- \$367,916 for engineering fees applicable to construction outside the project's scope;

- \$152,831 for profit under change orders in excess of the amount allowed under the construction contract; and

- \$120,604 for maintenance and other costs claimed under change orders that were the responsibility of the grantee or its contractors and miscellaneous engineering fees.

We Recommended That

The Acting Regional Administrator, Region 4, not participate in the Federal share of ineligible costs (\$2,914,127) and recover this amount from the grantee.

What Action Was Taken

The final report (3300011) was issued to the Acting Regional Administrator, Region 4, on February 3, 1993. On April 26, 1993, Region 4 issued a letter to the grantee requesting that \$2,914,006 be refunded to EPA.

Baltimore, Maryland, Claimed Nearly \$3.9 Million of Questioned Costs

Problem

Baltimore, Maryland, claimed \$3,167,090 of ineligible architectural engineering, construction, administrative, and equipment costs. An additional \$730,476 of unsupported costs were questioned.

We Found That

EPA awarded a grant to the City of Baltimore to construct sludge handling and disposal facilities for the Patapsco Wastewater Treatment Plant. The grantee claimed \$3,167,090 of ineligible costs under the grant, including:

- \$2,095,075 of project inspection costs that exceeded incurred costs;

- \$498,119 of administrative and architectural engineering costs not supported by the expenditure report;

- \$266,591 of construction costs claimed in excess of eligible bid items and change orders and costs not related to the project;

- \$188,870 of administrative and architectural engineering costs attributed to ineligible construction;

- \$80,895 of administrative and engineering costs incurred after the project cutoff date; and

- \$37,540 of costs for equipment purchased without prior EPA approval.

We also questioned \$730,476 of costs primarily associated with a litigation claim against a contractor.

We Recommended That

The Acting Regional Administrator, Region 3, not participate in the Federal share of ineligible costs (\$2,375,318) and determine the eligibility of the Federal share of unsupported costs (\$547,877).

What Action Was Taken

The final report (3300026) was issued to the Acting Regional Administrator, Region 3, on March 25, 1993. A response is due by June 23, 1993.

Over \$3.1 Million of Ineligible Costs Claimed for Parkersburg, West Virginia, Project

Problem

The Parkersburg, West Virginia, Sanitary Board claimed \$3,143,885 of ineligible legal, architectural engineering, and equipment costs.

We Found That

EPA awarded grants to the Parkersburg Sanitary Board to construct a wastewater treatment plant designed to treat 9.7 million gallons of wastewater daily. We questioned \$3,143,885 of the grantee's final claim as ineligible for Federal grant participation, including:

- \$1,448,446 of legal fees, including those incurred for litigation against the architectural engineering firm related to the treatment plant's inability to operate as designed, which had previously been disapproved by EPA and the West Virginia Department of Natural Resources (WVDNR);

- \$1,058,287 of architectural engineering and project inspection fees which exceeded the engineer's budget and grant ceiling without any increase in scope of work, was included in another agreement for corrective work, or was applicable to ineligible construction;

- \$553,392 of construction and project improvement costs for duplicate and unused equipment, repair and maintenance equipment, change orders related to alternative technology, i.e., gas recovery for gas generation; and

- \$83,760 of administrative expenses previously determined ineligible for grant participation by WVDNR.

We Recommended That

The Acting Regional Administrator, Region 3, not participate in the Federal share of ineligible costs (\$1,856,114) and recover the applicable amount from the grantee.

What Action Was Taken

The final report (3300013) was issued to the Acting Regional Administrator, Region 3, on February 10, 1993. A response is due by May 9, 1993.

Sacramento, California, Claimed Over \$4 Million of Ineligible and Unreasonable Costs

Problem

The Sacramento Regional County Sanitation District, Sacramento, California, claimed \$1,395,800 of ineligible administrative, force account, engineering, construction, and land acquisition costs. An additional \$2,624,778 of unreasonable project costs were questioned.

We Found That

EPA awarded five grants totaling \$288,800,986 to the County for the design and construction of wastewater treatment facilities. These facilities included a cryogenic plant, an interceptor, an outfall, solids handling facilities, and a combined wet weather control system. We questioned \$1,395,800 of the costs included in the grantee's final claim as ineligible, including:

- \$961,744 of administrative, force account, construction, and relocation costs which were outside the scope of the approved project;

- \$257,738 of administrative, force account, and engineering costs allocable to the ineligible portion of the construction project; and

- \$176,318 of engineering and land acquisition costs related to easements and rights-of-way which had previously been disallowed by EPA as unnecessary for the construction of the project.

Additionally, we questioned \$2,624,778 of unreasonable costs claimed in excess of the approved grant amount.

We Recommended That

The Acting Regional Administrator, Region 9, not participate in the Federal share

of ineligible costs (\$1,049,051) and determine the eligibility of the Federal share (\$1,968,584) of unreasonable costs.

What Action Was Taken

The final report (3300010) was issued to the Acting Regional Administrator, Region 9, on February 1, 1993. A response to the final report is due by May 2, 1993.

Grantee's \$9.1 Million Project Claim Questioned Pending Compliance With Discharge Requirements

Problem

The Sausalito-Marín City Sanitary District, Sausalito, California, claimed \$9,082,508 of costs for the design and construction improvements to a wastewater treatment facility that was not consistently meeting waste discharge requirements.

We Found That

EPA awarded two grants to the Sausalito-Marín City Sanitary District for the design and construction of improvements to its wastewater treatment facility. At the time of the California State Water Resources Control Board's (SWRCB) final inspection in May 1990, the grantee was not consistently meeting waste discharge limitations. The grantee is responsible for completing the facility to specifications, maintenance and operation, and correction of deficiencies to meet discharge requirements for the facility's design life.

A January 1992 inspection by the California Regional Water Facility Board indicated that modifications to the facility had resulted in its successfully meeting standards for suspended solids, but not for settleable solids. Although, the grantee has apparently

expended significant efforts since start-up of the facility in 1987, the costs claimed cannot be accepted without the SWRCB's certification that the facility is meeting its discharge limitations. Therefore, we questioned \$8,023,895 of the grantee's claim as unreasonable, pending EPA's receipt of such certification.

Should the grantee eventually obtain a certification from the SWRCB, we still question \$1,058,613 of the costs included in the grantee's final claim as ineligible, including:

- \$1,002,874 of costs allocable to the facility's capacity reserved for the United States Department of Interior; and

- \$55,739 of administrative and engineering costs considered outside the scope of the approved project or allocable to the ineligible portion of construction.

We Recommended That

The Acting Regional Administrator, Region 9, disallow the Federal share of ineligible costs (\$793,961), assess the eligibility of the Federal share of unreasonable costs (\$6,017,921), and recover the applicable amount from the grantee.

What Action Was Taken

The final report (3300022) was issued to the Acting Regional Administrator, Region 9, on March 16, 1993. A response is due by June 14, 1993.

Superfund Program

The Superfund program was created by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). The Act provided a \$1.6 billion trust fund to pay for the costs associated with the cleanup of sites contaminated with hazardous waste. Taxing authority for the trust fund expired on September 30, 1985. For more than a year, the Superfund program operated at a reduced level from carryover funds and temporary funds provided by Congress.

On October 17, 1986, the Superfund Amendments and Reauthorization Act of 1986 (SARA) was enacted. It provided \$8.5 billion to continue the program for 5 more years and made many program changes. On November 5, 1990, the Omnibus Budget Reconciliation Act of 1990 was enacted, authorizing appropriations for 3 additional years and extension of the taxing authority for 4 years.

The parties responsible for the hazardous substances are liable for cleaning up the site or reimbursing the Government for doing so. States in which

there is a release of hazardous materials are required to pay 10 percent of the costs of Fund-financed remedial actions, or 50 percent if the source of the hazard was operated by the State or local government.

The enactment of SARA increased the audit requirements for the Inspector General. In addition to providing a much larger and more complex program for which the OIG needs to provide audit coverage, SARA gave the Inspector General a number of specific responsibilities. Mandatory annual audit areas include:

- Audit of all payments, obligations, reimbursements, or other uses of the Fund;
- Audit of Superfund claims;
- Examination of a sample of agreements with States carrying out response actions; and
- Examination of remedial investigations and feasibility studies.

The Inspector General is required to submit an annual report to the Congress regarding the required Superfund audit work, containing such recommendations as the Inspector General deems appropriate. The sixth annual report, covering fiscal 1992, must be issued by September 1993.

Improvements Needed in Timeliness and Controls Over Responsible Party (RP) Cleanups

Problem

The Agency's use of RPs to clean up Superfund sites has been hampered by numerous problems, including delays in initiating cleanups, lack of aggressive enforcement actions, and ineffective management of contractors.

Background

Through September 1992, EPA had negotiated over \$7 billion of settlements with RPs, of which over \$5 billion had been negotiated since 1989. During the past 4 years, the OIG and the U.S. General Accounting Office issued 15 audit reports covering all aspects of Superfund enforcement activities which are summarized in this capping report.

We Found That

EPA's cleanup process was extended by many delays in all phases of the process.

These delays included initiating searches for RPs; negotiating settlement agreements after RPs were identified; EPA Regions' review and approval of RP deliverables, such as work plans and project operation

plans; and contractor submissions of deliverables such as reports on RP searches. The Agency was reluctant to set time frames for its own actions because of individual site uniqueness. Project managers, who were mainly responsible for many cleanup tasks, had inadequate supervision, training, guidance, resources, or monitoring tools to assist them in accomplishing their work.

There was a lack of aggressiveness in EPA's Superfund enforcement program. Stipulated penalties were not pursued. EPA primarily relied on verbal negotiations and warning letters in an attempt to encourage RPs to comply. Agency officials believed the use of stipulated penalties should be discretionary and there should be a balance between cooperation and enforcement.

EPA ineffectively managed contractors used to identify and monitor RP activities at cleanup sites. There were insufficient safeguards to assure appropriate contractor performance. Moreover, planning was ineffective because the differences and complexities of required tasks were not considered.

EPA's automated tracking systems were not always sufficiently comprehensive, current or accurate to allow timely and effective management oversight.

Systems were not always designed to monitor essential data on the cleanup process, and some offices still used manual systems. Program personnel were not always aware of the existence or capability of these monitoring tools, encouraged to use them, or sufficiently motivated to assure timely and accurate data input.

There was a lack of documentation in all phases of the Superfund enforcement process. Key decisions and significant events were not always recorded or maintained in official files. Reports and minutes of meetings were not



prepared, and justifications of strategies or positions were not written or retained. Personnel did not give priority to preparing or maintaining appropriate documentation and files.

EPA has made progress in getting RPs involved in cleaning up Superfund sites and taking responsibility for their share of costs associated with the cleanups. However, EPA's enforcement program provided little incentive for RP compliance and sometimes tended to delay the overall cleanup progress. Despite EPA's efforts, there has not been a marked increase in enforcement efforts against noncomplying RPs. In addition, EPA Headquarters still had not determined the types and composition of Agency systems needed for tracking cleanups to allow timely and effective management oversight.

We Recommended That

The Assistant Administrators for Solid Waste and Emergency Response and Enforcement:

- Require EPA Headquarters policy guidance be established, updated, reinforced, or implemented with respect to Superfund cleanup activities in the areas of RP oversight, timeliness, stipulated penalty, cost recovery enforcement, contract monitoring, data input, and documentation;
- Require EPA Headquarters to perform in-depth annual reviews which evaluate the quality and consistency of program performance; and
- Establish a task force to review all enforcement management systems.

What Action Was Taken

The final report (3100152) was issued on March 31, 1993, to the Acting Assistant Administrator for Solid Waste and Emergency Response and the Acting Assistant

Administrator for Enforcement. A response to the final report is due by June 29, 1993. In responding to the draft report, the Acting Assistant Administrator for Solid Waste and Emergency Response generally agreed with our findings. EPA had initiated several actions to address the problems discussed in the report, including issuing new guidance to speed the negotiation process, reorganizing to facilitate closer regional management involvement, and streamlining the cleanup process.

Continuing Weaknesses in Superfund Accounting and Controls

Problem

Pervasive and persistent problems related to managing accounts receivable and personal property have continued during the 10 years of the Superfund program. In addition, the Agency's Integrated Financial Management System (IFMS) did not provide complete and accurate reports to Superfund management.

We Found That

While Superfund obligations and disbursements for fiscal years 1981 through 1990 appropriations were presented fairly, there were continuing weaknesses in controls over resources and assets, primarily relating to managing accounts receivable and personal property. In addition, although the Agency's IFMS was implemented in fiscal 1989 to provide a comprehensive financial management system, IFMS did not provide complete and accurate reports for management.

From 1983 through 1990, over \$94 million of receivables were not posted timely. For example, in 1989 and 1990, \$40.3 million of receivables were not posted in the correct

year. In addition, the Agency did not always take action required to follow up on late accounts or assess added charges to such accounts. Without proper management of receivables, EPA cannot collect funds to which it is entitled.

Problems have persisted in recording, locating, and accounting for property since 1982. As of September 30, 1990, Superfund property recorded in the property system totaled \$76.5 million, but \$12 million in property purchased since 1981 had not been recorded. Property was not recorded because contracting offices, custodial officers, and receiving personnel did not always forward obligating documents and receiving reports to property officials. Also, several regional offices had not performed annual inventories and reconciliations of their property for years.

In some cases, the Agency reported the above problems to the President as required by the Federal Managers' Financial Integrity Act. The Agency has generally completed or initiated actions to correct the problems found in the Superfund program. However, most of the procedures and internal controls reviewed cross program lines and were applicable Agency-wide.

We Recommended That

The Assistant Administrator for Administration and Resources Management, who is also the Chief Financial Officer and the senior internal control official, inform other principal managers within the Agency and the Senior Council on Management Controls about the persistent weaknesses found in the Superfund program over the past decade.

What Action Was Taken

The audit report (3100058) was issued to the Assistant Administrator for Administration and Resources Management and the Assistant

Administrator for Solid Waste and Emergency Response on December 29, 1992. In response to the audit report, the Assistant Administrator for Administration and Resources Management agreed to implement our recommendation.

Superfund Indirect Cost Rates Not Adequate for Full Recovery of Cleanup Costs

Problem

EPA's fiscal 1987 and 1988 Superfund indirect cost rate calculations inappropriately excluded \$144.2 million and \$225.9 million, respectively, severely reducing the total amounts for recovery from parties responsible for hazardous waste sites.

Background

The cost of removal and remedial actions incurred by EPA include direct and indirect costs, both of which are recoverable from responsible parties (RP) under the Comprehensive Environmental Response, Compensation, and Liability Act. On August 6, 1992, EPA published in the *Federal Register* a major proposed change in the methodology for calculating indirect cost rates that would provide for "full cost recovery."

We Found That

Although the present conservative method for calculating Superfund indirect cost rates complies with Agency guidance, this method did not present fairly the Superfund indirect cost rates for fiscal years 1988 and 1987 in conformity with generally accepted accounting principles. Because significant costs were excluded from the indirect cost pools, EPA's indirect cost rates were not high enough to ensure full recovery from RPs of costs incurred by the Government in

cleaning up hazardous waste sites. These costs are for assessment of sites before starting remedial, removal, and enforcement activities, research and development, and depreciation for capital expenditures.

The costs excluded from the indirect cost pools amounted to \$370 million for fiscal 1988 and 1987. If these costs are not included in the indirect cost pools and then sought, they will never be recovered from RPs. In addition to costs omitted from the indirect costpool, the way costs were allocated to sites resulted in the Agency not recovering part of the indirect costs.

Further, delays in establishing indirect cost rates result in underrecoveries from RPs of costs incurred by the Government in cleaning up hazardous waste sites. The fiscal 1987 indirect cost rates were not established until September 28, 1989, and the fiscal 1988 rates were not established as of February 22, 1993.

We Recommended That

The Comptroller establish a time frame for timely completion of calculations and establishment of provisional indirect cost rates in accordance with its proposed rule which provides for full cost recovery of cleanup costs.

What Action Was Taken

The final audit report (3100114) was issued to the Assistant Administrator for Administration and Resources Management on February 22, 1993. A response to the final report is due by May 24, 1993. In response to our draft report, the Assistant Administrator generally agreed with our findings and recommendation.

Special And Early Warning Reviews

This section in our semiannual report describes the results of significant and potential findings, deficiencies, and recommendations which have been identified through evaluations, analyses, projects, and audits. These reviews are intended to help Agency managers correct problems and recognize the potential for savings before resources are fully committed.

Special Reviews

Special reviews are narrowly focused studies of programs or activities providing management a timely, informative, independent picture of operations. Special reviews are not statistical research studies or detailed audits. Rather, they are information gathering studies that identify issue areas for management attention.

\$1.6 Million in EPA Training Grants Not Adequately Evaluated

Problem

EPA did not adequately monitor or evaluate the effectiveness of training provided to assist minority contractors in obtaining environmental contracts. In addition, EPA awarded grants without considering alternative lower cost sources.

We Found That

The Office of Small and Disadvantaged Business Utilization (OSDBU) had awarded grants totalling \$1.6 million to the National Association of Minority Contractors (NAMC) to provide training to small, minority and disadvantaged businesses in the areas of Superfund, Leaking Underground Storage Tanks, Asbestos, and Radon. Neither NAMC or OSDBU determined whether the minority contractors who attended the training subsequently received contracts in the above areas, which was the principal objective of the grants. Of 33 minority contractors we contacted, only 15, or 45 percent, were working in the environmental field for which NAMC had provided them training.

In addition, as a result of OSDBU's and the Grants Administration Division's failure to adequately monitor the grantee, NAMC did not (1) submit progress and financial status reports; (2) perform need surveys; (3) develop indirect cost rate proposals; and (4) comply with OMB Circular A-133 requiring nonprofit institutions receiving \$100,000 or more each year in Federal awards to have annual audits conducted. These deficiencies resulted primarily from a lack of supervisory review and insufficient training of the project officer.

Also, during fiscal 1989 through 1991, EPA awarded

grants totaling \$1.8 million (including the \$1.6 million of grants funded by OSDBU) to NAMC without considering lower cost alternative training sources. NAMC's costs per course ranged from \$442 to \$3,425 per person. Other nonprofit institutions were providing similar training for between \$325 and \$775. As a result, EPA may have paid unreasonably high costs to train minority contractors.

We Recommended That

The Directors of OSDBU and the Grants Administration Division (GAD) provide sufficient training and increased supervisory review of project officers to ensure that training grants are adequately monitored.

What Action Was Taken

The final special review report (3400017) was issued to the Directors of OSDBU and GAD on January 25, 1993. In responding to the draft report, the Directors agreed with the issues and recommendations presented in the draft report. A response due to the final report by April 26, 1993, had not been received as of April 28, 1993.

Better Accounting Needed For Oil Spill Funds

Problem

EPA did not have adequate controls or procedures to properly account for \$18.4 million available in fiscal 1992 from the Oil Spill Liability Trust Fund.

Background

A five-cent tax on each barrel of imported oil is charged and deposited in the Oil Spill Liability Trust Fund. These funds are earmarked for oil pollution prevention and cleanup actions by Federal agencies.

We Found That

EPA's Offices of Research and Development (ORD) and Enforcement (OE) received \$2,571,400 in fiscal 1992 from the Oil Spill Liability Trust Fund without account numbers for separately tracking Oil Spill expenditures or guidance from the EPA Comptroller. Further, these two offices were not formally advised that they had been allocated Oil Spill funds. Also, the Office of the Comptroller did not act to make the appropriated Oil Spill funding available for disbursement until after we raised the issue in March 1992, nearly 7 months into the fiscal year.

We Recommended That

The Chief Financial Officer:

- Review the Agency's fiscal 1992 obligations and expenditures and adjust the Agency's accounting records to accurately reflect EPA's use of the Oil Spill Liability Trust Fund.
- Establish policies and procedures to ensure that the Agency's annual appropriations act is reviewed, all necessary accounting codes have been established, and adequate guidance has been provided to program and regional offices.
- Develop procedures and assign responsibility for ensuring that all funds appropriated from the Trust Fund are properly transferred to an EPA account so that they are available for EPA's use.

What Action Was Taken

The final special review report (3100039) was issued to the Chief Financial Officer on March 31, 1993. The Chief Financial Officer, in responding to the draft report, generally agreed with our findings and recommendations. He stated that a survey of all offices that received funds during fiscal

1992 indicated that all funds were used for their intended purposes. Also, he stated that steps had been taken to ensure that all funds appropriated from the Trust Fund are properly transferred to an EPA account. A response to the final report is due by June 29, 1993.

EPA Lacks an Adequate Energy Conservation Program

Problem

EPA had not developed an energy management and conservation program as required by statutes and regulations. As a result, EPA could not adequately determine its energy consumption costs and measure its progress in reducing consumption.

Background

The 1975 Energy Policy and Conservation Act and subsequent energy conservation legislation requires Federal agencies to develop a 10-year plan to conserve energy in Federally owned or leased buildings. The 1992 Energy Policy Act requires all Federal Inspectors General to review each Agency's compliance with energy conservation requirements.

We Found That

EPA was not in substantial compliance with energy conservation requirements. In 1984 EPA began to develop an Agency-wide program but did not complete the project. The Agency recently re-initiated the effort, with EPA's Facilities Management and Services Division assuming responsibility for developing a program, but did not assign clear organizational responsibilities or commit the resources necessary to implement the program. As a

result, EPA did not have an Agency-wide 10-year plan for reducing energy consumption. Although EPA had initiated an energy program for its Washington, D.C. site, formal energy programs were not implemented at the other eight field sites reviewed.

In addition, EPA did not have a complete Agency-wide data base of energy consumption and cost data for fiscal 1985 through fiscal 1992. Therefore, EPA was unable to monitor its progress in meeting required energy consumption reduction of 20 percent from its fiscal 1985 base. EPA's fiscal 1992 energy consumption data base did not include an estimated 38 percent of the total square footage of facilities for which EPA was required to report, resulting in substantial understatement of energy consumption costs.

EPA implemented a "Green Lights" program for retrofitting buildings with energy efficient lighting. However, EPA had not developed a centrally organized and comprehensive survey and retrofit program to identify, install, and monitor all types of potential retrofit projects.

We Recommended That

The Assistant Administrator for Administration and Resources Management:

- Establish and implement an Agency-wide energy management and conservation program in compliance with applicable statutes and regulations.
- Formally designate an Agency-wide energy coordinator and assign clear organizational responsibilities and authority to implement the program.
- Establish a program to identify and monitor retrofit activities.

- Establish controls and procedures to maintain timely and accurate energy consumption data.

- Establish controls and procedures to ensure that 10-year plans and progress reports are prepared and updated.

- Request sufficient resources to comply with applicable energy conservation statutes and regulations.

What Action Was Taken

The special review report (3400024) was issued to the Assistant Administrator for Administration and Resources Management on February 22, 1993. A response to the final report is due by May 23, 1993. The Assistant Administrator's response to the draft report generally agreed with our findings and recommendations.

Improper Procurements Circumvented Federal Acquisition Regulation

Problem

Office of Communications, Education, and Public Affairs (OCEPA) officials routinely obtained goods and services without proper authorization or competition as required by the Federal Acquisition Regulation.

We Found That

OCEPA staff preselected vendors and prepared vague or inadequate statements of work. For one procurement action, a contractor was asked to provide two other sources to compete with its bid. This same vendor was paid for a videotape that was never received. In another case, OCEPA officials split one requirement into three separate purchase orders to avoid the competitive process

and requested the Procurement and Contracts Management Division (PCMD) to process a fourth purchase order, which PCMD refused to do. Also, OCEPA used contracts or interagency agreements established by other offices to ensure that services were obtained from contractors of choice. OCEPA made unauthorized procurements by receiving goods and services before purchase orders were issued, or occasionally without purchase orders being issued at all.

OCEPA made improper procurements because managers did not adequately plan for anticipated requirements and placed more importance on "who" was to provide goods and services, rather than "what" goods and services were needed. And, the Senior Procurement Officer failed to ensure the effectiveness and integrity of OCEPA's procurement activities.

We Recommended That

The Associate Administrator for Communications, Education, and Public Affairs:

- Ensure that contract requirements are competed; statements of work are complete; and no work is performed before a contract or purchase order has been issued.
- Ensure that staff involved in procurement are properly trained and designate a senior-level official as OCEPA's Senior Procurement Officer.

What Action Was Taken

The special review report (3400035) was issued on March 31, 1993. In responding to our draft report, the Associate Administrator for Communications, Education, and Public Affairs agreed with our report's findings and has implemented or is in the

process of implementing all of our recommendations. A response to the final report is due by June 29, 1993.

EPA'S Administration of the Federal Employees' Compensation Act Needs Improvement

Problem

EPA has not adequately managed claims and payments under the Federal Employees' Compensation Act (FECA). As a result, EPA may be paying benefits for individuals who are not EPA employees and may not be encouraging its employees to return to work as soon as possible.

We Found That

Despite knowing that it is often charged by the Department of Labor (DOL) for benefits paid to individuals who are not EPA employees, EPA was not verifying or correctly assigning FECA costs. Under the chargeback system, the costs of compensation for job-related injuries and deaths paid by DOL are assigned to employing agencies. FECA charges to EPA in 1992 totalled \$2,142,269.

Costs are not being charged to the lowest organizational level and managers may not have a monetary incentive for seeking their employees' return to work. Instead, most employees are lumped organizationally under the Office of Administrator, even though they are assigned to a region or headquarters program office. Of the 353 employee cases that EPA paid in 1992, 231 cases, or 66 percent, were coded as belonging to the Office of the Administrator.

EPA had not designated organizational responsibility for all FECA functions and there was no national FECA policy, guidance, or oversight. The Agency had not adequately trained supervisors, managers,

and employees about their FECA responsibilities, nor had it effectively communicated and coordinated FECA activities with DOL. EPA had not established a light duty/return-to-work program. Lack of prompt action to return employees to work or accommodate employees with special needs can increase FECA costs.

We Recommended That

The Assistant Administrator for Administration and Resources Management:

- Verify the FECA chargeback report and work with DOL to assign chargeback codes at the lowest practical organizational level;
- Clearly identify the offices responsible for FECA functions and establish or update Agency policy, procedures, and guidance to accurately reflect current FECA requirements.
- Establish an Agency-wide light duty/return-to-work program and FECA monitoring and evaluation program; and
- Disseminate information to all employees about FECA's coverage, responsibilities, and claims processing requirements.

What Action Was Taken

The special review report (3400033) was issued to the Assistant Administrator for Administration and Resources Management on March 26, 1993. In responding to the draft report, the Assistant Administrator generally concurred with our findings and recommendations. A response to the final report is due by June 14, 1993.

Construction Grant Early Warning System

This program is designed to identify potential problem construction projects early in their life cycle so that EPA management can take appropriate corrective action.

The long-range goal of the construction grants program is to reduce the discharge of municipal wastewater pollutants to improve water quality and protect public health. EPA provides grants to municipal agencies to assist in financing the construction of wastewater treatment works, a process which takes 2 to 10 years to complete.

Because audits are generally performed after the project is complete, problems which affect the efficient design, construction, management, or operation of a treatment plant are not disclosed until thousands or millions of dollars have been spent. Under its early warning system, the OIG reviews projects to identify problems and preclude the ineffective expenditure of funds. Some reviews focus on certain indicators and attributes that can suggest the likelihood of a potential problem.

\$21.5 Million Grant to San Diego Should Be Annulled

Problem

San Diego, California, has no need for a land outfall after it canceled plans to construct a related secondary treatment plant.

We Found That

EPA awarded a \$21.5 million grant to San Diego in 1989 to participate in a 2.3 mile, 12-foot diameter land outfall to serve two proposed secondary wastewater treatment plants (San Diego and International Treatment Plants). Although required by a special grant condition, San Diego canceled its plans to construct the secondary plant. Therefore, the nearly completed land outfall will not be used by San Diego for its intended purpose, nor will it be used in the foreseeable future.

San Diego maintained that, although the treatment plant may not be built, the land outfall could be used for future flows from other projects. Because these projects are not scheduled to be built until 2025, they cannot satisfy the special grant condition.

The award of the land outfall grant was premature. San Diego's primary purpose in seeking the grant was to take

advantage of EPA construction grant funds which were expiring in 1988. However, at the time of grant award, San Diego had not decided on whether a treatment plant would be built or designated the area to be served.

We Recommended That

The Regional Administrator, Region 9:

- Not participate in the Federal share of ineligible costs (\$11.8 million) by annulling the land outfall grant, unless the secondary treatment plant is constructed in accordance with the approved facility plan.

- Advise San Diego that the use of available land outfall capacity to accommodate future flows from other projects which exceeded its existing needs are ineligible for grant funding.

What Action Was Taken

The special review report (3400037) was issued to the Regional Administrator, Region 9, on March 29, 1993. In response to our March 1, 1993, position paper, San Diego disagreed that it had violated the grant condition requiring construction of the secondary treatment plant. A response to the final report is due by June 29, 1993.

\$7.2 Million Middletown, California, Project Does Not Meet Effluent Goals

Problem

The Lake County Sanitation District in Middletown, California, claimed \$1.7 million of costs for a leaking storage pond and an unused disposal system for treated effluent which rendered the project in noncompliance with its discharge permit.

We Found That

EPA awarded a \$7.2 million grant to the Lake County Sanitation District for construction of a sewage treatment facility, including a storage pond of about 20 acres (with a capacity of about 79 million gallons) and an 88-acre disposal area. The facility was designed to provide controlled disposal of treated wastewater by spray irrigation. We questioned \$1.7 million of the grantee's claimed costs as ineligible, including:

- \$300,000 for the storage pond which had not been properly constructed or adequately tested and leaked excessively, even after being repaired; and
- \$1.4 million for the disposal system that was not being used for irrigation because of

the lower than expected flows into the storage pond and the leakage of the storage pond.

Consequently, the District had not fulfilled the grant objective requiring the disposal of the wastewater effluent into an 88-acre area for crop irrigation. As a result, the District was violating its waste discharge permit because the leakage experienced in the storage pond caused the effluent to flow directly into the ground. After several years, the concentration of nitrates in the groundwater would likely approach or exceed the state's drinking water standards, thereby potentially threatening the community's public water supply.

We Recommended That

The Acting Regional Administrator, Region 9, disallow the costs of the storage pond and disposal system for grant funding, unless the District demonstrates that the facilities are being used and the project is in compliance with the waste discharge permit.

What Action Was Taken

The special review report (3400016) was issued to the Acting Regional Administrator, Region 9, on January 21, 1993. A response due by April 20, 1993, had not been received as of April 28, 1993.

The unnecessary 2.3 mile outfall (photo by Western Audit Division staff)



Lake County Sewage Treatment Plant (OIG photo by Western Audit Division staff)

Section 2—Report Resolution

As required by the Inspector General Act, as amended, this section contains information on reports in the resolution process for the semiannual period. This section also summarizes OIG reviews of the Agency's followup actions on selected reports completed in prior periods. In addition, information is presented on the resolution of significant reports issued by the OIG involving monetary recommendations.

Appendix 2 summarizes the status of each report issued before the commencement of the reporting period for which no management decision had been made by the end of the reporting period.

EPA Office of Inspector General Status Report On Perpetual Inventory of Reports in Resolution Process For The Semiannual Period Ending: March 31, 1993

Dollar Values (in thousands)					
	Number	Report Issuance		Report Resolution Costs Sustained	
		Questioned Costs	Recommended Efficiencies	To Be Recovered	As Efficiencies
A. For which no management decision has been made by the commencement of the reporting period*	341	437,616	233,670	—	—
B. Which were issued during the reporting period	722	132,332	16,296	—	—
C. Which were issued during the reporting period that required no resolution	509	0	0	—	—
Subtotals (A + B - C)	554	569,948	249,966	—	—
D. For which a management decision was made during the reporting period	224	66,965	118,388	26,808	5,398
E. For which no management decision has been made by the end of the reporting period	330	502,983	131,578	—	—
Reports for which no management decision was made within six months of issuance	146	371,0632	115,579	—	—

* Any difference in number of reports and amounts of questioned costs or recommended efficiencies between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

Audit Followup

The Inspector General Act Amendments of 1988 have focused increased attention on Agency responses to the findings of the Inspectors General (IG). Agency management is now required to report semiannually, in a separate report to Congress, the corrective actions taken in response to the IG's reviews. The Office of Inspector General reviews the Agency's followup actions on selected reviews. Below are summaries of two of these reviews.

Despite Progress in Superfund Post-settlement Activities, Additional Actions Are Still Needed

Previous Problems and Findings

Our March 1990 audit concluded that Region 2 needed to intensify its oversight of responsible party (RP) activities to assure timely completion of Superfund cleanups and proper compliance with settlement requirements. We reported that the initiation of Superfund cleanup work was unnecessarily delayed because of the Region's lengthy review and approval of plans and other documents before work could be undertaken; stipulated penalties were not being assessed for noncompliance with settlement milestone dates; improvement was needed in the oversight of Technical Enforcement Support (TES) contractors; and oversight costs were not being recovered from RPs.

Followup Findings

Our followup report (3400005) found that Region 2 had initiated actions to correct many of the findings from our prior audit. Several of these had been implemented, while others were in the development stage.

Regional internal review problems were still resulting in the approval process for RPs' plans and documents taking more than a year. Recent regional initiatives to decrease the project manager/site ratio and supervisor/staff ratio could further improve the timeliness of the approval process.

The Region had not implemented an effective system for the timely recovery from RPs of costs incurred by EPA in overseeing the cleanup of Superfund sites. EPA had collected or initiated actions to collect oversight costs for only

3 of the 8 cases totaling \$627,761 cited in our prior report, while costs continued to accumulate.

Followup Recommendations

We recommended that the Regional Administrator, Region 2:

- Complete and implement guidance on timely regional review and approval of plans and other documents submitted by RPs for Superfund cleanups.
- Implement the Region's proposal on stipulated penalties.
- Implement an effective system for the timely recovery of Superfund cleanup oversight costs.
- Use a computerized narrative containing sufficient detail to record the conditions observed at TES contractors' sites.

What Action Was Taken

The special review report (3400005) was issued on November 24, 1992, to the Regional Administrator, Region 2. A response due by February 24, 1993, had not been received as of April 28, 1993. In responding to the draft report, the Region generally agreed with the report's findings and recommendations. However, the Region did not concur with the recommendation that specific time frames be established for review and approval of RP submissions.

Major Improvements Made to Properly Dispose of Banned Pesticides

Previous Problems and Findings

After hearings in 1986 and 1987, the House Government Operations Committee recommended that EPA develop a policy for holders to properly store and report emergency suspended and cancelled (banned) pesticides. EPA had banned three pesticides—Ethylene Dibromide, 2,4,5-T/silvex, and dinoseb. Our September 1990 report found that EPA still had not ensured that banned pesticides holders safely controlled their stocks and complied with disposal rules. Regions and States could not fully identify and inspect all known banned pesticide storage locations because EPA had not developed procedures to match Headquarters, Region and State records. Also, emergency planners and fire officials were not aware of banned pesticide storage locations or emergency handling procedures.

Followup Findings

Our followup report found that the Office of Prevention, Pesticides and Toxic Substances (OPPTS) had initiated action to address most of the findings and recommendations in our 1990 report. For those findings where corrective action had not been taken, OPPTS proposed to take such action during the next year.

The OPPTS Office of Compliance Monitoring (OCM) still did not have complete information to track dinoseb inspections and did not track referrals separately from the regular inspections. Also, even though OPPTS had distributed lists of dinoseb holders, the emergency planners and fire officials still did not have the information.

OPPTS had nearly completed its collection and disposal of dinoseb, but agreed to continue to improve its program to ensure safe storage and disposal of any uncollected amounts of the pesticide.

OPPTS also agreed to take action to improve its internal control system. Our review found that OPPTS did not follow the Agency's guidance for documenting alternative internal control reviews or training. Also, OPPTS did not use the Management Audit Tracking System to monitor corrective action plans for OIG audits. Without improving its internal control system, OPPTS may not detect or correct program deficiencies.

The 1988 amendments to the Federal Insecticide, Fungicide, and Rodenticide Act eliminated the requirement that OPPTS must accept banned pesticides and dispose of them. OPPTS can now require registrants to recall banned pesticides. However, OPPTS has not completed new regulations for storage and disposal of banned pesticides. It is unclear how OPPTS will ensure the safe disposal of future banned pesticides until the regulations are completed.

What Action Was Taken

The final report (3400030) was issued to the Acting Assistant Administrator for Prevention, Pesticides and Toxic Substances on March 26, 1993. A response to the final report is due by June 14, 1993. In responding to the draft report, the Agency agreed with our findings and proposed corrective actions to address all of our recommendations. As a result, the final report contained no recommendations and was closed upon issuance.

Status of Management Decisions on IG Reports

This section presents statistical information as required by the Inspector General Act Amendments of 1988 on the status of EPA management decisions on reports issued by the OIG involving monetary recommendations. In order to provide uniformity in reporting between the various agencies, the President's Council on Integrity and Efficiency issued guidance on reporting the costs under required statistical tables of sections 5(a)(8) and (9) of the Act, as amended.

As presented, information contained in Tables 1 and 2 cannot be used to assess results of reviews performed or controlled by this office. Many of the reports counted were performed by other Federal auditors or independent public accountants under the Single Audit Act. EPA OIG staff does not manage or control such assignments. In addition, amounts shown as costs questioned or recommended to be put to better use contain amounts which were at the time of the review unsupported by adequate documentation or records. Since auditees frequently provide additional documentation to support the allowability of such costs subsequent to report issuance, we expect that a high proportion of unsupported costs will not be sustained.

EPA OIG controlled reports resolved during this period resulted in \$21.7 million being sustained out of \$31.8 million considered ineligible in reports under OIG control. This is a 68 percent sustained rate.

Table 1—Inspector General Issued Reports With Questioned Costs Semiannual Period Ending: March 31, 1993

	Number	Dollar Values (thousands)	
		Questioned* Costs	Unsupported Costs
A. For which no management decision has been made by the commencement of the reporting period**	155	437,616	89,358
B. New Reports issued during period	71	132,332	38,611
Subtotals (A + B)	226	569,948	127,969
C. For which a management decision was made during the reporting period	79	66,965	23,207
(i) Dollar value of disallowed costs	61	26,808	2,273
(ii) Dollar value of costs not disallowed***	46	40,157	20,934
D. For which no management decision has been made by the end of the reporting period	147	502,983	104,762
Reports for which no management decision was made within six months of issuance	81	371,063	66,151

* Questioned costs include the unsupported costs.

** Any difference in number of reports and amounts of questioned costs or recommended efficiencies between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

*** On 18 reports management did not sustain any of the \$20,777,579 questioned costs. Twenty-eight reports are also included in C(ii) because they were only partially sustained. Only the costs questioned that were not sustained in C(i) are included in this category.

Table 2—Inspector General Issued Reports With Recommendations That Funds Be Put To Better Use Semiannual Period Ending: March 31, 1993

	Number	Dollar Value (in thousands)
A. For which no management decision has been made by the commencement of the reporting period*	67	233,670
B. Which were issued during the reporting period	15	16,296
Subtotals (A + B)	82	249,966
C. For which a management decision was made during the reporting period	41	118,388
(i) Dollar value of recommendations that were agreed to by management	13	5,398
- based on proposed management action	n/a	n/a
- based on proposed legislative action	n/a	n/a
(ii) Dollar value of recommendations that were not agreed to by management	14**	26,800
(iii) Dollar value of non-awards or unsuccessful bidders	18	86,190***
D. For which no management decision has been made by the end of the reporting period	41	131,578
Reports for which no management decision was made within six months of issuance	29	115,579

* Any difference in number of reports and amounts of questioned costs or recommended efficiencies between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

** Four of the reports were the same reports in items C(i) and C(ii). Only the related dollars disallowed were included in C(i), whereas the dollars which were not disallowed were included in C(ii).

*** This amount represents the dollar value of recommendations that funds be put to better use.

Resolution of Significant Reports						Resolution of Significant Reports					
Repoer Number / Report Date	Grantee / Contractor	Report Issuance		Report Resolution		Repoer Number / Report Date	Grantee / Contractor	Report Issuance		Report Resolution	
		FS Questioned / Recommended Efficiency		Federal Share to be Recovered / Sustained Efficiency				FS Questioned / Recommended Efficiency		Federal Share to be Recovered / Sustained Efficiency	
E2CWM0-02-0268 2200027 REPORT DATE 9/ 2/92	NORTH CASTLE NY	INEL 469,490 UNSP 0 UNUR 0 RCOM 0		INEL 469,489 UNSP 0 UNUR 0 SUST 0		E2CW*7-09-0192 1300053 REPORT DATE 3/28/91	SUN VALLEY WATER & SAN DIST NV	INEL 4,665,840 UNSP 0 UNUR 1,760,811 RCOM 0		INEL 296,105 UNSP 0 UNUR 1,760,811 SUST 0	
E2CWM1-02-0118 2200034 REPORT DATE 9/22/92	MIDDLESEX COUNTY NJ	INEL 264,500 UNSP 1,188,912 UNUR 0 RCOM 0		INEL 264,500 UNSP 564,049 UNUR 0 SUST 0		E2CWM0-09-0052 2200030 REPORT DATE 9/15/92	HAWAII COUNTY HI	INEL 5,218,260 UNSP 0 UNUR 0 RCOM 0		INEL 5,218,260 UNSP 0 UNUR 0 SUST 0	
P2BW*8-02-0268 2100450 REPORT DATE 7/ 5/92	NYC-OAKWOOD BEACH NY	INEL 304,715 UNSP 917,165 UNUR 0 RCOM 0		INEL 304,715 UNSP 917,165 UNUR 0 SUST 0		E2CWN0-09-0071 2300085 REPORT DATE 9/29/92	HONOLULU CITY & COUNTY, HI	INEL 1,292,855 UNSP 0 UNUR 4,516,290 RCOM 0		INEL 664,383 UNSP 0 UNUR 695,902 SUST 0	
P2CWL9-02-0019 2100328 REPORT DATE 4/16/92	WESTCHESTER COUNTY NY	INEL 1,766,797 UNSP 0 UNUR 0 RCOM 0		INEL 1,766,797 UNSP 0 UNUR 0 SUST 0		S2BWN1-09-0095 2300090 REPORT DATE 9/30/92	SAN FRANCISCO C&C SEWWTP CA	INEL 5,425,295 UNSP 0 UNUR 0 RCOM 0		INEL 5,425,295 UNSP 0 UNUR 0 SUST 0	
D8AML2-03-0406 2100534 REPORT DATE 8/28/92	BIONETICS VA	INEL 0 UNSP 0 UNUR 0 RCOM 2,646,339		INEL 0 UNSP 0 UNUR 0 SUST 672,643		P2CW*7-10-0104 2100303 REPORT DATE 3/31/92	OLYMPIA WA	INEL 778,712 UNSP 226,892 UNUR 0 RCOM 0		INEL 720,332 UNSP 0 UNUR 0 SUST 0	
E2AWT2-03-0603 2400084 REPORT DATE 9/30/92	EW PHILADELPHIA PA	INEL 0 UNSP 0 UNUR 0 RCOM 3,311,261		INEL 0 UNSP 0 UNUR 0 SUST 3,311,261		INEL = INELIGIBLE COST UNSP = UNSUPPORTED COST UNUR = UNNECESSARY/UNREASONABLE COST RCOM = RECOMMENDED EFFICIENCIES SUST = RECOMMENDED EFFICIENCIES SUSTAINED					
E2BWN1-04-0050 2300081 REPORT DATE 9/24/92	FT LAUDERDALE FL	INEL 1,475,976 UNSP 55,610 UNUR 0 RCOM 0		INEL 1,451,688 UNSP 55,610 UNUR 0 SUST 1,507,298							
P2CWP9-05-0072 2400023 REPORT DATE 3/12/92	WASHTENAW CO DPW (ANN ARBOR) MI	INEL 449,642 UNSP 0 UNUR 0 RCOM 0		INEL 449,642 UNSP 0 UNUR 0 SUST 0							
E3CLN1-06-0157 2300052 REPORT DATE 5/20/92	LUST COOPERATIVE AGREEMENTS OK	INEL 501,190 UNSP 7,891 UNUR 0 RCOM 0		INEL 408,632 UNSP 0 UNUR 0 SUST 0							
E2AWP2-09-0243 2400076 REPORT DATE 9/24/92	SAN DIEGO CA	INEL 0 UNSP 0 UNUR 0 RCOM 5,500,000		INEL 0 UNSP 0 UNUR 0 SUST 5,500,000							

Section 3—Prosecutive Actions

The following is a summary of investigative activities during this reporting period. These include investigations of alleged criminal violations which may result in prosecution and conviction, investigations of alleged violations of Agency regulations and policies, and OIG personnel security investigations. The Office of Investigations tracks investigations in the following categories: preliminary inquiries and investigations, joint investigations with other agencies, and OIG background investigations.

Summary Of Investigative Activities

Pending Investigations as of September 30, 1992	205
New Investigations Opened This Period	125
Investigations Closed This Period	137
Pending Investigations as of March 31, 1993	193

Prosecutive and Administrative Actions

In this period, investigative efforts resulted in 6 convictions and 6* indictments. Fines and recoveries, including those associated with civil actions, amounted to \$13.2 million. Eighteen administrative actions** were taken as a result of investigations:

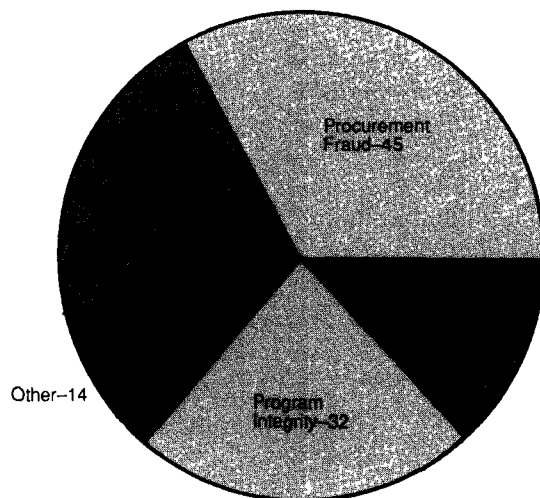
Reprimands	6
Resignations/Removals	5
Suspensions	3
Other	4
Total	18

* Does not include indictments obtained in cases in which we provided investigative assistance.

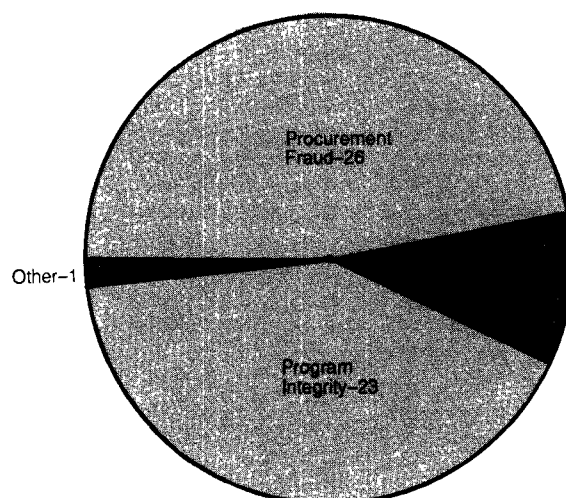
** Does not include suspensions and debarments resulting from Office of Investigations activities or actions resulting from reviews of personnel security investigations.

Profiles Of Pending Investigations By Type (Total-193)

General EPA Programs
Total Cases-138



Superfund And LUST
Total Cases-55



Description of Selected Prosecutive and Administrative Actions

Below is a brief description of some of the prosecutive actions which occurred during the reporting period. Some of these actions resulted from investigations initiated before October 1, 1992.

\$11.6 Million Settlement Reached in Pennsylvania Superfund Case

Chemical Waste Management (CWM), Inc., of Oak Brook, Illinois, reached an \$11.6 million settlement with the Government in October 1992, regarding the Lackawanna Refuse Superfund Site in Lackawanna County, Pennsylvania. The \$11.6 million in fines, penalties, restitution, and costs associated with the criminal and civil settlement to be paid by the company makes this the largest environmental crimes case ever prosecuted under the Superfund law.

The Lackawanna site was originally used for disposal of municipal and commercial refuse. In the late 1970's, thousands of 55-gallon drums containing hazardous substances such as solvents, paint thinners, sludge, organic acids and toxic metals were illegally dumped at the site. In June 1987, EPA, through the Army Corps of Engineers, awarded CWM a contract to clean up the site, specifying that all drums containing over one inch of material were to be carefully removed from the excavation area and placed in 85 gallon overpacks for shipment to qualifying landfill facilities.

CWM pleaded guilty to six felony violations of the Superfund law. CWM employees knowingly and intentionally crushed numerous drums containing over one inch of material in order to speed up the project. The hazardous substances contained in the drums leaked out into the environment and contributed to the contamination of the site. CWM failed to report this activity, in violation of the Superfund law.

In addition to the monetary settlement, CWM agreed to terminate and/or discipline six CWM employees; continue its newly instituted Contracts Compliance Program and Environmental Compliance

Program; subject itself to EPA audits for 3 years to ensure compliance with the agreement; and be subject to debarment if it fails to strictly adhere to its compliance program.

The Defense Criminal Investigative Service, U.S. Army Criminal Investigation Command, and Defense Contract Audit Agency assisted EPA OIG in developing this case.

Superfund Contract Laboratory Program Investigations

The Office of Investigations has a major investigative initiative underway within the Superfund program, directed at fraud in the Contract Laboratory Program (CLP). Laboratory analyses under the CLP are the empirical basis for the entire Superfund program. Based on testing for the presence of hazardous chemicals by these laboratories, the Superfund program decides which cleanups to initiate and how to carry them out. Fraudulent analyses could result in a danger to the public health and safety as well as the unnecessary expenditure of cleanup funds. In addition, fraudulent analyses could hinder the Department of Justice's efforts to collect the cost of cleanups from the responsible parties.

Several actions resulting from the contract lab investigations are described below.

I-Chem Research and Its President Sentenced in Contaminated Container Case

I-Chem Research, Inc., and Anita C. Rudd, its president, chief executive officer, and a principal owner, were sentenced in February 1993 after pleading guilty to making a false claim to EPA for \$35,000. Also, in October 1992, Marvin W. Rudd, a co-owner and former president of the California research

company, pleaded guilty to two counts of making false claims to the Agency, totaling approximately \$50,000.

The sentence against Anita Rudd was suspended and she was placed on three years probation. The conditions of her probation require that she pay a \$50,000 fine and a \$50 assessment. The sentence against I-Chem was suspended, the company was placed on three years probation, and is required to pay a \$100,000 fine and a \$100 assessment. These fines are in addition to the \$435,000 that defendants Anita Rudd, Marvin Rudd, and I-Chem previously agreed to pay the Department of Justice as part of a settlement of civil claims related to the case. I-Chem and Anita Rudd had also agreed to an 18 month voluntary exclusion from participating in Government contracts or grants.

From June 1983 until December 1987, the company, as EPA's sole supplier under contract, was required to provide clean, contaminant-free sample containers for laboratory use, and to perform quality control testing on the containers. The sample containers were used to collect site samples for laboratory analysis under EPA's Contract Laboratory Program.

The investigation found that the company had defrauded EPA by intentionally failing to perform the required testing and by creating records to disguise that fact.

EIRA Inc. of Louisiana Pleads Guilty to Fraud

Environmental Industrial Research Associates, Inc. (EIRA), a Louisiana corporation, was sentenced in March 1993 after pleading guilty to conspiracy to defraud the Government. EIRA was fined \$174,000, which was suspended, and placed on 5 years probation. As a condition of its suspended fine EIRA must implement a 2-year community service program consisting of at least 24 seminars in Louisiana,

Mississippi, and North Carolina to increase industry and public awareness of problems associated with the quality of analytical data produced by laboratories. Also, EIRA must prepare and publish a comprehensive article to assist the national laboratory community in implementing a suitable data integrity and self-audit program.

In conjunction with the criminal sentence, EIRA also entered into a compliance agreement with EPA (see page 29).

EIRA and three of its employees pleaded guilty to making false claims to EPA for analyses of soil and water samples taken from Superfund sites. EPA requires the use of properly calibrated Gas Chromatograph/Mass Spectrometer (GC/MS) instruments in making the analyses. EIRA, through the employees who pleaded guilty, manually overrode the GC/MS instruments' calibration readings to falsely reflect that the instruments were properly calibrated. By doing so, EIRA avoided the time-consuming process of recalibration. However, the analytical results that EIRA then reported to EPA, and for which EIRA billed the Agency, were compromised, resulting in EIRA's submission of false data and false claims.

Two New York Lab Supervisors Sentenced

Two supervisors at Nanco Environmental Services, Inc., of Dutchess County, New York, have been sentenced for submitting false test reports to EPA on analyses of soil and water samples. The scheme involved setting back the dates on the computer data systems attached to Gas Chromatograph/Mass Spectrometer instruments to make it appear that laboratory analyses were performed within EPA-approved holding times when, in fact, they were not. Sohail Jahani, who pleaded guilty in May 1992 to conspiracy to defraud EPA,

was sentenced to 3 years probation, ordered to perform 100 hours of community service, and fined \$5,000. James Daly, another supervisor at Nanco, who pleaded guilty in October 1991 to causing false submissions to be made to EPA, received 1 year of probation and was fined \$50.

Other Cases

False Credentials Result In Jail Time

After pleading guilty to submitting false statements to EPA, Christopher Tate, of Altoona, Pennsylvania, an owner of the Safety Management Institute (SMI), was sentenced in January 1993 to 2 years probation and fined \$3,000. Tate was also sentenced to jail for ten consecutive weekends.

Tate submitted two resume packages to EPA, Region 3, in which he falsely claimed both to be a Certified Industrial Hygienist and to hold a Bachelor of Science degree in chemistry. The falsified information was submitted to the Agency so that SMI could be approved as a training center under the Asbestos Abatement Training Program.

Contractor Employee Charged with Telephone Abuse

An employee of a contractor at Region 5 in Chicago has been charged with making over \$3,600 in personal overseas telephone calls at Government expense. The case was developed by the EPA OIG in cooperation with the Federal Protective Service Division of the General Services Administration and the U.S. Immigration and Naturalization Service.

Office Director at Headquarters Indicted

An EPA Headquarters office director was indicted in March 1993 and charged with conspiracy, bank fraud, filing

false income tax returns, money laundering, and making false statements to Federal agents.

The EPA OIG investigation grew out of an OIG Hotline complaint on an unrelated matter. Information developed during the investigation of this complaint led to evidence of possible criminal violations.

This case was investigated jointly by agents of the Internal Revenue Service, the Federal Bureau of Investigation, the Defense Criminal Investigative Service, Department of Defense Inspector General, the United States Postal Inspection Service, and the EPA OIG.

Headquarters Employee Guilty in Jury Duty Scam

In November 1992, an EPA Headquarters employee pleaded guilty of submitting false statements and theft of government property. In January 1993, the employee was sentenced to 2 years probation. As a special condition to the probation, she was ordered to serve 3 months in jail and pay EPA restitution of \$5,960.

The investigation by the OIG determined that, in late 1991, the employee received a notice for jury duty for 2 weeks. The employee altered the form so that it appeared that she would be needed for 6 months of jury service in 1992. The Agency excused the employee from work for 6 months with pay, when, in fact, the employee actually served on a petit jury for only seven days and took four months off from work, receiving nearly \$6,000 in salary during that time. The woman's employment at EPA has been terminated.

Chicago Employee Convicted in Time Card Fraud Case

An EPA Region 5 employee in Chicago resigned in March 1993, after her August 1992 conviction in Cook County Circuit Court on a misdemeanor theft charge, in

addition to her admission to falsifying her time card.

The employee, a division secretary responsible for obtaining cash travel advances and airline tickets for official travel by division staff, stole portions of their cash advances. The secretary altered the office copy of the travel authorizations to reflect that less than the full advance was approved and disbursed by the Region 5 imprest cashier. The employee also falsified one of her time cards by deleting 20 hours charged to annual leave.

As a result of the guilty plea in the county court, the employee was sentenced to 1 year of court supervision.

Contract Specialist Loses Job

In October 1992, a contract specialist was terminated from employment with EPA based on her falsification of information on two SF-171's, Application for Federal Employment, submitted to the Agency.

The investigation determined that the employee failed to disclose a prior felony conviction for defrauding an insurance company in Florida. In addition to the undisclosed criminal record, there was an outstanding warrant for her arrest issued after she failed to appear for sentencing following the felony conviction.

Civil and Administrative Actions to Recover EPA Funds

Investigations and audits conducted by the Office of Inspector General provide the basis for civil and administrative actions to recover funds fraudulently obtained from EPA. Through the Inspector General Division (IGD) of the Office of General Counsel, the OIG uses a variety of tools to obtain restitution. These include cooperative efforts with the Department of Justice in filing civil suits under the False Claims Act, the Program Fraud Civil Remedies Act, and other authorities; working with grantees using their own civil litigation authorities; invoking the restitution provisions of the Victim and Witness Protection Act during criminal sentencing; using the Agency's authority to administratively offset future payments and to collect debts; and negotiating voluntary settlements providing for restitution in the context of suspension and debarment actions. Civil and administrative actions to recover funds usually extend over several semiannual reporting periods.

Two Testing Firms Agree to Pay Government

ChemWest Analytical Laboratories

The IGD, working with EPA's Office of Regional Counsel for Region 9 and the United States Attorney's Office for the Eastern District of California, finalized a civil settlement agreement with ChemWest Analytical Laboratories, Inc. (ChemWest). Under the agreement ChemWest paid \$500,000 to resolve the

Government's allegations that ChemWest had engaged in fraudulent data manipulation.

Environmental Industrial Research Associates

Working with EPA's Suspension and Debarment Division, the IGD negotiated a compliance agreement with Environmental Industrial Research Associates, Inc. (EIRA) as part of the global resolution of a laboratory fraud case. Under the compliance agreement EIRA agreed to repay EPA approximately \$160,000, which includes approximately \$56,000 for the Office of Inspector General's costs of investigating EIRA's fraud. Under the compliance agreement EIRA is obligated to make full restitution to EPA, enforce its data integrity program, provide ethics training to all laboratory employees involved in data analysis, employ a full-time compliance officer, and establish a hotline to receive anonymous reports of violations. EIRA's promise to make restitution of approximately \$160,000 has been made part of EIRA's criminal sentence.

Section 4—Fraud Prevention And Management Improvements

This section describes several activities of the Office of Inspector General to promote economy and efficiency and to prevent and detect fraud, waste, and abuse in the administration of EPA programs and operations. This section includes information required by statute, recommended by Senate report, or deemed appropriate by the Inspector General.

Review of Legislation and Regulations

Section 4(a)(2) of the Inspector General Act of 1978, as amended, directs the Office of Inspector General to review existing and proposed legislation and regulations relating to Agency programs and operations to determine their effect on economy and efficiency and the prevention and detection of fraud and abuse. During this semiannual reporting period, we reviewed one legislative and 68 regulatory items. The most significant items reviewed are summarized below.

Proposed Regulatory Flexibility Amendments Act of 1993 (H.R. 830)

We reviewed and commented on the Small Business Administration's (SBA) draft position on H.R. 830, the proposed Regulatory Flexibility Amendments Act of 1993.

The Regulatory Flexibility Act of 1980 (Act) requires Federal agencies to consider the economic impact their regulations will have on small entities. Under the Act's provisions, agencies are required to conduct a regulatory flexibility analysis if a rule will have a significant economic impact on a substantial number of small entities so that alternatives can be considered to accomplish the objectives of the applicable statutes while minimizing the cost to small businesses. SBA maintains that, although the Act has helped to assure that the effect of new rulemakings on small business is properly considered, often the burdens on small entities have either been underestimated or ignored since there is no enforcement mechanism in the Act.

To address this concern, H.R. 830 would require agencies to work more closely with the SBA's Chief Counsel for Advocacy, who is responsible for monitoring compliance with the Act, by requiring agencies to transmit a copy of any proposed rule 30 days prior to publication in the *Federal Register*, along with a copy of the initial regulatory flexibility analysis for the rule or an explanation of a determination that such an analysis is not required. If the Chief Counsel transmits to the agency a written statement of opposition to the proposed rule within 15 days, the agency must publish that statement, together with its response, in the *Federal Register* at the same time the notice of proposed rulemaking is published. In our opinion, this procedure would likely lead to increased litigation, since it would provide potential litigants information to block or delay proposed rules. Accordingly, we recommended that the proposed legislation contain language specifying a mechanism for resolving interagency differences, if possible, prior to a rule's publication.

In addition, the SBA's draft position referred to the lack of an "enforcement mechanism" for addressing the concerns of small businesses under the current legislation. We recommended that SBA's comments specifically describe how the proposed legislation resolves this concern.

Proposed Amendment to EPA Order 1900.1, Use of Contractor Services

The purpose of EPA Order 1900.1 is to assist EPA personnel in avoiding personal services arrangements in contract management activities. Unless specifically allowed by the Congress, it is illegal for the Government to contract out for the services of people who in the course of their work are treated as if they were Government employees. EPA Order 1900.1 explains the nature of a personal services contract and the duties and responsibilities of EPA employees to ensure that such relationships are avoided.

The proposed amendment includes specific guidelines for communications between Agency and contractor employees and requirements concerning space and equipment for contractors working in EPA facilities. We supported the intent of the amendment, but were concerned that distribution of the guidance would be limited to EPA employees only. Accordingly, we recommended that guidance concerning contractor employees be distributed to the contractor community, since these requirements will clearly affect them in the everyday performance of their duties.

PCIE Whistleblower Guide

The PCIE's Investigative Standards and Training Subcommittee's Hotline Working Group developed a proposed guide to processing whistleblower reprisal allegations. The document outlined current legislation pertaining to whistleblowers, the purpose of such legislation, and how it should be implemented. It is essentially an implementing guide for the development of draft standard operating procedures for agency hotlines.

The whistleblower paper offered guidelines for the handling of allegations of reprisal, and indicated that the processing of such complaints is governed by the employee status of each complainant. While the paper provided information on the statutes and implementing agency guidelines that are in force to protect whistleblowers in various employment capacities (non-federal employees, appropriated and non-appropriated fund employees, military personnel, and DOD contractor employees) and the procedures to be taken in each instance, it was still essentially general in nature.

We generally agreed with the paper's approach to handling hotline calls, with the following reservations. We were concerned about an apparent discrepancy between language in the paper which stated that non-Federal employees have no statutory protection against reprisals and an attachment that lists several statutes designed to protect public or private employees from reprisal. We recommended a correction or clarification of this issue. In addition, the procedures outlined for processing referrals of appropriated fund employees were somewhat unclear. We suggested modifying the language and revising the format of that section to avoid confusion among those handling such calls.

Suspension and Debarment Activities

EPA's policy is to do business only with contractors and grantees who are honest and responsible. EPA enforces this policy by suspending or debaring contractors or grantees from further EPA contracts or assistance if there has been a conviction of, or civil judgment for:

- *commission of a fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public contract or subcontract;*
- *violation of Federal or State antitrust statutes relating to the submission of offers;*
- *commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making a false statement, or receiving stolen property; or*
- *commission of any other offense indicating a lack of business integrity or business honesty that seriously and directly affects the present responsibility of a Government contractor or subcontractor.*

A contractor may also be debarred for violating the terms of a Government contract or subcontract, such as willful failure to perform in accordance with the terms of one or more contracts, or a history of failure to perform, or of unsatisfactory performance on one or more contracts. A contractor may also be debarred for any other cause of so serious or compelling a nature that it affects the present responsibility of the contractor. Thus, a contractor need not have committed fraud or been convicted of an offense to warrant being debarred. Debarments are to be for a period commensurate with the seriousness of the

cause, but are generally not to exceed 3 years.

The effectiveness of the suspension and debarment (S&D) program has been enhanced by regulations that provide all Federal agencies a uniform system for debaring contractors from receiving work funded by Federal grants, loans, or cooperative agreements. The system, required by Executive Order 12549, provides that a nonprocurement debarment or suspension by one agency is effective in all agencies and requires the General Services Administration (GSA) to publish monthly a "List of Parties Excluded from Federal Procurement or Nonprocurement Programs." Formerly, a nonprocurement debarment was effective only in the programs administered by the debarring agency, and each agency maintained its own list. The EPA Office of Grants and Debarment (OGD) operates the S&D program at EPA. The OIG assists the EPA S&D program by providing information from audits, investigations, and engineering studies; and obtaining documents and evidence used in determining whether there is a cause for suspension or debarment.

The OIG's Suspension and Debarment Unit works with OGD to further educate and inform State and local governments and environmental interest groups about the effective use of suspensions and debarments.

During this period, cases with direct OIG involvement led to 12 suspensions, 19 debarments and 6 compliance agreements, a total of 37 actions.

The following are examples:

- At the request of EPA's Office of General Counsel (OGC), Inspector General Division (IGD), EPA suspended Caribe General Constructors, Inc. (Caribe); Osvaldo J. Ortiz, its president; and Jose M. Bonnin, its vice president for operations. An OIG investigation indicated

that Caribe had submitted false claims to EPA in connection with the construction of an EPA-funded sanitary sewer system in Ponce, Puerto Rico.

- Stevens Analytical Laboratories, Inc. (SAL) and a related company, Stevens Environmental Technology, Inc. (SET), under an agreement negotiated by OGC's IGD, voluntarily consented to debarment from participation in Federal assistance, loan, and benefit programs and activities for 3 years. SAL and SET had previously been suspended, based on an indictment of SAL and its president, Alan Stevens, for providing false and fictitious analyses of drinking water and waste water samples. Further, based on Alan Stevens' conviction for mail fraud, EPA proposed to debar Mr. Stevens, who had previously been suspended by EPA.

- Robert Q. Bradley was debarred by EPA for 3 years following his conviction for making false statements. His 2 year prison sentence was suspended, but he was fined \$1,000. Mr. Bradley made false certifications on a contract laboratory program data package which indicated that water samples for EPA were analyzed within a prescribed holding time. Some of the samples whose holding times had expired had been analyzed on testing instruments that had been backdated to make it appear that the samples had been analyzed within the prescribed holding time.

- Pipex Inc., and C. Square Inc., of Kansas, along with James and Elizabeth O'Connor, were debarred by EPA for 3 years. The O'Connors formed Pipex to sell materials used in the construction of municipal water systems and wastewater treatment plants. At the time the O'Connors formed Pipex, James O'Connor was under

contract to sell water works materials exclusively for Midwest Pipe Fabrications Inc. O'Connor bid against Midwest on EPA-funded projects, using bribes and confidential information he obtained as a salesman for Midwest. A civil judgment was entered against Pipex Inc. and the O'Connors for violation of the Racketeer Influenced and Corrupt Organization Act. As a result, James O'Connor was held liable for damages of \$745,500, and the O'Connors and Pipex were held jointly and severally liable for \$325,000.

- EPA debarred Ivan Clay Kimbrough for 3 years. Mr. Kimbrough, a contract computer operator assigned to the Information Management Branch, Office of Policy and Management, EPA Region 4, pleaded guilty of violating the Georgia Racketeer Influenced and Corrupt Organization Act and was sentenced to 5 years in jail.

- EPA debarred Carol H. Byington, Executive Vice President and Chief Operating Officer of MetaTrace Inc., for 7 years. Initially MetaTrace, located in Earth City, Missouri, reported a limited falsification of test data by first line supervisors and a small number of technicians working in the gas chromatograph laboratory. Laboratory personnel had falsified and fraudulently submitted computer-generated test data on pesticides/polychlorinated biphenyls to EPA. Also, pesticides analyses for certain samples submitted to EPA were not performed in compliance with the protocols required by EPA contracts. Evidence showed the company normally falsified test data, and Ms. Byington instructed supervisors on falsifying test data and records. She was convicted of making false statements and representations.

Congressional Testimony by the Inspector General

On March 29, 1993, the IG testified before the Subcommittee on Legislation and National Security and the Subcommittee on Environment, Energy and Natural Resources, House Committee on Government Operations, on elevating EPA to cabinet level status. While fully supporting this initiative, the IG discussed significant problems confronting EPA in its management of extramural resources (contracts, cooperative agreements, and interagency agreements), information resources management, financial management, and internal control systems. The IG stated that these areas of concern were not in need of new legislation as a remedy. In his view, the Chief Financial Officers Act, the Federal Managers' Financial Integrity Act, the Federal Grant and Cooperative Agreement Act, the Competition in Contracting Act, Office of Management and Budget circulars, and EPA regulations provide sufficient legislative authorities and administrative guidance that a strong EPA management team can use successfully to address the problems.

OIG Management Initiatives

This section discusses OIG initiatives to promote management and financial improvements and integrity in EPA's operations. During this semiannual period, we are highlighting OIG efforts to conduct financial audits of EPA contracts.

Expansion of Audit Program of Contractors

The OIG continued to implement its long-term program for conducting financial audits of EPA contracts during this semiannual period. Two new branch offices were established while the OIG continued to conduct significant financial audits of the 14 contractors over which it has cognizance and work with DCAA to reduce audit backlog. The OIG also worked with the Office of Management and Budget (OMB), EPA's Office of Acquisition Management (OAM), and other Federal agencies to complete the OMB SWAT Team effort on civilian agency contracting, implement the recommendations of the EPA SWAT Team, and improve the Federal Acquisition Regulation which governs Government contracting.

The OIG established branch offices in the Cincinnati, OH, and Washington, DC, areas to perform financial audits of EPA contractors. Both offices will have OIG staff on-site at major EPA contractor facilities. The Cincinnati, OH, office will also include performance auditors. Close coordination between financial and performance auditors will enhance reviews of EPA operations by helping ensure that contracting activities are efficiently covered in those audits. The new offices will also facilitate close coordination between auditors and investigators and thereby enhance the efficiency of

reviews of potentially fraudulent activities.

The OMB SWAT Team report was completed with the participation of the OIG in the project management group. The EPA SWAT Team, composed of representatives of EPA OAM and the OIG, developed 38 of the 115 Government-wide and 41 of a total 136 Agency-specific recommendations presented in the OMB SWAT Team report. The Government-wide recommended improvements include changes to the Federal cost principles governing employee morale and entertainment costs, insurance costs and contingent fees. The corrective actions identified will significantly improve Federal cost principles and EPA cost review procedures. The OIG assisted EPA OAM in the development and implementation of its action plan to address the issues identified in the EPA SWAT Team report. OIG involvement in Government contracting has also included commenting on contemplated changes to the Federal Acquisition Regulation concerning service contracting and Cost Accounting Standards coverage thresholds.

OIG Training Catalog

To help OIG supervisors identify and select appropriate development opportunities for members of their staffs, we have issued the FY 1993 edition of the OIG training catalog. This catalog describes national CPA training sources, lists video tapes available, and provides schedules of over 97 courses that are included in the OIG career profiles for auditors, investigators, and support staff. For the first time, the catalog was provided to the field offices on a diskette.

Total Quality Management

The Office of Inspector General has adopted the management philosophy known as Total Quality

Management (TQM). A Quality Council consisting of the Deputy Inspector General, the three Assistant Inspectors General, and the Quality Coordinator directs the TQM process within the OIG. Also, the Deputy Inspector General participates as a member of EPA's Deputy Leadership Team. Quality Action Teams (QAT) have been established within OIG to improve training, recruiting, data gathering and sharing, and processing of interagency agreements. During this reporting period, a new QAT was created to examine the distribution of administrative and secretarial assignments. In addition to the teams within OIG, OIG employees are members of Headquarters and Regional Quality Action Teams seeking to improve processes such as performance management, employees recognition and awards, audit followup, procurement, and implementation of the Chief Financial Officers Act.

During this reporting period OIG's TQM facilitators provided 1-day awareness training in Dallas, Texas, for 10 employees, and 2-day TQM "tools" training to 33 OIG members of Quality Action Teams.

President's Council on Integrity and Efficiency

The Office of Inspector General participates in the activities of the President's Council on Integrity and Efficiency (PCIE), which was established by Executive Order 12301 in March 1981 to attack fraud and waste, and to improve management in the Federal Government. The PCIE was re-established by Executive Order 12805 on May 11, 1992. The PCIE coordinates interagency activities involving common issues, and develops approaches and techniques to strengthen the effectiveness of the entire Inspector General community. The PCIE is headed by the Deputy Director for Management, Office of Management and Budget (OMB), and includes all civilian Presidentially appointed Inspectors General and other key Federal officials.

Inspector General John C. Martin chairs the Internal Operations Committee of the PCIE. During this six month period, the Committee completed the transfer of responsibility for distribution of PCIE publications to the National Technical Information Service (NTIS) of the Department of Commerce.

NTIS is the largest single source for public access to federally-produced information. It provides a centralized information management system that can store, process, and distribute publications. The cost of each publication ordered from NTIS is paid for by the requestor. An advantage of using NTIS to distribute PCIE publications is that they will be made permanently available and become part of the NTIS computerized bibliographic

database. NTIS believes that PCIE publications may be of interest to a wide untapped audience.

The second symposium for Assistant Inspectors General for Administration was held in November 1992. The topic was "Contracting for Audit Support." This symposium, conducted under the auspices of the Internal Operations Committee, provides an opportunity to exchange ideas, problems, and solutions regarding many administrative issues of common interest.

Committee on Integrity and Management Improvement

The Committee on Integrity and Management Improvement (CIMI) was established in 1984 by EPA Order 1130.1. The purpose of CIMI is to coordinate the Agency's effort to minimize the opportunities for fraud, waste, and mismanagement in EPA programs and to advise the Administrator on policies to improve the efficiency and effectiveness of EPA programs and activities. The Committee is composed of senior EPA program and regional officials and is chaired by the Inspector General.

A Brief Guide for New Executives

As Federal employees, executives represent the Government to many people and their actions must always be beyond reproach. To guide them in this effort, a significant number of rules have been developed. To actively promote the highest degree of integrity in EPA, the CIMI developed a booklet designed to briefly cover many of the main areas on which executives need to focus their attention. The booklet discusses standards of conduct, financial disclosure requirements, prohibited use of personnel, employment principles, contract management, the procurement of products and services, and travel policies and regulations. The booklet highlights the need for executives to comply with the rules to ensure that Government business is conducted properly, and that the high ethical standards of public service are met.

Hotline Activities

During this period, the Hotline was part of President Clinton's efforts to "reinvent" the Government by serving as a collection point for the ideas of American citizens. This initiative requests the public to directly participate by calling IG Hotlines to make suggestions for improving the Government and saving money. Attended operating hours were expanded to serve the needs of the public.

During this period, the Hotline referred 4,587 telephone callers to the appropriate EPA program office, State agency, or other Federal agency for assistance. The OIG Hotline opened 36 new cases and completed and closed 31 cases. Of the cases closed, 8 resulted in environmental, prosecutive, or administrative corrective action, while 23 did not require action. Cases that did not have immediate validity due to insufficient information may be used to identify trends or patterns of potentially vulnerable areas for future review. The following are examples of corrective action taken as a result of information provided to the OIG Hotline.

- A complainant alleged that an inspector for a State agency used undue influence to secure a subcontract on an EPA-funded project for a company in which the inspector had a financial interest. In addition, the complainant stated that the inspector falsified records so that the company could obtain funds in excess of the contract price. A review of the complaint disclosed violations which resulted in the State taking action against three individuals. The inspector resigned rather than be terminated, another State official was suspended without pay for 8 weeks, and a third State official pleaded guilty to a misdemeanor and was

suspended without pay for 12 weeks.

- A complainant alleged that an employee inflated two local travel claims and received payment. A review of the complaint disclosed that the employee had submitted 2 fraudulent local travel claims. As a result, the employee was liable under the Program Fraud Civil Remedies Act and was penalized 10 times the amount of the fraud.

- A complainant alleged that a company was fraudulently violating vehicle emission and safety laws. A review of the complaint disclosed that the company had tampered with emission control equipment. As a result, a notice of violation was issued to the company for 11 tampering violations and the company was fined \$16,500.

Personnel Security Program

The personnel security program is one of the Agency's first-line defenses against fraud. The program uses background investigations and National Agency Checks and Inquiries to review the integrity of EPA employees and contractors. During this semiannual reporting period, the Personnel Security Staff reviewed 455 investigations.

Appendix 1—Reports Issued

THE INSPECTOR GENERAL ACT REQUIRES A LISTING, SUBDIVIDED ACCORDING TO SUBJECT MATTER, OF EACH REPORT ISSUED BY THE OFFICE DURING THE REPORTING PERIOD AND FOR EACH REPORT, WHERE APPLICABLE, THE DOLLAR VALUE OF QUESTIONED COSTS AND THE DOLLAR VALUE OF RECOMMENDATIONS THAT FUNDS BE PUT TO BETTER USE.

Assignment Control Number	Title	Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
			Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
1. INTERNAL & MANAGEMENT ASSIGNMENTS						
<u>Office of the Administrator</u>						
E1SFF2-11-0019-3100095	SUPERFUND REPORT TO CONGRESS FISCAL 1991	2/ 4/93				
E6AMG2-13-2052-3400035	PROCUREMENT ACTIVITIES BY OFFICIALS IN THE OFFICE OF COMMUNICATION, EDUCATION AND PUBLIC AFFAIRS	3/26/93				
E6AMG3-15-0071-3400042	OFFICE OF COMMUNICATION, EDUCATION AND PUBLIC AFFAIRS COMPLIANCE WITH FEDERAL COPYRIGHT LAWS PROTECTING COMPUTER SOFTWARE	3/31/93				
<u>Assistant Administrator for Administration and Resources Management</u>						
E1XMG3-24-0024-3400024	EPA'S ENERGY MANAGEMENT AND CONSERVATION PROGRAM	2/22/93				
E1XMG3-03-0044-3400029	NEW RESTRICTIONS ON LOBBYING	3/ 8/93				
E1MXG2-13-0046-3400033	EPA'S ADMINISTRATION OF THE FEDERAL EMPLOYEES' COMPENSATION ACT	3/24/93				
E1AMP2-20-0019-3400039	OIL SPILL TRUST FUND FISCAL 1992	3/29/93				
P1SFF1-11-0027-3100058	DECADE OF SUPERFUND TRUST FUND AUDITS	1/ 4/93				
E1SKC1-06-0123-3100143	MANAGEMENT OF SUPERFUND SUPPORT CONTRACTS	3/26/93				
P1SFF0-11-0041-3100114	EPA'S SUPERFUND INDIRECT COST RATES FOR FISCAL YEARS 1987 AND 1988	2/24/93				
<u>Assistant Administrator for Solid Waste and Emergency Response</u>						
E1SJE2-02-0063-3100152	CAPPING REPORT ON WHETHER EPA HAS MAXIMIZED THE USE OF POTENTIALLY RESPONSIBLE PARTIES TO EFFECT SUPERFUND SITE CLEANUPS	3/31/93				
<u>Assistant Administrator for Prevention, Pesticides and Toxic Substances</u>						
E1EPF2-06-6131-3100097	PESTICIDES IMPORTS PROGRAM FOLLOWUP REVIEW	2/10/93				
E1EPG2-05-6008-3400030	EPA'S EMERGENCY SUSPENDED AND CANCELED PESTICIDES PROGRAM FOLLOWUP REVIEW	3/26/93				
E1EPP2-15-7001-3400043	EDP INTERNAL CONTROLS FOR SELECTED PESTICIDE REVOLVING FUNDS INFORMATION SYSTEMS	3/31/93				

Assignment Control Number	Title	Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
			Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
<u>Assistant Administrator for Research and Development</u>						
E1XMG2-04-0102-3400007	CONTRACTING ACTIVITIES AT ORD'S ATHENS LAB	11/30/92				
E1BMG2-01-0372-3400006	CONTRACTING ACTIVITIES AT ORD'S NARRAGANSETT LAB	12/ 2/92				
E1JBG2-10-0080-3400019	CONTRACTING ACTIVITIES AT ORD'S CORVALLIS LAB	2/ 3/93				
E1JBP3-24-0019-3400025	CONTRACTING ACTIVITIES AT ORD'S AEERL LAB	2/26/93				
E1JBG2-09-0329-3400041	CONTRACTING ACTIVITIES AT ORD'S EMSL LAB	3/31/93				
E1JBF2-04-0300-3100156	ORD'S ATHENS LAB MANAGEMENT OF EXTRAMURAL RESOURCES	3/31/93				
E6ABF2-11-0032-3100153	ORD'S USE OF COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENTS	3/31/93				
<u>Office of the Comptroller</u>						
E1RMG2-11-0052-3400023	EPA 1992 FMFIA ACTIVITIES	2/19/93				
<u>Office of Acquisition Management</u>						
E1BMF2-11-0050-3100089	ADVISORY AND ASSISTANT CONTRACTS	1/29/93				
<u>Regional Administrator, Region 3</u>						
E1HWF1-03-0339-3100111	PROJECT CERTIFICATION PROGRAM OF WASTEWATER TREATMENT PLANTS - REGION 3	2/23/93				
E6ASG3-03-0023-3400003	RCRA ENFORCEMENT ACTION	11/ 9/92				
<u>Regional Administrator, Region 7</u>						
E1RMF2-07-0134-3100148	FMFIA ACTIVITIES - REGION 7	3/30/93				
<u>Regional Administrator, Region 1</u>						
E1HWF2-01-0100-3100035	ESTUARY PROGRAM - REGION 1	11/18/92				
E1HWG3-01-0023-3400034	ENFORCEMENT OF THE SURFACE WATER TREATMENT RULE	3/25/93				
<u>Regional Administrator, Region 2</u>						
E1HWD3-02-0018-3400010	SAFE DRINKING WATER ACT PRIMACY ACTIVITIES - REGION 2	12/22/92				
E1SJG2-02-5000-3400005	POST-SETTLEMENT FOLLOWUP	11/24/92				
<u>Regional Administrator, Region 8</u>						
E1SGG2-14-0016-3400018	WHITEWOOD CREEK RI/FS REVIEW	1/28/93				
<u>Regional Administrator, Region 10</u>						

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
E6EWN2-10-0020-3300012	REVIEW OF ALASKA'S SAFE DRINKING WATER ACT ACTIVITIES		2/10/93				
TOTAL INTERNAL & MANAGEMENT AUDITS = 32							
2. CONSTRUCTION GRANT AUDITS							
D2CWL3-01-0116-3100140	CONCORD	NH	3/24/93				
S2CWL0-01-0130-3100030	MWRA	MA	11/17/92	184,928	0	0	
S2CWL0-01-0293-3100098	CONCORD	MA	2/10/93	77,041	0	0	
TOTAL OF REGION 01 = 3				261,969	0	0	
D2CWL3-02-0030-3100021	NYCDEP - NORTH RIVER	NY	11/ 3/92	19,447	721,541	0	
D2CWL3-02-0031-3100022	NYCDEP - OAKWOOD BEACH	NY	11/ 3/92	24,693	0	0	
E2CWM1-02-0018-3200002	PAWLING JT SEWER	NY	11/ 2/92	1,534,439	0	0	
E2CWM0-02-0275-3200003	FALLSBURG	NY	11/17/92	2,495,355	0	0	
E2CWM1-02-0011-3200009	ONONDAGA	NY	12/17/92	344,247	0	0	
E2CWM0-02-0300-3200010	TRI-MUNICIPAL SEWER	NY	12/22/92	1,649,932	0	0	
E2CWM1-02-0010-3200013	THOMPSON	NY	1/28/93	958,042	4,642	0	
E2CWM1-02-0087-3200043	SAUGERTIES	NY	3/29/93	688,654	170,607	0	
E2AWT3-02-0016-3400002	EARLY WARNING-RED HOOK WPCP	NY	10/28/92				89,663
P2EWQ1-02-0104-3100118	NYCDEP	NY	3/ 2/93	1,337,198	6,380,330	0	
TOTAL OF REGION 02 = 10				9,052,007	7,277,120	0	89,663
P2CWM9-03-0363-3200041	BALTIMORE MAYOR & CTY COUN	MD	3/25/93	779,784	30,949	0	
P2CWN9-03-0019-3300003	HOPEWELL CITY OF	VA	11/ 4/92	588,283	326,419	0	
P2CWN0-03-0412-3300005	ALLEGHENY CTY SANI DIST	MD	11/10/92	378,702	1,678,345	0	
P2CWN0-03-0104-3300013	PARKERSBURG CITY OF	WV	2/10/93	1,856,114	0	0	
P2CWN9-03-0256-3300026	BALTIMORE MAYOR & CTY COUN	MD	3/25/93	2,375,318	547,877	0	
TOTAL OF REGION 03 = 5				5,978,201	2,583,590	0	
E2CWM2-04-0425-3200001	HUNTSVILLE	AL	10/27/92	184,224	0	0	
E2CWM2-04-0160-3200035	PRICHARD	AL	3/ 9/93	36,829	0	0	
E2CWM2-04-0417-3200036	GREENVILLE	AL	3/17/93	19,666	0	0	
E2CWM3-04-0054-3200037	ANDALUSIA	AL	3/19/93	34,902	0	0	
E2CWM2-04-0289-3200038	UNION SPRINGS UTIL. BOARD	AL	3/19/93	63,069	0	0	
E2CWM2-04-0320-3200039	OZARK UTILITIES BOARD	AL	3/19/93	50,332	0	0	
E2CWM3-04-0085-3200040	ANNISTON WWSB	AL	3/24/93	122,944	0	0	
E2CWM3-04-0033-3200042	CULLMAN	AL	3/26/93	87,692	0	0	
E2CWN1-04-0417-3300006	GARNER	NC	11/23/92	479,707	2,375,049	0	
E2CWN0-04-0399-3300015	FT LAUDERDALE	FL	2/18/93	8,743	136,516	367,177	
P2CWN0-04-0392-3300011	ORLANDO	FL	2/ 4/93	2,914,127	0	0	
TOTAL OF REGION 04 = 11				4,002,235	2,511,565	367,177	
E2CWL3-05-0121-3100141	CLEVELAND NEORS	OH	3/26/93	1,157,669	9,041,738	27,664,633	
P2CWP7-05-0079-3400038	FLINT	MI	3/29/93	891,778	189,244	11,640	
TOTAL OF REGION 05 = 2				2,049,447	9,230,982	27,676,273	
E2CWN1-06-0139-3300014	ST TAMMANY PARISH SEW DIS 7	LA	2/17/93	0	17,852	133,350	
E2CWN1-06-0155-3300025	KENNER	LA	3/24/93	962,313	22,697	0	
P2CWN2-06-0088-3300024	TULSA	OK	3/19/93	0	11,320	175,026	
TOTAL OF REGION 06 = 3				962,313	51,869	308,376	
P2CWN2-07-0183-3300027	DES MOINES	IA	3/29/93	74,328	0	0	
P2BWN2-07-0184-3300029	DES MOINES	IA	3/29/93	60,635	200,209	0	
TOTAL OF REGION 07 = 2				134,963	200,209	0	
E2CWN1-08-0095-3300009	LAPLATA COUNTY	CO	1/29/93	163,574	74,742	0	
E2CWN7-08-0139-3300028	CASPER	WY	3/29/93	0	0	4,810,578	
P2CWL8-08-0104-3100144	NORTHGLENN	CO	3/29/93	360,939	0	0	
TOTAL OF REGION 08 = 3				524,513	74,742	4,810,578	

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				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
E2CWM0-09-0291-3200028	NIPOMO COMM SERV. DIST.	CA	2/11/93	33,927	0	3,640,207	
E2CWM1-09-0035-3200034	TURLOCK, CITY OF	CA	3/ 3/93	63,076	0	0	
E2CWN1-09-0034-3300017	BANNING, CITY OF	CA	2/23/93	0	1,392,714	0	
E2AWT2-09-0333-3400016	LAKEPORT SD MIDDLETOWN	CA	1/21/93				935,000
E2AWT3-09-0082-3400037	SAN DIEGO, CITY OF	CA	3/29/93				11,800,000
S2CWN9-09-0028-3300010	SACRAMENTO RCSD	CA	2/ 1/93	1,049,052	1,968,584	0	
S2CWN0-09-0242-3300022	SAUSLITO MARIN CSD	CA	3/16/93	793,961	0	6,017,921	
S2CWN2-09-0046-3300023	WATSONVILLE, CITY OF	CA	3/18/93	390,764	0	19,993,784	
S2CWN0-09-0077-3300031	FRESNO, CITY OF	CA	3/29/93	1,090,822	0	325,076	
TOTAL OF REGION 09 = 9				3,421,602	3,361,298	29,976,988	12,735,000
P2CWN1-10-0030-3300021	ROSEBURG URBAN SD	OR	3/11/93	94,535	0	0	
P2CWN0-10-0008-3300030	CHEHALIS, CITY OF	WA	3/29/93	89,388	0	0	
TOTAL OF REGION 10 = 2				183,923	0	0	
TOTAL CONSTRUCTION GRANT AUDITS = 50				26,571,173	25,291,375	63,139,392	12,824,663
3. OTHER GRANT AUDITS							
C3HVK2-01-0375-3500178	PITTSFIELD	MA	12/ 3/92	0	0	0	
G3HVK2-01-0364-3500026	FAIRHAVEN	MA	10/ 8/92	0	0	0	
G3HVK2-01-0360-3500027	GARDNER	MA	10/ 8/92	0	0	0	
G3HVK2-01-0371-3500126	PRESQUE ISLE SEWER DISTRICT	ME	11/16/92	0	0	0	
G3HVK2-01-0370-3500138	ORLEANS, BREWSTER, EASTHAM	MA	11/17/92	0	0	0	
G3HVK3-01-0041-3500186	MATTAWAMKEAG TOWN OF	ME	12/10/92	0	0	0	
G3HVK3-01-0051-3500187	PLYMOUTH	CT	12/10/92	0	0	0	
G3HVK3-01-0059-3500194	CT HAZARDOUS WASTE MGT SER	CT	12/11/92	0	0	0	
G3HVK3-01-0056-3500226	RI CLEAN WATER PROTECTION AGRI		12/28/92	0	0	0	
G3HVK3-01-0065-3500281	WALPOLE, TOWN OF	MA	1/22/93	0	0	0	
G3HVK3-01-0066-3500325	DOVER, CITY OF	NH	2/10/93	0	0	0	
G3HVK3-01-0085-3500358	WALLINGFORD, TOWN OF	CT	2/19/93	0	0	0	
G3HVK3-01-0086-3500412	MANCHESTER CITY OF	NH	3/ 9/93	0	0	0	
G3HVK3-01-0084-3500460	MASS WATER POLLUTION TRUST	MA	3/22/93	0	0	0	
G3HVK1-01-0123-3500461	DUDLEY	MA	3/22/93	0	0	0	
G3HVK3-01-0094-3500465	NORTH HAVEN, TOWN OF	CT	3/24/93	0	0	0	
N3HVJ2-01-0255-3500127	MASSACHUSETTS, STATE	MA	11/16/92	0	0	0	
N3HVJ2-01-0374-3500137	VERMONT, STATE OF	VT	11/17/92	0	0	0	
N3HVK2-01-0330-3500180	CHATHAM	MA	12/ 8/92	0	0	0	
N3HVK2-01-0210-3500188	AMERICAN METEOROLOGICAL SOC.	MA	12/10/92	0	0	0	
N3HUK3-01-0047-3500192	AMERICAN METEOROLOGICAL SOC	MA	12/10/92	0	0	0	
N3HVK3-01-0070-3500326	STRAFFORD REGIONAL PLAN.COMMNH		2/10/93	0	0	0	
N3HVK1-01-0213-3500456	NORTHAMPTON	MA	3/19/93	0	0	0	
N3HVK3-01-0109-3500457	MAINE AUDUBON SOCIETY	ME	3/19/93	0	0	0	
TOTAL OF REGION 01 = 24				0	0	0	
C3HVK3-02-0092-3500266	BINGHAMTON	NY	1/15/93	0	0	0	
G3HVK3-02-0021-3500041	BERGEN COUNTY UA	NJ	10/27/92	0	0	0	
G3HVK3-02-0026-3500042	OXFORD	NY	10/27/92	0	0	0	
G3HVK3-02-0027-3500043	LOVE CANAL AREA REVITALIZATIN		10/27/92	0	0	0	
G3HVK3-02-0023-3500051	MANASQUAN RIVER RSA	NJ	10/28/92	0	0	0	
G3HVK3-02-0081-3500134	SALEM	NJ	11/17/92	0	0	0	
G3HVK3-02-0084-3500156	PORT WASHINGTON WPCD	NY	11/24/92	900	0	0	
G3HVK3-02-0089-3500221	MIDDLETOWN	NY	12/21/92	0	0	0	
G3HVK3-02-0096-3500255	BOLIVAR	NY	1/12/93	0	0	0	
G3HVK3-02-0097-3500259	MIDDLESEX COUNTY UA	NJ	1/14/93	0	0	0	
G3HVK3-02-0104-3500260	DELAWARE RIVER BASIN COMM	NJ	1/14/93	0	0	0	
G3HVK3-02-0106-3500268	HUDSON REGIONAL HEALTH COMM	NJ	1/20/93	0	0	0	
G3HVK3-02-0115-3500392	FLORHAM PARK SA	NJ	3/ 1/93	0	0	0	
G3HVK3-02-0117-3500411	OCEAN COUNTY UA	NJ	3/ 9/93	0	0	0	
G3HVK3-02-0122-3500448	GOWANDA	NY	3/18/93	0	0	0	
G3HVK3-02-0123-3500449	GOWANDA	NY	3/18/93	0	0	0	
N3HVK2-02-0142-3500040	ROCKLAND COUNTY	NY	10/27/92	0	0	0	
N3HVK3-02-0029-3500075	ELIZABETH	NJ	11/ 2/92	956	0	0	
N3HVK2-02-0149-3500135	MONROE COUNTY	NY	11/17/92	0	0	0	
N3HVK2-02-0151-3500136	NEW HARTFORD	NY	11/17/92	0	0	0	
N3HUK3-02-0017-3500157	RENSSALAER POLYTECHNIC INST	NY	11/24/92	0	0	0	
N3HVK2-02-0154-3500256	OSWEGO	NY	1/12/93	0	0	0	
N3HVK3-02-0045-3500270	MIDDLESEX COUNTY	NJ	1/20/93	0	0	0	
N3HVK3-02-0091-3500329	WESTCHESTER COUNTY	NY	2/11/93	0	0	0	
N3HVK3-02-0112-3500330	PR DEPT OF AGRICULTURE	PR	2/11/93	0	0	0	

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				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
N3HVK2-02-0113-3500331	NEW YORK STATE	NY	2/12/93	0	0	0	
N3HVK3-02-0088-3500447	ST REGIS MOHAWK TRIBE	NY	3/18/93	0	0	0	
N3HVK3-02-0093-3500471	NORWICH	NY	3/26/93	0	0	0	
N3HVK3-02-0090-3500472	KINGSTON	NY	3/26/93	0	0	0	
N3HVK3-02-0024-3500473	NEW JERSEY	NJ	3/26/93	0	0	0	
TOTAL OF REGION 02 = 30				1,856	0	0	
C3HVK2-03-0475-3500029	BALTIMORE COUNTY	MD	10/ 7/92	0	0	0	
C3HVK3-03-0048-3500172	WASHINGTON COUNTY	MD	11/30/92	0	0	0	
C3HVK3-03-0059-3500214	VA RESOURCES AUTHORITY	VA	12/17/92	0	0	0	
C3HVK2-03-0570-3500241	ANNE ARUNDEL COUNTY	MD	12/31/92	2,000	0	0	
C3HVK3-03-0080-3500244	CARROLL COUNTY	MD	12/31/92	0	0	0	
C3HVK3-03-0118-3500304	HARFORD COUNTY	MD	1/28/93	0	0	0	
C3HVK3-03-0118-3500305	HARFORD COUNTY	MD	1/28/93	0	0	0	
C3HVK3-03-0084-3500480	SUSSEX COUNTY	DE	3/30/93	0	0	0	
C3HVK3-03-0193-3500485	FAIRFAX COUNTY	VA	3/30/93	0	0	0	
E3FMP2-03-0364-3400017	OSDBU-NAMC	DC	1/25/93	0	0	0	
G3HVK3-03-0047-3500084	SUSQUEHANNA RIVER BASIN	PA	11/ 4/92	0	0	0	
G3HVK3-03-0060-3500168	PLUM BOROUGH SEWAR AUTH	PA	11/24/92	0	0	0	
G3HVK3-03-0061-3500169	BOONSBORO	MD	11/24/92	0	0	0	
G3HVK3-03-0063-3500170	HAMPTON ROADS SANITATION	VA	11/24/92	0	0	0	
G3HVK3-03-0058-3500171	RIDGELY	MD	11/25/92	0	0	0	
G3HUK3-03-0064-3500213	ENVIRONMENTAL LAW INSTITUTE	DC	12/17/92	0	0	0	
G3HVK3-03-0079-3500243	CAMBRIDGE	MD	12/31/92	0	0	0	
G3HVK3-03-0115-3500298	MARIANNA-WEST BETHLEHEM	PA	1/28/93	0	0	0	
G3HVK3-03-0116-3500299	WASHINGTON SUBURBAN SANITAT	MD	1/28/93	0	0	0	
G3HUK3-03-0117-3500306	RESOURCES FOR THE FUTURE INCDC	PA	1/28/93	0	0	0	
G3HVK3-03-0154-3500384	WYOMING VALLEY SANITARY AUTHPA	PA	2/26/93	0	0	0	
G3HVK3-03-0155-3500385	GARRETT COUNTY	MD	2/26/93	0	0	0	
G3HVK3-03-0156-3500386	PATTERSON TOWNSHIP MA	PA	2/26/93	0	0	0	
G3HUK3-03-0157-3500387	NATIONAL ASSOC.ATTORNEYS GENDC	DC	2/26/93	0	0	0	
G3HUK2-03-0476-3500446	NAMC	DC	3/17/93	0	0	0	
G3HUK3-03-0190-3500482	NAT ASSOC ATTORNEYS GENERAL	DC	3/30/93	0	0	0	
G3HVK3-03-0191-3500483	JACKSON TOWNSHIP MUA	PA	3/30/93	0	0	0	
G3HVK3-03-0192-3500484	MARIANNA-WEST BETHLEHEM	PA	3/30/93	0	0	0	
G3HVK3-03-0195-3500489	BUCKINGHAM TOWNSHIP	PA	3/30/93	0	0	0	
N3HUK3-03-0046-3500079	AMERICAN STATISTICAL ASSN	VA	11/ 3/92	0	0	0	
N3HVK2-03-0536-3500085	PA COMMONWEALTH OF	PA	11/ 4/92	0	0	0	
N3HVK2-03-0535-3500086	VA COMMONWEALTH OF	VA	11/ 4/92	0	0	0	
N3HUK2-03-0573-3500099	GEORGETOWN UNIVERSITY	DC	11/ 6/92	0	0	0	
N3HUK2-03-0532-3500100	GEORGETOWN UNIVERSITY	DC	11/ 6/92	0	0	0	
N3HUK2-03-0533-3500101	UNIVERSITY OF MARYLAND	MD	11/ 6/92	0	0	0	
N3HUK3-03-0049-3500212	NATIONAL COUNCIL OF SENIORS	DC	12/17/92	0	0	0	
N3HVK2-03-0604-3500242	WEST VIRGINIA STATE	WV	12/31/92	0	0	0	
N3HVK2-03-0091-3500307	DC DEPT OF PUBLIC WORKS	DC	1/28/93	0	0	0	
N3HVK2-03-0571-3500308	PHILADELPHIA CITY	PA	1/28/93	0	0	0	
N3HVK3-03-0081-3500381	FREDERICK CITY	MD	2/26/93	0	0	0	
N3HVK3-03-0083-3500382	HENRICO COUNTY	VA	2/26/93	0	0	0	
N3HVK3-03-0123-3500383	ALLEGHENY COUNTY	PA	2/26/93	0	0	0	
N3HVK2-03-0528-3500477	BALTIMORE CITY OF	MD	3/30/93	2,372,761	0	0	
N3HVK2-03-0524-3500478	DC DEPT OF PUBLIC WORKS	DC	3/30/93	0	0	0	
N3HVK3-03-0121-3500479	METRO WASHINGTON COG	DC	3/30/93	0	0	0	
N3HUK3-03-0194-3500488	ACADEMY OF NATURAL SCIENCES	PA	3/30/93	0	0	0	
TOTAL OF REGION 03 = 46				2,374,761	0	0	
C3HVK2-04-0472-3500229	DEKALB COUNTY	GA	12/29/92	0	0	0	
C3HVK3-04-0119-3500378	JEFFERSON COUNTY	AL	2/23/93	0	0	0	
C3HVK3-04-0128-3500391	NASHVILLE/DAVIDSON COUNTY	TN	3/ 1/93	0	0	0	
C3HVK3-04-0152-3500470	GREENSBORO	NC	3/25/93	0	0	0	
G3HVK2-04-0474-3500005	CLEVELAND UTILITIES	TN	10/ 5/92	0	0	0	
G3HVK2-04-0461-3500010	MUNFORD	TN	10/ 7/92	0	0	0	
G3HVK2-04-0475-3500011	ATHENS UTILITIES BOARD-SEWERTN	TN	10/ 7/92	0	0	0	
G3HVK3-04-0027-3500017	LAWRENCEBURG	TN	10/ 7/92	0	0	0	
G3HVK2-04-0469-3500018	ATOKA	TN	10/ 7/92	0	0	0	
G3HVK2-04-0468-3500020	MUNFORD	TN	10/ 7/92	0	0	0	
G3HVK2-04-0467-3500021	MUNFORD	TN	10/ 7/92	0	0	0	
G3HVK3-04-0026-3500022	LAWRENCEBURG	TN	10/ 7/92	0	0	0	
G3HVK2-04-0450-3500033	ATOKA	TN	10/ 9/92	0	0	0	
G3HVK2-04-0453-3500038	LAKE CITY	TN	10/26/92	0	0	0	
G3HVK2-04-0452-3500039	LAKE CITY	TN	10/26/92	0	0	0	
G3HVK2-04-0459-3500044	OLIVER SPRINGS	TN	10/27/92	0	0	0	
G3HVK2-04-0454-3500045	LAKE CITY	TN	10/27/92	0	0	0	

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
G3HVK2-04-0476-3500108	CULLMAN	AL	11/10/92	0	0	0	
G3HVK2-04-0473-3500116	MEDINA	TN	11/12/92	0	0	0	
G3HVK2-04-0478-3500125	ANNISTON WATER WORKS & SEWERAL		11/13/92	0	0	0	
G3HVK3-04-0019-3500130	OLD HICKORY UTILITY DIST	TN	11/16/92	0	0	0	
G3HVK3-04-0035-3500143	PARRISH	AL	11/18/92	0	0	0	
G3HVK3-04-0036-3500144	ROGERSVILLE	TN	11/18/92	0	0	0	
G3HVK3-04-0049-3500201	CARYVILLE	TN	12/15/92	0	0	0	
G3HVK3-04-0047-3500202	SALEMBURG	NC	12/16/92	0	0	0	
G3HVK3-04-0064-3500228	WESTERN CAROLINA REGIONAL SESC		12/29/92	0	0	0	
G3HVK3-04-0074-3500231	BENSON	NC	12/29/92	0	0	0	
G3HVK3-04-0050-3500236	IRVINGTON	KY	12/30/92	0	0	0	
G3HVK3-04-0077-3500237	UNION COUNTY	NC	12/30/92	0	0	0	
G3HVK3-04-0075-3500245	SMITHVILLE	TN	1/ 4/93	0	0	0	
G3HVK3-04-0078-3500246	GALLAWAY	TN	1/ 4/93	0	0	0	
G3HVK3-04-0082-3500247	LOUISVILLE	MS	1/ 4/93	0	0	0	
G3HVK3-04-0098-3500249	SPARTANBURG SANITARY SEWER	SC	1/ 7/93	0	0	0	
G3HVK3-04-0091-3500250	WASHINGTON	NC	1/ 7/93	0	0	0	
G3HVK3-04-0101-3500253	GRAND STRAND WATER & SEWER	SC	1/ 8/93	0	0	0	
G3HVK3-04-0104-3500269	NEW BERN	NC	1/20/93	0	0	0	
G3HVK3-04-0107-3500278	SNEEDVILLE	TN	1/22/93	0	0	0	
G3HVK3-04-0103-3500279	FAYETTEVILLE	NC	1/22/93	0	0	0	
G3HVK3-04-0106-3500280	LEXINGTON	NC	1/22/93	0	0	0	
G3HVK3-04-0118-3500318	BAY RIVER METROPOLITAN SEWAGNC		2/ 9/93	0	0	0	
G3HVK3-04-0132-3500338	OZARK UTILITIES BOARD	AL	2/18/93	0	0	0	
G3HVK3-04-0133-3500339	CENTRAL CITY	KY	2/18/93	0	0	0	
G3HVK3-04-0138-3500351	SPRINGFIELD	GA	2/18/93	0	0	0	
G3HVK3-04-0145-3500399	STAR	NC	3/ 3/93	0	0	0	
G3HVK3-04-0127-3500401	CELINA	TN	3/ 3/93	0	0	0	
G3HVK3-04-0149-3500413	BURLINGTON	NC	3/ 9/93	0	0	0	
G3HVK3-04-0135-3500414	PILOT MOUNTAIN	NC	3/ 9/93	0	0	0	
G3HVK3-04-0158-3500417	NASHVILLE	GA	3/ 9/93	0	0	0	
G3HVK3-04-0155-3500425	CHOCOWINITY	NC	3/11/93	0	0	0	
G3HVK3-04-0160-3500450	CHARLESTON	MS	3/18/93	0	0	0	
G3HVK3-04-0157-3500452	HENDERSON	NC	3/18/93	0	0	0	
G3HVK3-04-0154-3500462	STALLINGS	NC	3/23/93	0	0	0	
G3HVK3-04-0153-3500463	STALLINGS	NC	3/23/93	0	0	0	
G3HVK3-04-0159-3500494	LOUISVILLE & JEFFERSON SEWERKY		3/31/93	0	0	0	
N3HVK2-04-0401-3500058	SOUTH CAROLINA	SC	10/29/92	0	0	0	
N3HVK2-04-0466-3500124	KENTUCKY COMMON WEALTH	KY	11/13/92	0	0	0	
N3HVK2-04-0427-3500129	AUGUSTA	GA	11/16/92	0	0	0	
N3HVK2-04-0350-3500145	SEMINOLE TRIBE OF FLORIDA	FL	11/18/92	0	0	0	
N3HVK2-04-0449-3500146	ROCK HILL	SC	11/18/92	0	0	0	
N3HVK2-04-0412-3500199	BROWARD COUNTY	FL	12/15/92	0	0	0	
N3HVK2-04-0451-3500203	SAVANNAH	GA	12/16/92	0	0	0	
N3HVK3-04-0020-3500216	DADE COUNTY	FL	12/18/92	0	0	0	
N3HVK2-04-0462-3500230	HILLSBOROUGH CO.	FL	12/29/92	0	0	0	
N3HVK2-04-0407-3500254	FLORIDA, STATE OF	FL	1/ 8/93	0	0	0	
N3HUK3-04-0046-3500315	NORTHERN KENTUCKY UNIVERSITYKY		2/ 4/93	0	0	0	
N3HUK3-04-0090-3500316	WESTERN KENTUCKY UNIVERSITY	KY	2/ 4/93	0	0	0	
N3HUK3-04-0110-3500337	DUKE UNIVERSITY	NC	2/18/93	0	0	0	
N3HVK3-04-0089-3500349	MECKLENBURG COUNTY	NC	2/18/93	0	0	0	
N3HUK3-04-0100-3500350	CLEMSON UNIVERSITY	SC	2/18/93	0	0	0	
N3HVK3-04-0109-3500352	KNOX COUNTY	TN	2/18/93	0	0	0	
N3HVK3-04-0173-3500353	OKALOOSA COUNTY	FL	2/18/93	0	0	0	
N3HVK2-04-0477-3500379	NORTH CAROLINA STATE	NC	2/24/93	0	0	0	
N3HVK3-04-0105-3500380	SALISBURY	NC	2/24/93	0	0	0	
N3HVK3-04-0136-3500400	MANCHESTER	GA	3/ 3/93	0	0	0	
N3HVK3-04-0097-3500402	FORSYTH COUNTY	NC	3/ 3/93	0	0	0	
N3HVK3-04-0147-3500403	BELHAVEN	NC	3/ 3/93	0	0	0	
N3HVK3-04-0156-3500415	CLAYTON	AL	3/ 9/93	0	0	0	
N3HVK3-04-0164-3500416	ELIZABETH CITY	NC	3/ 9/93	0	0	0	
N3HVK3-04-0150-3500426	RALEIGH	NC	3/11/93	0	0	0	
N3HUK3-04-0120-3500440	LOUISVILLE UNIVERSITY OF	KY	3/17/93	0	0	0	
N3HVK2-04-0481-3500451	GEORGIA RESEARCH FOUNDATION	GA	3/18/93	0	0	0	
N3HVK3-04-0108-3500453	BUNCOMBE COUNTY	NC	3/18/93	0	0	0	
N3HVK3-04-0126-3500459	RESEARCH TRIANGLE INSTITUTE	NC	3/19/93	0	0	0	
N3HVK3-04-0025-3500492	NE REGIONAL DEVELOPMENT CTR	GA	3/30/93	0	0	0	
N3HUK3-04-0163-3500493	MISSISSIPPI STATE UNIVERSITYMS		3/30/93	0	0	0	
TOTAL OF REGION 04 = 85				0	0	0	

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommend Efficiency (Funds Be f To Better U
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
C3HVK2-05-0451-3500035	GRAND RAPIDS FY 91	MI	10/ 9/92	0	0	0	
C3HJV3-05-0032-3500083	FT WAYNE FY 91	IN	11/ 3/92	0	0	0	
C3HJV3-05-0051-3500155	HAMMOND FY 91	IN	11/23/92	0	0	0	
G3HJV2-05-0425-3500036	LAKE DALECARLIA RWD FY 90/1	IN	10/ 9/92	0	0	0	
G3HJV2-05-0424-3500037	LAKE DALECARLIA RWD FY 89	IN	10/ 9/92	0	0	0	
G3HVK2-05-0447-3500048	DOWNERS GROVE SD FY 92	IL	10/27/92	0	0	0	
G3HJV2-05-0453-3500063	LOOGOOTEY FY 91	IN	10/30/92	0	0	0	
G3HJV2-05-0452-3500064	BOONVILLE FY 91	IN	10/30/92	0	0	0	
G3HVK2-05-0456-3500065	N SHORE SD FY 92	IL	10/30/92	0	0	0	
G3HVK2-05-0458-3500066	E LANSING SD FY 92	MI	10/30/92	0	0	0	
G3HJV3-05-0030-3500081	ST PAUL MWCC FY 91	MN	11/ 3/92	0	0	0	
G3HVK3-05-0033-3500082	AHMEEK FY 92	MI	11/ 3/92	0	0	0	
G3HJV3-05-0023-3500112	DECATUR FY 91	IN	11/10/92	0	0	0	
G3HVK3-05-0025-3500113	STACY FY 91	MN	11/10/92	0	0	0	
G3HJV3-05-0043-3500140	TOLEDO LSD FY 90	OH	11/17/92	0	0	0	
G3HJV3-05-0040-3500141	TOLEDO LSD FY 87	OH	11/17/92	0	0	0	
G3HJV3-05-0041-3500142	TOLEDO LSD FY 88	OH	11/17/92	0	0	0	
G3HJV3-05-0029-3500147	SULLIVAN FY 91	IN	11/18/92	0	0	0	
G3HVK3-05-0067-3500148	NEWAYGO FY 92	MI	11/18/92	0	0	0	
G3HVK3-05-0065-3500149	DECATUR SD FY 92	IL	11/18/92	0	0	0	
G3HVK3-05-0046-3500160	ADDISON FY 92	IL	11/24/92	0	0	0	
G3HJV3-05-0086-3500162	BERNE FY 91	IN	11/24/92	0	0	0	
G3HVK3-05-0044-3500198	PINCKNEY FY 92	MI	12/15/92	11,414	0	0	
G3HVK3-05-0104-3500217	GARDEN CITY FY 92	MI	12/18/92	0	0	0	
G3HVK3-05-0102-3500218	INKSTER FY 92	MI	12/18/92	0	0	0	
G3HVK3-05-0094-3500219	COPPER HARBOR FY 92	MI	12/18/92	0	0	0	
G3HJV3-05-0109-3500273	WANATAH FY 90/91	IN	1/21/93	0	0	0	
G3HJV3-05-0110-3500274	JASPER FY 91	IN	1/21/93	0	0	0	
G3HJV3-05-0114-3500275	MCDONALD FY 90	OH	1/21/93	0	0	0	
G3HJV3-05-0123-3500314	RENSSELAER FY 91	IN	2/ 3/93	0	0	0	
G3HJV3-05-0137-3500333	W WAYNE RSD FY 90/91	IN	2/17/93	0	0	0	
G3HVK3-05-0145-3500369	NIPC FY 92	IL	2/23/93	0	0	0	
G3HJV3-05-0149-3500370	CLARKSVILLE FY 91	IN	2/23/93	0	0	0	
G3HJV3-05-0144-3500371	JEFFERSONVILLE FY 91	IN	2/23/93	0	0	0	
G3HVK3-05-0151-3500372	CINCINNATI MSD FY 91	OH	2/23/93	0	0	0	
G3HJV3-05-0150-3500373	BAINBRIDGE FY 90/91	IN	2/23/93	0	0	0	
G3HJV3-05-0152-3500374	TURKEY CREEK RSD FY 90/91	IN	2/23/93	0	0	0	
G3HJV3-05-0164-3500419	COATSVILLE FY 90/91	IN	3/ 9/93	0	0	0	
G3HJV3-05-0162-3500420	PALMYRA FY 90/91	IN	3/ 9/93	0	0	0	
G3HJV3-05-0163-3500422	CARBON FY 90/91	IN	3/ 9/93	0	0	0	
G3HJV3-05-0160-3500423	AMO FY 90/91	IN	3/ 9/93	0	0	0	
G3HJV3-05-0159-3500424	VAN BUREN FY 90/91	IN	3/ 9/93	0	0	0	
G3HJV3-05-0183-3500428	MIDDLETOWN FY 90/91	IN	3/11/93	0	0	0	
G3HJV3-05-0182-3500429	ETNA GREEN FY 90/91	IN	3/11/93	0	0	0	
G3HJV3-05-0181-3500431	MITCHELL FY 91	IN	3/11/93	0	0	0	
G3HJV3-05-0171-3500441	GEORGETOWN FY 90/91	IN	3/17/93	0	0	0	
G3HJV3-05-0165-3500442	LAPAZ FY 90/91	IN	3/17/93	0	0	0	
G3HJV3-05-0166-3500443	MICHIGAN CITY FY 91	IN	3/17/93	0	0	0	
G3HJV3-05-0161-3500444	DALE FY 90/91	IN	3/17/93	0	0	0	
N3HJV2-05-0454-3500034	MN U OF FY 91	MN	10/ 9/92	0	0	0	
N3HVK2-05-0292-3500046	COLUMBUS FY 91	OH	10/27/92	0	0	0	
N3HVK2-05-0365-3500047	CHICAGO PD FY 90	IN	10/27/92	0	0	0	
N3HJV2-05-0446-3500049	ELKHART FY 91	IN	10/27/92	0	0	0	
N3HUK2-05-0382-3500050	TOLEDO U FY 91	OH	10/27/92	0	0	0	
N3HVK2-05-0378-3500060	MENOMINEE IT FY 91	WI	10/30/92	0	0	0	
N3HVK2-05-0344-3500061	DANVILLE FY 91	IL	10/30/92	0	0	0	
N3HVK2-05-0428-3500062	TRAVERSE CITY FY 91	MI	10/30/92	0	0	0	
N3HVK2-05-0444-3500067	NEWARK FY 91	OH	10/30/92	0	0	0	
N3HJV2-05-0381-3500068	INDIANA BOH FY 91	IN	10/30/92	0	0	0	
N3HUK2-05-0432-3500069	OAKLAND U FY 91	MI	10/30/92	0	0	0	
N3HJV2-05-0433-3500080	SUMMIT CO FY 90	OH	11/ 3/92	0	0	0	
N3HVK0-05-0211-3500106	CHICAGO BOE FY 88	IL	11/10/92	0	0	0	
N3HVK2-05-0449-3500107	CHIPPEWA INDIANS	WI	11/10/92	0	0	0	
N3HJV0-05-0454-3500109	MARENGO FY 89	IN	11/10/92	0	0	0	
N3HUV2-05-0450-3500110	INDIANA U FY 91	IN	11/10/92	0	0	0	
N3HVK2-05-0411-3500111	EAU CLAIRE FY 91	WI	11/10/92	0	0	0	
N3HJV2-05-0427-3500131	S BEND FY 91	IN	11/16/92	0	0	0	
N3HUV1-05-0385-3500132	PURDUE U FY 90	IN	11/16/92	0	0	0	
N3HVK3-05-0026-3500133	STOCKBRIDGE MUNSEE FY 91	WI	11/16/92	0	0	0	
N3HVK1-05-0033-3500139	INDIANAPOLIS FY 89	IN	11/17/92	0	0	0	
N3HJV1-05-0482-3500150	WILLOUGHBY FY 89	OH	11/18/92	0	0	0	
N3HVK1-05-0223-3500151	WARREN FY 89	OH	11/18/92	0	0	0	
N3HUK2-05-0455-3500195	MN U OF FY 91	MN	12/15/92	0	0	0	
N3HUK3-05-0089-3500196	ST MARYS COLLEGE FY 91	MN	12/15/92	0	0	0	

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
N3HVK3-05-0090-3500197	IRONWOOD ASD FY 92	MI	12/15/92	0	0	0	
N3HVJ3-05-0103-3500220	BLOOMINGTON FY 90	IN	12/18/92	0	0	0	
N3HVJ3-05-0052-3500272	WISCONSIN U OF FY 90/91	WI	1/21/93	1,558	0	0	
N3HVK2-05-0227-3500327	WARREN FY 90	OH	2/10/93	0	0	0	
N3HVK3-05-0130-3500328	LEECH LAKE RES FY 91	MN	2/10/93	0	0	0	
N3HVK2-05-0370-3500334	OAKLAND CO FY 91	MI	2/17/93	275	0	0	
N3HVK3-05-0099-3500335	LEECH LAKE RES FY 90	MN	2/17/93	0	0	0	
N3HUK3-05-0120-3500368	CINCINNATI U OF FY 91	OH	2/23/93	0	0	0	
N3HVK3-05-0082-3500418	TOLEDO FY 91	OH	3/ 9/93	0	0	0	
N3HUK3-05-0105-3500421	BUTLER U FY 91/92	IN	3/ 9/93	0	0	0	
N3HUK3-05-0119-3500427	MICHIGAN TECH U FY 92	MI	3/11/93	0	0	0	
N3HVK2-05-0274-3500430	INDIANAPOLIS FY 90	IN	3/11/93	36,053	0	0	
N3HVJ3-05-0087-3500445	EVANSVILLE FY 91	IN	3/17/93	0	0	0	
TOTAL OF REGION 05 = 87				49,300	0	0	
G3HVK3-06-0044-3500115	VICTORIA COUNTY WCID #2	TX	11/10/92	0	0	0	
G3HVK3-06-0052-3500204	COLLINSVILLE	OK	12/17/92	0	0	0	
G3HVK3-06-0053-3500206	COLLINSVILLE,	OK	12/17/92	0	0	0	
G3HVK3-06-0054-3500207	COLLINSVILLE	OK	12/17/92	0	0	0	
G3HVK3-06-0059-3500211	BROWNSVILLE	TX	12/17/92	0	0	0	
G3HVK3-06-0085-3500398	TAHLEQUAH	OK	3/ 2/93	0	0	0	
G3HVK3-06-0086-3500434	CLEO SPRINGS	OK	3/15/93	0	0	0	
G3HVK3-06-0087-3500435	IDALOU	TX	3/15/93	0	0	0	
G3HVK3-06-0091-3500436	NASH	OK	3/16/93	0	0	0	
N3HVK3-06-0022-3500012	NO. CENTRAL TX COUNCIL OF GOTX		10/ 7/92	0	0	0	
N3HVK3-06-0023-3500013	CENTRAL TEXAS COUNCIL OF GOVTX		10/ 7/92	0	0	0	
N3HVK3-06-0024-3500015	HOUSTON	TX	10/ 7/92	0	0	0	
N3HVK3-06-0025-3500016	HOUSTON	TX	10/ 7/92	0	0	0	
N3HVK3-06-0026-3500019	ST. BERNARD PARISH POLICE JULA		10/ 7/92	0	0	0	
N3HVK3-06-0027-3500023	SANTA FE	NM	10/ 7/92	0	0	0	
N3HUK3-06-0028-3500024	UNIVERSITY OF OKLAHOMA	OK	10/ 8/92	0	0	0	
N3HVK3-06-0029-3500025	TERREBONNE PARISH CONSOL.GVMLA		10/ 8/92	0	0	0	
N3HVK3-06-0030-3500028	ALBUQUERQUE	NM	10/ 8/92	0	0	0	
N3HVK3-06-0035-3500070	EL PASO	TX	11/ 2/92	0	0	0	
N3HUK3-06-0034-3500071	ROSE STATE COLLEGE	OK	11/ 2/92	0	0	0	
N3HVK3-06-0033-3500072	CHEROKEE NATION OF OKLAHOMA		11/ 2/92	0	0	0	
N3HVK3-06-0038-3500073	GALVESTON COUNTY HEALTH DISTTX		11/ 2/92	0	0	0	
N3HVK3-06-0040-3500076	LOWER RIO GRAND VALLEY DEV. TX		11/ 2/92	0	0	0	
N3HVK3-06-0041-3500077	AUSTIN	TX	11/ 2/92	0	0	0	
N3HVK3-06-0042-3500078	POJOAQUE PUEBLO	NM	11/ 2/92	0	0	0	
N3HVK3-06-0043-3500114	PUEBLO OF SANDIA	NM	11/10/92	0	0	0	
N3HVK3-06-0045-3500120	ARKANSAS DEPT. OF ED,GEN.DIVAR		11/12/92	0	0	0	
N3HVK3-06-0046-3500121	ARKANSAS DEPT OF ED.GEN.DIV.AR		11/12/92	0	0	0	
N3HVK3-06-0057-3500209	LOWER RIO GRANDE VALLEY DEV.TX		12/17/92	0	0	0	
N3HVK3-06-0058-3500210	BAYTOWN	TX	12/17/92	0	0	0	
N3HUK3-06-0062-3500257	UNIVERSITY OF AR MEDICAL SCIAR		1/12/93	0	0	0	
N3HUK3-06-0061-3500258	UNIVERSITY OF AR MED.SCIENCEAR		1/12/93	0	0	0	
N3HUK3-06-0080-3500365	OKLAHOMA ST.UNIVERSITYOC	OK	2/23/93	0	0	0	
N3HVK3-06-0081-3500366	EDMOND	OK	2/23/93	0	0	0	
N3HVK3-06-0082-3500367	CENTRAL TEXAS COG	TX	2/23/93	0	0	0	
N3HVK3-06-0084-3500390	ENERGY MINERALS NATURAL RS. NM		2/26/93	0	0	0	
TOTAL OF REGION 06 = 36				0	0	0	
C3HVJ3-07-0069-3500345	DEPT OF ENVIRON CONTROL	NE	2/18/93	0	0	0	
C3HVK2-07-0212-3500466	KANSAS CITY	KS	3/24/93	0	0	0	
G3HVK2-07-0217-3500004	ARCADIA	MO	10/ 5/92	0	0	0	
G3HVK3-07-0023-3500091	LOUP CITY	NE	11/ 6/92	0	0	0	
G3HVK3-07-0024-3500092	LANSING	KS	11/ 6/92	0	0	0	
G3HVK3-07-0027-3500095	MONETT	MO	11/ 6/92	0	0	0	
G3HVK3-07-0031-3500128	JUNCTION CITY	KS	11/16/92	0	0	0	
G3HVK3-07-0045-3500239	MCPHERSON	KS	12/30/92	0	0	0	
G3HVK3-07-0052-3500262	LAKE WABAUNSEE IMPROVEMENT	KS	1/14/93	0	0	0	
G3HVK3-07-0068-3500263	OWENSVILLE	MO	1/14/93	0	0	0	
G3HVK3-07-0053-3500276	ANKENY	IA	1/22/93	0	0	0	
G3HVK3-07-0051-3500277	DIAMOND	MO	1/22/93	0	0	0	
G3HVK3-07-0074-3500286	FORSYTH	MO	1/27/93	0	0	0	
G3HVK3-07-0077-3500291	MINATARE	NE	1/27/93	0	0	0	
G3HVK3-07-0079-3500292	SCOTTSBLUFF	NE	1/27/93	0	0	0	
G3HVK3-07-0082-3500309	HORACE	KS	1/28/93	0	0	0	
G3HVK3-07-0056-3500310	MET ST LOUIS SEWER DISTRICT	MO	1/29/93	0	0	0	
G3HVK3-07-0089-3500320	TILDEN	NE	2/ 9/93	0	0	0	
G3HVK3-07-0086-3500321	GORDON	NE	2/ 9/93	0	0	0	

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommended Efficiency (Funds Be Put To Better Use)
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
G3HVK3-07-0088-3500323	NEVADA,	IA	2/ 9/93	0	0	0	
G3HVK3-07-0084-3500324	SUMMERSVILLE	MO	2/ 9/93	0	0	0	
G3HVK3-07-0090-3500340	ALTAMONT	MO	2/18/93	0	0	0	
G3HVK3-07-0085-3500347	WEBB CITY,	MO	2/18/93	0	0	0	
G3HVK3-07-0083-3500348	PUXICO	MO	2/18/93	0	0	0	
G3HVK3-07-0081-3500354	BENNET	NE	2/18/93	0	0	0	
G3HVK3-07-0093-3500355	LOCKWOOD	MO	2/18/93	0	0	0	
G3HVK3-07-0094-3500359	PORTSMOUTH	IA	2/19/93	0	0	0	
G3HVK3-07-0091-3500360	ST MARYS	IA	2/19/93	0	0	0	
G3HVK2-07-0220-3500393	DODGE CITY	KS	3/ 1/93	0	0	0	
G3HVK3-07-0057-3500394	LAUREL	IA	3/ 1/93	0	0	0	
G3HVK3-07-0055-3500396	FAIR GROVE	MO	3/ 1/93	0	0	0	
G3HVK3-07-0107-3500454	CUMMING	IA	3/18/93	0	0	0	
G3HVK3-07-0105-3500481	ST PETERS	MO	3/30/93	0	0	0	
G3HVK3-07-0102-3500486	AINSWORTH	NE	3/30/93	0	0	0	
G3HVK3-07-0118-3500491	HARVEY	IA	3/30/93	0	0	0	
N3HVK2-07-0215-3500007	BONNER SPRINGS	KS	10/ 6/92	0	0	0	
N3HVK3-07-0022-3500090	SELIGMAN	MO	11/ 6/92	1,148	0	0	
N3HVK3-07-0029-3500103	TOPEKA	KS	11/ 6/92	0	0	0	
N3HUK3-07-0030-3500105	MISSOURI UNIV OF-COLUMBIA	MO	11/ 6/92	0	0	0	
N3HVK3-07-0042-3500158	WICHITA	KS	11/24/92	0	0	0	
N3HVK2-07-0211-3500161	JOHNSON COUNTY	KS	11/24/92	0	0	0	
N3HVK3-07-0040-3500164	RENO COUNTY	KS	11/24/92	0	0	0	
N3HVK3-07-0041-3500165	DOUGLAS COUNTY	NE	11/24/92	0	0	0	
N3HVK3-07-0043-3500174	IRONDALE	MO	12/ 2/92	0	0	0	
N3HVK3-07-0066-3500248	MARION COUNTY	KS	1/ 6/93	0	0	0	
N3HVK3-07-0026-3500264	NEBRASKA DEPT OF HEALTH	NE	1/14/93	0	0	0	
N3HVK3-07-0067-3500265	MERAMEC REGIONAL PLANNING	MO	1/14/93	0	0	0	
N3HVK3-07-0075-3500267	NEVADA	IA	1/15/93	0	0	0	
N3HUK3-07-0058-3500271	JR COLLEGE DIST	MO	1/21/93	0	0	0	
N3HVK3-07-0076-3500284	KIRKWOOD COMMUNITY COLLEGE	IA	1/27/93	0	0	0	
N3HVK3-07-0060-3500285	WINNEBAGO TRIBE	NE	1/27/93	0	0	0	
N3HVK3-07-0059-3500297	OMAHA	NE	1/28/93	0	0	0	
N3HVK2-07-0216-3500362	IOWA STATE OF	IA	2/22/93	0	0	0	
N3HVK2-07-0199-3500363	MISSOURI STATE	MO	2/22/93	0	0	0	
N3HVK3-07-0028-3500364	KANSAS STATE OF	KS	2/22/93	0	0	0	
N3HVK3-07-0092-3500395	GOLDEN CITY	MO	3/ 1/93	0	0	0	
N3HVK3-07-0096-3500404	FARMINGTON	MO	3/ 3/93	0	0	0	
TOTAL OF REGION 07 = 57				1,148	0	0	
G3HVK3-08-0023-3500102	MINOT	ND	11/ 6/92	0	0	0	
G3HVK3-08-0026-3500123	CENTRAL CASS SCHOOL DIST	ND	11/13/92	0	0	0	
G3HVK3-08-0040-3500287	MISSION	SD	1/27/93	0	0	0	
G3HVK3-08-0042-3500295	LIDGERWOOD	ND	1/28/93	0	0	0	
G3HVK3-08-0036-3500303	CUSTER CITY	SD	1/28/93	0	0	0	
G3HVK3-08-0051-3500336	CASPER	WY	2/17/93	0	0	0	
G3HVK3-08-0045-3500341	CHEYENNE	WY	2/18/93	0	0	0	
G3HVK3-08-0047-3500342	GILLETTE	WY	2/18/93	0	0	0	
G3HVK3-08-0048-3500343	WHEATLAND	WY	2/18/93	0	0	0	
G3HVK3-08-0046-3500356	MISSOULA	MT	2/18/93	0	0	0	
G3HVK2-08-0102-3500397	LONGMONT	CO	3/ 1/93	0	0	0	
G3HVK3-08-0059-3500437	LAKE ANDES	SD	3/16/93	0	0	0	
G3HVK3-08-0060-3500438	SARATOGA - CARBON COUNTY	WY	3/16/93	0	0	0	
G3HVK3-08-0061-3500439	LARAMIE	WY	3/16/93	0	0	0	
G3HVK2-08-0072-3500458	HAZEL	SD	3/19/93	0	0	0	
G3HVK3-08-0063-3500467	SILVERTON	CO	3/24/93	0	0	0	
G3HVK3-08-0064-3500474	THE KEYSTONE CENTER	CO	3/30/93	0	0	0	
G3HVK3-08-0062-3500487	KEYSTONE CENTER	CO	3/30/93	0	0	0	
G3HVK3-08-0067-3500490	GREAT FALLS	MT	3/30/93	0	0	0	
N3HVK2-08-0101-3500008	FARGO	ND	10/ 6/92	0	0	0	
N3HVK2-08-0098-3500009	ASSINIBOINE & SIOUX TRIBES	MT	10/ 6/92	0	0	0	
N3HVK3-08-0024-3500104	MINOT	ND	11/ 6/92	0	0	0	
N3HVK2-08-0099-3500159	OGALA SIOUX TRIBE	SD	11/24/92	0	0	0	
N3HVK3-08-0029-3500173	LOWER BRULE SIOUX TRIBE	SD	12/ 2/92	0	0	0	
N3HVK3-08-0030-3500175	DEPT. HEALTH & SOCIAL SER	WY	12/ 2/92	0	0	0	
N3HVK3-08-0028-3500176	CHEYENNE RIVER SIOUX TRIBE	SD	12/ 2/92	0	0	0	
N3HVK3-08-0027-3500177	BISMARCK	ND	12/ 2/92	0	0	0	
N3HVK2-08-0084-3500261	LOVELL	WY	1/14/93	0	0	0	
N3HVK2-08-0100-3500288	UTAH STATE OF	UT	1/27/93	0	0	0	
N3HVK3-08-0034-3500289	BOULDER	CO	1/27/93	0	0	0	
N3HVK3-08-0025-3500293	SOUTH DAKOTA, STATE OF	SD	1/28/93	20,812	0	0	
N3HVK2-08-0103-3500300	MONTANA STATE OF	MT	1/28/93	0	0	0	
N3HVK3-08-0037-3500319	PLATTE	SD	2/ 9/93	0	0	0	

Assignment Control Number	Title	Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
			Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
N3HVK3-08-0043-3500357	TURTLE MTN BAND OF CHIPPEWA ND	2/18/93	0	0	0	
N3HVK3-08-0050-3500405	PUEBLO CO	3/ 3/93	0	0	0	
N3HVK3-08-0052-3500406	MISSOULA COUNTY MT	3/ 3/93	0	0	0	
N3HVK3-08-0049-3500407	CASPER COLLEGE WY	3/ 3/93	1,373	0	0	
N3HVK2-08-0088-3500408	WELD CO	3/ 3/93	0	0	0	
N3HVJ2-08-0087-3500409	CASS COUNTY ND	3/ 3/93	0	0	0	
N3HVK3-08-0065-3500475	THE KEYSTONE CENTER CO	3/30/93	0	0	0	
N3HVK3-08-0066-3500476	THE KEYSTONE CENTER CO	3/30/93	0	0	0	
TOTAL OF REGION 08 = 41			22,185	0	0	
C3HVK3-09-0142-3500495	HONOLULU CITY AND COUNTY OF HI	3/31/93	0	0	0	
G3HVK3-09-0067-3500191	SEDONA, CITY OF AZ	12/10/92	0	0	0	
G3HVK3-09-0068-3500193	PINETOP-LAKESIDE SAN DIST AZ	12/10/92	0	0	0	
G3HVK3-09-0079-3500238	LITTLE COLORADO SANIT DIST CO	12/30/92	0	0	0	
G3HVK3-09-0114-3500361	AVONDALE, CITY OF AZ	2/22/93	0	0	0	
G3HVK3-09-0133-3500455	LAKE HAVASU CITY AZ	3/18/93	0	0	0	
N3HUK2-09-0280-3500031	CALIF PUBLIC HEALTH FOUNDAT CA	10/ 8/92	0	0	0	
N3HVK2-09-0288-3500032	CLARK COUNTY HLTH DIST NV	10/ 8/92	0	0	0	
N3HVK2-09-0038-3500052	MODESTO, CITY OF CA	10/28/92	0	0	0	
N3HVK2-09-0324-3500053	VENTURA, COUNTY OF CA	10/28/92	0	0	0	
N3HVK3-09-0039-3500056	SONOMA, COUNTY OF CA	10/28/92	0	0	0	
N3HVK3-09-0042-3500087	SAN DIEGO COUNTY OF CA	11/ 4/92	0	0	0	
N3HVK2-09-0291-3500088	GILA RIVER INDIAN COMMUNITY AZ	11/ 4/92	0	0	0	
N3HVK2-09-0284-3500093	BAY AREA AIR QTY MGM DIST CA	11/ 6/92	0	0	0	
N3HVK3-09-0047-3500094	GUALALA COMMUNITY SVCS DIST CA	11/ 6/92	0	0	0	
N3HVK3-09-0048-3500098	KINGS, COUNTY OF CA	11/ 6/92	0	0	0	
N3HVK2-09-0294-3500118	KAUAI, COUNTY OF HI	11/12/92	0	0	0	
N3HVK2-09-0287-3500119	CLARK COUNTY NV	11/12/92	0	0	0	
N3HVK2-09-0286-3500122	CLARK COUNTY NV	11/12/92	0	0	0	
N3HVK2-09-0356-3500152	LAKE HAVASU CITY AZ	11/19/92	17,227	0	0	
N3HVK2-09-0325-3500153	HAWAII, DEPT OF HEALTH HI	11/19/92	0	0	0	
N3HVK2-09-0283-3500154	ASOC NAC PRO PERS CA	11/19/92	0	0	0	
N3HUK3-09-0057-3500166	POINT REYES BIRD OBSERVATORY CA	11/24/92	0	0	0	
N3HVK2-09-0277-3500179	CHUUK, STATE OF FM	12/ 4/92	0	0	0	
N3HVK2-09-0276-3500183	POHNPEI, STATE OF FM	12/ 8/92	0	0	0	
N3HVK3-09-0061-3500185	L.A. DEPT OF WATER & POWER CA	12/ 9/92	0	0	0	
N3HVK2-09-0353-3500189	WHITE MOUNTAIN APACHE TRIBE AZ	12/10/92	0	0	0	
N3HVK3-09-0033-3500200	FORT MOJAVE IND. TRIBE CA	12/15/92	0	0	0	
N3HVK2-09-0330-3500225	NEVADA, STATE OF NV	12/23/92	0	0	0	
N3HVK3-09-0077-3500227	WHITE MOUNTAIN APACHE TRIBE AZ	12/28/92	0	0	0	
N3HVK2-09-0301-3500232	SONOMA STATE UNIV ACAD FOUN CA	12/29/92	0	0	0	
N3HVK3-09-0078-3500234	MADERA, CITY OF CA	12/29/92	0	0	0	
N3HVK2-09-0282-3500235	AMERICAN SAMOA GOVERNMENT AS	12/29/92	0	0	0	
N3HVK3-09-0088-3500252	AMERICAN SAMOA GOVERNMENT AS	1/ 7/93	0	0	0	
N3HVK3-09-0059-3500282	SANTA ANA WTRSHED PROJ AUT CA	1/26/93	0	0	0	
N3HVK3-09-0103-3500312	FIELDBROOK COMM SERVICES DISCA	1/29/93	0	0	0	
N3HVK2-09-0323-3500313	LOS ANGELES, CITY OF CA	1/29/93	0	0	0	
N3HUK2-09-0289-3500317	PIMA CNTY COMM COLLEGE DIS AZ	2/ 4/93	0	0	0	
N3HVK2-09-0275-3500332	PALAU, REPUBLIC OF PU	2/12/93	2,035	0	0	
N3HVK3-09-0115-3500376	LAKE, COUNTY OF CA	2/23/93	0	0	0	
N3HVK2-09-0295-3500388	PRESCOTT, CITY OF AZ	2/26/93	0	0	0	
N3HUK3-09-0050-3500389	CA POLYTECH STATE UNIV FOUN CA	2/26/93	0	0	0	
N3HVJ3-09-0071-3500410	PIMA COUNTY AZ	3/ 4/93	0	0	0	
N3HVK3-09-0127-3500432	SAN DIEGO, CITY OF CA	3/11/93	0	0	0	
N3HVK2-09-0355-3500433	HAWAII, DEPT OF AGRICULTURE HI	3/11/93	0	0	0	
N3HUK3-09-0028-3500464	HORNET FOUNDATION, INC CA	3/23/93	0	0	0	
N3HVK3-09-0139-3500468	ALBANY, CITY OF CA	3/25/93	0	0	0	
TOTAL OF REGION 09 = 47			19,262	0	0	
G3HVJ3-10-0022-3500181	CAMAS, CITY OF WA	12/ 8/92	0	0	0	
G3HVK3-10-0024-3500184	TROY, CITY OF ID	12/ 8/92	0	0	0	
G3HVJ3-10-0028-3500190	BLACK DIAMOND, CITY OF WA	12/10/92	0	0	0	
G3HVK3-10-0029-3500222	POST FALLS, CITY OF ID	12/22/92	0	0	0	
G3HVK3-10-0030-3500223	POST FALLS, CITY OF ID	12/22/92	0	0	0	
G3HVK3-10-0031-3500224	POST FALLS, CITY OF ID	12/22/92	0	0	0	
G3HVK3-10-0037-3500251	NEWPORT, CITY OF OR	1/ 7/93	0	0	0	
N3HVK2-10-0131-3500014	CORVALLIS, CITY OF OR	10/ 7/92	0	0	0	
N3HVK2-10-0104-3500030	SUQUAMISH TRIBE WA	10/ 8/92	0	0	0	
N3HVJ2-10-0095-3500054	MUNI OF METRO SEATTLE WA	10/28/92	0	0	0	
N3HVJ2-10-0090-3500055	ALASKA, STATE OF AK	10/28/92	0	0	0	
N3HVK2-10-0094-3500057	LUMMI BUSINESS COUNCIL WA	10/28/92	0	0	0	
N3HUK2-10-0091-3500059	BOISE STATE UNIVERSITY ID	10/29/92	0	0	0	
N3HVJ2-10-0099-3500089	CAMAS, CITY OF WA	11/ 4/92	0	0	0	

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommendation Efficiency (Funds Be Put To Better Use
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
N3HVK2-10-0117-3500097	YAKIMA INDIAN NATION	ID	11/ 6/92	0	0	0	
N3HUK3-10-0009-3500117	IDAHO, UNIV OF	ID	11/12/92	0	0	0	
N3HVK2-10-0097-3500167	ANCHORAGE, MUNICIPALITY OF	AK	11/24/92	0	0	0	
N3HVK3-10-0023-3500182	MAKAH TRIBAL COUNCIL	WA	12/ 8/92	0	0	0	
N3HVJ2-10-0105-3500233	TACOMA, CITY OF	WA	12/29/92	0	0	0	
N3HVK2-10-0114-3500283	MUCKLESHOOT INDIAN TRIBE	WA	1/26/93	0	0	0	
N3HVK2-10-0102-3500311	LEWISTON, CITY OF	ID	1/29/93	0	0	0	
N3HVK2-10-0098-3500375	BOISE CITY	ID	2/23/93	0	0	0	
N3HVJ2-10-0103-3500377	MUNI OF METRO SEATTLE	WA	2/23/93	0	0	0	
N3HVJ3-10-0045-3500469	CLARK COUNTY	WA	3/25/93	0	0	0	
TOTAL OF REGION 10 = 24				0	0	0	
TOTAL OTHER GRANT AUDITS = 477				2,468,512	0	0	
5. SUPERFUND GRANTS							
P5BKN1-03-0305-3300004	SF COOPERATIVE AGREEMENTS	DC	11/ 6/92	3,140	699,988	0	
P5BGN1-03-0306-3300008	SF COOPERATIVE AGREEMENTS	MD	1/27/93	214,804	83,578	0	
TOTAL OF REGION 03 = 2				217,944	783,566	0	
P5EGN1-07-0191-3300032	MISSOURI DNR	MO	3/30/93	135,781	62,643	0	
TOTAL OF REGION 07 = 1				135,781	62,643	0	
P5BGN2-08-0019-3300033	DEPT OF HEALTH & ENVIR SCI	MT	3/31/93	0	12,057,987	0	
TOTAL OF REGION 08 = 1				0	12,057,987	0	
H5BFL2-11-0046-3100041	SF IAG'S HHS FY 90		12/ 1/92				
H5BFL2-11-0046-3100042	SF IAG'S HHS FY 90		12/ 1/92				
M5BFL2-11-0025-3100040	SF-IAG FY90 DOT-COAST GUARD	DC	12/ 1/92				
M5BFL3-11-0014-3100046	SF IAG DOI USGS		12/ 3/92				
M5BFL2-11-0045-3100059	SF-IAG FY91 DOI		1/ 4/93				
M5BFL2-11-0026-3100090	SF-IAG FY 91 DOT		2/ 1/93				
M5BFL2-11-0027-3100123	SF-IAG FY 91 ARMY		3/ 9/93				
M5BFL2-11-0023-3100142	SF-IAG FY91 FEMA EXPEND.	DC	3/25/93				
M5BFL2-11-0045-3100158	SF-IAG FY91 DOI		3/31/93				
TOTAL OF REGION 11 = 9							
TOTAL SUPERFUND GRANTS = 13				353,725	12,904,196	0	
D8DML2-01-0355-3100028	EASTERN RESEARCH GROUP, INC.	MA	11/16/92	*The dollar value of contract audits have not been shown. Public disclosure of the dollar value of financial recommendations could prematurely reveal the Government's negotiating positions or release of this information is not routinely available under the Freedom of Information Act. The number of these reports and dollar value of the findings have been included in the aggregate data displayed below. Such data individually excluded in this listing will be provided to the Congress under separate memorandum within 30 days of the transmittal of the semiannual report to the agency head. The transmitted data will contain appropriate cautions regarding disclosure.			
D8AML2-01-0259-3100031	INTERNATIONAL FUEL CELLS	CT	11/17/92				
D8AAL3-01-0019-3100032	ENSR	MA	11/17/92				
D8BML2-01-0162-3100047	COMBUSTION ENGINEERING CORP.	CT	12/ 3/92				
D8AML3-01-0022-3100048	EASTERN RESEARCH GROUP	MA	12/ 8/92				
D8AAL3-01-0018-3100049	SIGMA RESEARCH CORP.	MA	12/ 9/92				
D8CAL2-01-0155-3100105	COMBUSTION ENGINEERING INC.	CT	2/18/93				
D8AML3-01-0117-3100139	INDUSTRIAL ECONOMICS INC	MA	3/19/93				
D8AMP3-01-0078-3400020	CADMUS GROUP INC.	MA	2/16/93				
D8AMP3-01-0075-3400028	MULTISYSTEMS INC	MA	3/ 8/93				
E8AXP3-01-0055-3400013	TRC ENVIRONMENTAL CORP.	CT	1/ 8/93				
E8AXP3-01-0058-3400021	TRC ENVIRONMENTAL CORP	CT	2/19/93				
E8AAP3-01-0077-3400031	TRC ENVIRONMENTAL CORP	MA	3/22/93				
E8AAP3-01-0076-3400032	TRC ENVIRONMENTAL CORP	MA	3/22/93				
P8AML2-01-0367-3100009	ALLIANCE TECH. CORP.	MA	10/ 8/92				
TOTAL OF REGION 01 = 15							
D8DML3-02-0080-3100029	MALCOLM PIRNIE INC.	NY	11/17/92				
D8CML3-02-0124-3100138	SYRACUSE RESEARCH CORP	NY	3/19/93				
P8AXP3-02-0098-3400022	ECOLOGY & ENVIR	NY	2/19/93				
P8AXP3-02-0094-3400026	ECOLOGY & ENVIR	NY	3/ 1/93				
TOTAL OF REGION 02 = 4							

Assignment Control Number	Title	Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
			Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
D8AWL3-03-0020-3100033	ENGINEERING TECHNOLOGIES AS MD	11/17/92				
D8AWL3-03-0019-3100034	JACA PA	11/17/92				
D8BML3-03-0072-3100063	VIKING SYSTEMS INTERNATIONALPA	1/ 6/93				
D8EML3-03-0086-3100064	NETWORK CORPORATION VA	1/ 6/93				
D8BML3-03-0087-3100065	EG&G WASHINGTON MD	1/ 6/93				
D8BML3-03-0088-3100066	VIGYAN INCORPORATED VA	1/ 6/93				
D8EML3-03-0089-3100067	SCIENTEX CORP VA	1/ 6/93				
D8EML3-03-0090-3100068	CIEL, INC. DC	1/ 7/93				
D8DML3-03-0091-3100069	CONSOLIDATED COAL CO. PA	1/ 7/93				
D8BML3-03-0092-3100070	PA STATE UNIVERSITY PA	1/ 7/93				
D8EML3-03-0095-3100071	ECG, INC VA	1/ 8/93				
D8ALL3-03-0022-3100072	MERIDIAN RESEARCH INC MD	1/ 8/93				
D8AAL3-03-0018-3100073	SULLIVAN ENVIRONMENTAL VA	1/ 8/93				
D8AAL3-03-0104-3100100	MCWANE & COMPANY VA	2/11/93				
D8CML3-03-0147-3100107	VERSAR VA	2/22/93				
D8CML3-03-0148-3100108	VERSAR VA	2/22/93				
D8CML3-03-0149-3100109	VERSAR VA	2/22/93				
D8CML3-03-0150-3100110	VERSAR VA	2/22/93				
D8AAL3-03-0097-3100120	E.H. PECHAN VA	3/ 8/93				
D8AAL3-03-0099-3100121	VIGYAN VA	3/ 8/93				
D8AAL3-03-0102-3100122	E.H. PECHAN VA	3/ 8/93				
D8AAL3-03-0109-3100134	SOCIOECONOMIC TECHNICAL VA	3/16/93				
D8AAL3-03-0103-3100135	PACIFIC ENVIRONMENTAL VA	3/16/93				
P8AXP3-03-0073-3400008	ICF CORP. VA	12/ 3/92				
TOTAL OF REGION 03 = 24						
D8AML3-04-0059-3100020	TRIGON ENGINEERING CONSULTI NC	11/ 2/92				
D8AML3-04-0028-3100025	EC/R NC	11/ 6/92				
D8EML3-04-0037-3100039	ENVIRONMENTAL INVESTIGATIONSNC	11/20/92				
D8CML3-04-0021-3100043	MANTECH NC	12/ 2/92				
D8AML3-04-0079-3100057	SYSTEMS RESEARCH & DEVELOP. NC	1/ 4/93				
D8CML3-04-0058-3100060	MANTECH NC	1/ 4/93				
D8CML3-04-0057-3100081	SOUTHERN RESEARCH INSTITUTE AL	1/22/93				
D8AML3-04-0122-3100115	EC/R NC	2/26/93				
D8AML3-04-0114-3100116	TRIGON ENGINEERING NC	3/ 1/93				
D8AML3-04-0116-3100117	ALPHA-GAMMA NC	3/ 1/93				
D8AML3-04-0113-3100125	EMAC NC	3/11/93				
D8BML3-04-0189-3100126	MANTECH NC	3/11/93				
D8AML3-04-0112-3100127	EC/R NC	3/11/93				
D8AML3-04-0129-3100128	EASTERN TECHNICAL NC	3/11/93				
D8BML3-04-0190-3100131	GEORGIA TECH GA	3/11/93				
D8AML3-04-0115-3100133	ENTROPY NC	3/11/93				
H8CML2-04-0344-3100026	RESEARCH TRIANGLE INST NC	11/13/92				
H8AML3-04-0117-3100154	RESEARCH TRIANGLE INSTITUTE NC	3/31/93				
TOTAL OF REGION 04 = 18						
D8BML2-05-0383-3100011	FEV OF AMERICA FY 92 MI	10/ 9/92				
D8BML2-05-0313-3100052	AT KEARNEY FY 89 IL	12/15/92				
D8CML3-05-0088-3100080	COLEJON MECH OH	1/21/93				
D8AML3-05-0108-3100093	AUTO TESTING LAB OH	2/ 3/93				
D8CML3-05-0097-3100112	LIFE SYSTEMS INC OH	2/23/93				
D8BML3-05-0155-3100124	SHINGOBEE BUILDERS MN	3/ 9/93				
D8BML2-05-0310-3100136	CHAMBERLAIN FY 90 IL	3/17/93				
E8AXP3-05-0031-3400009	PRC EMI (ARMY GOCO) IL	12/14/92				
P8DML0-05-0176-3100088	PEI ASSOC FY 86 OH	1/28/93				
P8DML0-05-0178-3100137	PEI ASSOC FY 87/88 OH	3/17/93				
P8AAP3-05-0147-3400027	EQM (AIR SUB) OH	3/ 2/93				
TOTAL OF REGION 05 = 11						
D8AAL2-06-0195-3100013	LOCKHEED TX	10/26/92				
D8CML3-06-0031-3100014	SOUTHWESTERN PUBLIC SERVICE TX	10/27/92				
D8AML3-06-0065-3100129	RADIAN TX	3/11/93				
D8EML3-06-0088-3100130	TRINITY CONSULTANTS, INC. TX	3/11/93				
D8AML3-06-0066-3100132	TRINITY CONSULTANTS INC. TX	3/11/93				
TOTAL OF REGION 06 = 5						
D8AML2-07-0166-3100000	MRI KS	10/ 7/92				
D8AML2-07-0194-3100001	MIDWEST RESEARCH INSTITUTE MO	10/ 7/92				
D8CWL2-07-0150-3100002	DEV PLAN & RESEARCH ASSOC KS	10/ 7/92				
D8CPL2-07-0151-3100003	DEV PLAN & RESEARCH ASSO KS	10/ 7/92				
D8CML2-07-0148-3100004	DEV PLAN & RESEARCH ASSOC KS	10/ 7/92				

Assignment Control Number	Title		Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)
				Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs	
D8EML3-07-0019-3100017	BLACK & VEACH	MO	10/28/92				
D8AML3-07-0001-3100036	MIDWEST RESEARCH INSTITUTE	MO	11/18/92				
D8AAL3-07-0072-3100106	MRI	MO	2/19/93				
D8AAL3-07-0073-3100150	TRINITY CONSULTANTS	KS	3/30/93				
TOTAL OF REGION 07 = 9							
D8AML2-08-0086-3100023	ROGERS & ASSOC ENG CORP		11/ 4/92				
TOTAL OF REGION 08 = 1							
D8AAL3-09-0022-3100050	SONOMA TECHNOLOGICAL INC PA	CA	12/ 9/92				
D8HLL3-09-0037-3100051	SCS ENGINEERS PA	CA	12/ 9/92				
D8AWL3-09-0036-3100053	TETRA TECH PA	CA	12/15/92				
D8CAL3-09-0070-3100076	ROCKWELL INTL-ROCKETDYNE	CA	1/13/93				
D8AML3-09-0073-3100083	HAMILTON TEST SYSTEM PA	AZ	1/25/93				
D8AML2-09-0318-3100084	STERLING FEDERAL SYSTEMS PA	CA	1/25/93				
D8AAL3-09-0094-3100092	ACUREX ENVIRONMENTAL CORP	CA	2/ 2/93				
D8CBL3-09-0074-3100113	ACUREX ENV. CORP FINAL	CA	2/23/93				
D8CML3-09-0075-3100119	ACUREX ENV CORP FINAL	CA	3/ 5/93				
D8CML3-09-0141-3100146	SAIC FINAL	CA	3/29/93				
D8AWN2-09-0299-3300002	TETRA TECH P.A.	CA	10/29/92				
D8AAN3-09-0092-3300018	SAIC P.A.	CA	2/23/93				
D8AAN3-09-0093-3300019	ENGINEERING SCIENCE	CA	2/25/93				
D8AAN3-09-0091-3300020	ENGINEERING SCIENCE	CA	2/25/93				
D8EMP3-09-0049-3400004	ENERGY & ENVL RES CORP	CA	11/10/92				
TOTAL OF REGION 09 = 15							
P8AXL3-10-0017-3100104	CH2M P.A.	OR	2/11/93				
TOTAL OF REGION 10 = 1							
TOTAL OTHER CONTRACT REPORTS = 103				94,083	0	0	3,098,342
9. SUPERFUND CONTRACTS							
D9CFL2-01-0381-3100006	INDUSTRIAL ECONOMICS, INC.	MA	10/ 8/92				
TOTAL OF REGION 01 = 1							
D9DGL2-02-0094-3100007	TAMS CONSULTANTS INC.	NY	10/ 8/92				
D9BFL2-02-0076-3100019	LEONARD G. BIRNBAUM & COMP.	NJ	11/ 2/92				
D9DFL2-02-0282-3100054	TAMS CONSULTANTS INC.	NY	12/23/92				
D9CFL3-02-0107-3100082	LEONARD BIRNBAUM & COMPANY	NJ	1/25/93				
D9EGL3-02-0082-3100096	TAMS CONSULTANTS, INC.	NY	2/10/93				
D9EGP2-02-0380-3400001	EBASCO	NY	10/ 8/92				
E9BGL0-02-0242-3100145	MALCOLM PIRNIE INC	NY	3/29/93				
M9BGL2-02-0273-3100005	EBASCO	NY	10/ 8/92				
M9EGL2-02-0272-3100008	EBASCO	NY	10/ 8/92				
TOTAL OF REGION 02 = 9							
D9AKL3-03-0016-3100027	APOGEE RESEARCH INC	MD	11/13/92				
D9AKL3-03-0015-3100045	ECG INC	VA	12/ 3/92				
D9BFL2-03-0234-3100085	UNISYS	VA	1/26/93				
D9BFL2-03-0184-3100086	COMPUTER SCIENCE CORP	VA	1/26/93				
D9BFL2-03-0273-3100099	ROY F WESTON	PA	2/11/93				
D9EFL3-03-0125-3100101	COMPUTER SCIENCE CORP	VA	2/11/93				
D9EFL3-03-0141-3100102	COMPUTER SCIENCE CORP	VA	2/11/93				
D9EFL3-03-0142-3100103	COMPUTER SCIENCE CORP	VA	2/11/93				
P9EKN3-03-0096-3300007	ICF CORP	VA	1/21/93				
P9AXN3-03-0111-3300016	ICF INC.	VA	2/19/93				
P9DGN3-03-0113-3300034	ICF, INC. ESAT	VA	3/31/93				
TOTAL OF REGION 03 = 11							
D9BKL3-04-0034-3100010	EHRT	KY	10/ 9/92				
D9AKL3-04-0084-3100094	MANTECH ENVIRONMENTAL	NC	2/ 4/93				
P9DHL2-04-0047-3100012	WESTINGHOUSE HAZTECH	GA	10/ 9/92				
P9BGL2-04-0046-3100015	WESTINGHOUSE HAZTECH	GA	10/28/92				
P9BHL2-04-0353-3100061	ENSITE INC	GA	1/ 5/93				
P9DHL2-04-0352-3100091	ENSITE INC	GA	2/ 2/93				
TOTAL OF REGION 04 = 6							

Assignment Control Number	Title	Final Report Issued	Questioned Costs			Recommended Efficiencies (Funds Be Put To Better Use)	
			Ineligible Costs	Unsupported Costs	Unnecessary/ Unreasonable Costs		
D9AKL3-05-0047-3100074	EQM (RCRA SUB)	OH	1/12/93				
E9AHP2-05-0415-3400000	OHM REM (ADD TO 2400058)	OH	10/ 7/92				
E9EGP2-05-0438-3400011	PSI-JAMMAL	IL	12/23/92				
E9EHP2-05-0278-3400015	OHM REM D/S	OH	1/21/93				
E9EKP1-05-0400-3400040	PRC EMI FY 86-FY 87	IL	3/30/93				
P9DHL1-05-0282-3100155	OHM REM FY 90	OH	3/31/93				
TOTAL OF REGION 05 = 6							
D9AGL3-06-0048-3100056	LOCKHEED ENG. & SCI. CO.	TX	12/30/92				
D9CKN2-06-0194-3300001	LOCKHEED ENGR & SCI	TX	10/26/92				
TOTAL OF REGION 06 = 2							
D9BGL2-07-0132-3100018	SVERDRUP	MO	10/28/92				
D9BGL3-07-0021-3100024	SVERDRUP	MO	11/ 4/92				
D9BGL3-07-0035-3100037	SVERDRUP ENVIRONMENTAL		11/18/92				
D9DGL3-07-0018-3100062	SVERDRUP CORP	MO	1/ 5/93				
D9DFL3-07-0117-3100149	DPRA INC	KS	3/30/93				
TOTAL OF REGION 07 = 5							
D9CGL2-08-0061-3100016	TECHLAW INC	CO	10/28/92				
TOTAL OF REGION 08 = 1							
D9BGL2-09-0134-3100075	BECHTEL GROUP, INC 89 OH&DC CA		1/12/93				
D9BGL2-09-0072-3100079	AQUA TERRA OH & DC FY 89-91 CA		1/20/93				
E9AGP3-09-0083-3400014	ENG COMPUTER OPTECNOMICS	MD	1/19/93				
TOTAL OF REGION 09 = 3							
E9DGP2-10-0081-3400036	CH2M HILL TRAVEL DECREMENT	OR	3/26/93				
P9DGL2-10-0128-3100038	CH2M 1992 FWD PRICING - OH	OR	11/19/92				
P9DHL1-10-0005-3100147	RES 89 OH	OR	3/29/93				
TOTAL OF REGION 10 = 3							
TOTAL SUPERFUND CONTRACT REPORTS			= 47	1,093,753	415,397	0	372,951
TOTAL AUDITS = 722				30,581,246	38,610,968	63,139,392	16,295,956
901 - REPORTS ISSUED BY ASSIGNMENT TYPE AND EPA REGION							
SEMI-ANNUAL PERIOD ENDING 3/31/93							

Appendix 2—Reports Without Management Decision

THE INSPECTOR GENERAL ACT REQUIRES A SUMMARY OF EACH REPORT ISSUED BEFORE THE COMMENCEMENT OF THE REPORTING PERIOD FOR WHICH NO MANAGEMENT DECISION HAS BEEN MADE BY THE END OF THE REPORTING PERIOD (INCLUDING THE DATE AND TITLE OF EACH SUCH REPORT), AN EXPLANATION OF THE REASON SUCH MANAGEMENT DECISION HAS NOT BEEN MADE, AND A STATEMENT CONCERNING THE DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION ON EACH SUCH REPORT (The IG provides the summary, the date and title of each such report. The Agency provides the explanation of the reasons why such management decision has not been made, and a statement concerning the desired timetable for achieving a management decision on each such report.)

IG Followup Status Codes of Agency's Response at 9/30/92

- 1 No Response
- 2 Incomplete Response Received
- 3 Proposed Response Received Awaiting Final Determination
- 4 Proposed Response Received in Review Process
- 5 Final Response Received in Review Process
- 6 Resolution Under Negotiation in Headquarters

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
<u>ASSISTANT ADMINISTRATOR FOR PREVENTION, PESTICIDES AND TOXIC SUBSTANCES</u>			<u>OFFICE OF GENERAL COUNSEL</u>		
E1EPF1-05-0117-1100578	PESTICIDES INERTS	9/27/91	E1JBF1-05-0175-2100443	ERL DULUTH	MM 7/ 7/92
Summary: EPA DID NOT ENSURE (1) ADEQUATE ENFORCEMENT OF ITS INERTS STRATEGY (2) PROMPT REVIEW OF THE POTENTIAL EFFECTS OF INERT INGREDIENTS ON HUMANS AND THE ENVIRONMENT AND (3) THE ACCURACY OF COMPUTERIZED INFORMATION ON INERTS.			Summary: EPA DID NOT ENSURE THAT \$21 MILLION IN CONTRACTS TO SUPPORT THE AGENCY'S DULUTH ENVIRONMENTAL RESEARCH LABORATORY WERE AWARDED AND MONITORED IN THE BEST INTERESTS OF THE GOVERNMENT.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE PROCESS OF ENFORCEMENT BY THE STATES PROVED TO BE MORE COMPLICATED THAN ANTICIPATED. INFORMATION THAT WAS TO BE PROVIDED TO THE STATES WAS DETERMINED TO BE CONFIDENTIAL BUSINESS INFORMATION.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: OIG ACCEPTED THE OFFICE OF ADMINISTRATION AND RESOURCES MANAGEMENT AND THE OFFICE OF RESEARCH AND DEVELOPMENT'S RESPONSE TO THE AUDIT RECOMMENDATIONS. THE OFFICE OF GENERAL COUNSEL WILL ADDRESS THE ONLY OUTSTANDING ISSUES RELATED TO THIS AUDIT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: AN OFFICE OF GENERAL COUNSEL ISSUE PAPER ALLOWED THE ISSUANCE OF THE MANAGEMENT DECISION ON APRIL 8, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
<u>ASSISTANT ADMINISTRATOR FOR ADMINISTRATION AND RESOURCES MANAGEMENT</u>			<u>GRANTS ADMINISTRATION DIVISION</u>		
E1NMF1-04-0169-2100295	EPA MGT OF CSC CONTRACT	3/27/92	E3BST2-03-0452-2400059	CERMA EARLY WARNING	7/ 9/92
Summary: A GENERAL LAISSEZ-FAIRE CULTURE THAT AFFECTED EPA'S MANAGEMENT OF ITS SUPPORT SERVICES CONTRACT WITH COMPUTER SCIENCES CORPORATION LESSENED EPA CONTROL OVER CRITICAL PROGRAM ACTIVITIES AND PERMITTED NUMEROUS PROHIBITED AND IMPROPER ACTIONS BY BOTH AGENCY AND CONTRACTOR STAFFS.			Summary: WE DISCLOSED A POSSIBLE CONFLICT OF INTEREST IN THE AWARDED OF AN EPA COOPERATIVE AGREEMENT TO A NON-PROFIT FIRM. A REVIEW IS IN PROCESS. INTERIM FINDINGS HAVE RESULTED IN AN INVESTIGATIVE REFERRAL.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE AGENCY HAS BEEN WORKING WITH OIG TO RESOLVE OPEN ISSUES. SIGNIFICANT PROGRESS HAS BEEN MADE AND ONLY SEVERAL ITEMS REMAIN OUTSTANDING. ON FEBRUARY 26, 1993 OIG REJECTED OARM'S RESPONSE TO SETTLE TWO ISSUES.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE GRANTS ADMINISTRATION DIVISION REVIEWED EARLY WARNING REPORT AND REQUESTED OIG TO PERFORM A FULL AUDIT. THIS AUDIT IS STILL PENDING.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE RESPONSE IS EXPECTED TO BE COMPLETED BY APRIL 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (Requested audit is in process and draft report expected by end of May 1993.)		
E1NMF1-15-0055-2100591	EPA SYS. SOFTWARE INTEGRITY	9/22/92	E5BKN1-04-0290-2300045	NORTH CAROLINA STATE UNIV. NC	3/26/92
Summary: INADEQUATE EMPHASIS ON MAINFRAME SECURITY AND SOFTWARE INTEGRITY, AND WEAK CONTRACT MANAGEMENT PRACTICES, HAVE INCREASED EPA'S VULNERABILITY TO WASTE, FRAUD AND ABUSE IN ITS			Summary: THIRTY-NINE PROJECTS DID NOT RELATE TO THE GRANT. OER QUESTIONED 12 PROJECTS AS UNSUPPORTED. EXCESS OVERHEAD WAS CLAIMED. CENTER DIRECTOR MISCHARGED TIME.		
HIGHLY SENSITIVE ADP SYSTEMS. ALSO, EPA COULD RECOVER/USE NEARLY \$2.2M WORTH OF DISK STORAGE SPACE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE COMPLEXITY OF THIS AUDIT HAS REQUIRED NUMEROUS MEETINGS WITH OIG, PROGRAM OFFICE, AND NC STATE. THE PROGRAM OFFICE DOES NOT AGREE WITH THE PROPOSED RESOLUTION.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: OIG REQUESTED ADDITIONAL INFORMATION FROM OARM'S INITIAL RESPONSE TO THE AUDIT RECOMMENDATIONS.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: FINAL DETERMINATION EXPECTED ON APRIL 15, 1993.			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]					

Assignment Control Number	Title	Final Report Issued
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N3HVJ1-04-0432-2500251	TENNESSEE STATE OF	TN 12/18/91
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*Summary:

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE AUDIT REPORT WAS ORIGINALLY ASSIGNED TO REGION 4 FOR RESOLUTION. THE GRANT ADMINISTRATION DIVISION IS AWAITING ADDITIONAL INFORMATION FROM RECIPIENT IN RESPONSE TO AUDIT FINDINGS.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY JULY 15, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

DIRECTOR OF ADMINISTRATION, RESEARCH TRIANGLE PARK

E8BML2-03-0179-2100667	E. H. PECHAN	VA 9/30/92
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Summary: WE FOUND NUMEROUS WEAKNESSES SUCH AS AWARDING A CONTRACT TO AN INEXPERIENCED CONTRACTOR, NUMEROUS AMENDMENTS WITH LITTLE OR NO JUSTIFICATION AND POTENTIAL CONFLICT OF INTEREST BETWEEN CONTRACTOR AND EPA GRANTEE. WE QUESTIONED \$441,768 IN INELIGIBLE CONSULTANT, DIRECT LABOR & OTHER COSTS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: OFFICE SENT ITS RESPONSE TO THE OIG ON MARCH 31, 1993. OIG DID NOT ACCEPT RESPONSE. CONTRACTOR MUST PROVIDE ADDITIONAL INFORMATION TO CONTRACTING OFFICER. INFORMATION WILL BE FURNISHED ON 5/31/93.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [2]

OFFICE OF ACQUISITION MANAGEMENT

Cost Review and Rate Negotiation Section

D9EFL2-03-0299-2100309	COMPUTER SCIENCE CORP	VA 4/ 6/92
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Summary: RESTATEMENT OF TWO PRIOR FINDINGS (1) VOLUMINOUS

LABOR TRANSFERS (2) INADEQUATE SUPPORTING DOCUMENTATION FOR LABOR ADJUSTMENTS AND VERBAL AUTHORIZATIONS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A DELAY IN THE RESOLUTION OF THIS AUDIT WAS CAUSED BY THE DEPARTMENT OF DEFENSE BEING THE COGNIZANT AGENCY FOR CSC, RATHER THAN EPA. THE CORRECTIVE ACTION PLAN FOR THE RECOMMENDATIONS TO THIS AUDIT HAVE BEEN APPROVED.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (Additional audits have been requested and completed by DCAA. When the requested reports are resolved the issues of these reports will be resolved also.)

D9EFL2-03-0300-2100310	COMPUTER SCIENCE CORP	VA 4/ 6/92
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Summary: SIX INTERNAL CONTROL WEAKNESSES WERE REPORTED: PAYROLL PROCEDURES, RECORDS, SEGREGATION OF DUTIES, BILLING AND TIMEKEEPING RECORDS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A DELAY IN THE RESOLUTION OF THIS AUDIT WAS CAUSED BY THE DEPARTMENT OF DEFENSE BEING THE COGNIZANT AGENCY FOR CSC, RATHER THAN EPA. A REVIEW OF THE LABOR CHARGING PRACTICES MUST STILL BE COMPLETED. THE CORRECTIVE ACTION PLAN FOR THE RECOMMENDATIONS TO THIS AUDIT HAVE BEEN APPROVED.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (Additional audits have been requested and completed by DCAA. When the requested reports are resolved the issues of these reports will be resolved also.)

Assignment Control Number	Title	Final Report Issued
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D8DML2-02-0121-2100404	MALCOLM PIRNIE INC	NY 6/10/92
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*Summary:

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE DEPARTMENT OF LABOR HAS TAKEN ISSUE WITH SOME OF THE COSTS ASSOCIATED WITH THIS AUDIT. NEGOTIATIONS ARE PENDING. THIS AUDIT CANNOT BE RESOLVED UNTIL THE DEPARTMENT OF LABOR LAW SUIT IS SETTLED.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status and does not expect a response until the litigation has been completed.)

D8DML2-02-0122-2100405	MALCOLM PIRNIE INC	NY 6/10/92
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*Summary:

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE DEPARTMENT OF LABOR HAS TAKEN ISSUE WITH SOME OF THE COSTS ASSOCIATED WITH THIS AUDIT. NEGOTIATIONS ARE PENDING. THIS AUDIT CANNOT BE RESOLVED UNTIL THE DEPARTMENT OF LABOR LAW SUIT IS SETTLED.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status and does not expect a response until the litigation has been completed.)

P2DW*8-03-0174-1300105	PHILADELPHIA CITY OF	PA 9/12/91
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Summary: PWD CLAIMED THAT OPERATING COSTS WERE ALLOCABLE TO EPA GRANTS, BUT ALSO CHARGED THESE SAME COSTS TO THEIR CUSTOMERS THROUGH THEIR WATER AND SEWER RATES.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG IS RESEARCHING INTERNAL EPA APPEAL PROCEDURES BECAUSE OF LEGAL ISSUES INVOLVED. RESOLUTION OF THIS AUDIT IS PENDING REVIEW OF THESE LEGAL ISSUES. ONCE THESE ISSUES ARE RESOLVED, STEPS TO CLOSE THIS AUDIT WILL CONTINUE.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P8AAL2-03-0072-2100087	ICF CORP	VA 12/ 4/91
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Summary: (PREAWARD AUDIT UNDER NEGOTIATION)

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS CONTRACT HAS NOT BEEN AWARDED.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE CONTRACT IS EXPECTED TO BE AWARDED BY APRIL 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P9AKN2-03-0547-2300092	ICF CORP	VA 9/30/92
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Summary: (PREAWARD AUDIT UNDER NEGOTIATION)

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT AWARD DETERMINATION HAS NOT BEEN MADE.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)

D8EML2-03-0302-2100315	GILBERT ASSOCIATES INC	PA 4/ 7/92
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Summary: DCAA DETERMINED THAT GILBERT COMMONWEALTH OWES THE FEDERAL GOVERNMENT \$2,538,438 AS A CREDIT REFUND DUE TO THE TERMINATION OF A DEFINED BENEFIT PENSION PLAN AND EPA HAS A PORTION OF \$1,285.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P8ASL2-03-0329-2100390	ICF CORP	VA 5/27/92	D8DML2-04-0182-2100420	CLAUDE TERRY & ASSOCIATES	GA 6/17/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			*Summary:		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACT HAS NOT BEEN AWARDED.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS CONTRACT IS IN ACTIVE NEGOTIATIONS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
P8AML2-03-0357-2100419	ICF CORP	VA 6/16/92	D8DML2-04-0136-2100422	CLAUDE TERRY & ASSOCIATES	GA 6/17/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			*Summary:		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT AWARD DETERMINATION HAS NOT BEEN MADE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS CONTRACT IS IN ACTIVE NEGOTIATIONS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D8DML2-03-0549-2100536	VIGYAN INC	VA 8/31/92	D8DML2-04-0181-2100423	CLAUDE TERRY & ASSOCIATES	GA 6/17/92
Summary: DCAA AUDITED THE DIRECT AND INDIRECT COSTS FOR CY1988. THE AUDIT OF DIRECT COSTS DISCLOSED NO EXCEPTIONS. DCAA DID NOT QUESTION ANY COSTS IN THE OH EXPENSE POOLS. DCAA QUESTIONED .1% OF THE G&E EXPENSE POOL RELATED TO DIRECT LABOR IN THE ALLOCATION BASE.			*Summary:		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: NEGOTIATIONS COMPLETE. AWAITING CONTRACTOR TO SIGN AGREEMENT AND RETURN.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS CONTRACT IS IN ACTIVE NEGOTIATIONS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: EXPECT CLOSURE BY APRIL 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D8EML2-03-0563-2100619	ROY F WESTON	PA 9/16/92	D9BGL2-04-0368-2100587	VESTA TECHNOLOGY LTD	FL 9/ 9/92
Summary: DCAA FOUND THAT THE CONTRACTOR'S INTERNAL CONTROLS PERTAINING TO THE ACCOUNTING SEGREGATION AND DELETION OF UNALLOWABLE COSTS AS REQUIRED BY FAR 31.201-6 AND CAS 405 ARE INADEQUATE.			Summary: VESTA PROVIDED INCINERATION SERVICES TO REIDEL ENVIRONMENTAL SERVICES. DELAY CLAIM DUE TO FAILED TEST BURNS & DEMOBILIZATION. \$113 THOUSAND QUESTIONED ON DELAY. \$129 THOUSAND QUESTIONED ON EXTENDED OVERHEAD. \$264 THOUSAND UNAUDITED SUB CONTRACTOR (FLINT). \$88 THOUSAND PROFIT QUESTIONED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
P8AAN2-03-0445-2300059	ICF CORP	VA 7/16/92	P8DML0-05-0421-2100376	PEI ASSOC FY 90	OH 5/20/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			Summary: THE AUDIT QUESTIONED ABOUT \$100,000 AS INELIGIBLE AND \$248,000 AS UNSUPPORTED. IN ADDITION, \$980,000 IS UNAUDITED PENDING RECEIPT OF A REPORT FROM DCAA.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACTOR MUST REVISE ITS POLICY AND PROCEDURES AND SEND TO EPA FOR EVALUATION. ONCE THIS IS RECEIVED, PROCEDURES TO CLOSE THIS AUDIT WILL CONTINUE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE AUDIT IS AWAITING REVIEW OF GENERAL AND ADMINISTRATIVE COSTS. ONCE DCAA AUDIT COMPLETES REVIEW OF CORPORATE ALLOCATION IS COMPLETE, THE AUDIT WILL BE CLOSED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)		

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P8DML1-05-0189-2100528 PEI ASSOC FY 85		OH 8/20/92	P9DHL9-10-0174-2100504 CH2M 88 OH		OR 7/30/92
Summary: WE HAVE QUESTIONED \$130,000 INELIGIBLE AND \$362,546 IN UNSUPPORTED THE PROPOSED INDIRECT RATES WERE ADJUSTED ACCORDINGLY.			Summary: COSTS QUESTIONED OF \$17,150,592 ARE UNALLOWABLE FOR FEDERAL PARTICIPATION. SIGNIFICANT INTERNAL CONTROL AND COMPLIANCE WEAKNESSES WERE ALSO NOTED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: PEI HAS PROVIDED CONTRACTING OFFICER WITH ADDITIONAL DOCUMENTATION FOR REVIEW. A SUPPLEMENTAL AUDIT HAS BEEN REQUESTED. THE OIG WILL PERFORM THE AUDIT AND ISSUE SUPPLEMENTAL REPORT. ONCE SUPPLEMENTAL AUDIT IS RECEIVED, PROCEDURES TO CLOSE AUDIT WILL CONTINUE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: NEGOTIATIONS ARE EXPECTED TO BE COMPLETED ON APRIL 21, 1993. POST NEGOTIATION MEMORANDUMS WILL BE FORWARDED TO THE OIG.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (The OIG received the above March 1, 1993 request for a supplemental audit. We reviewed the response submitted to EPA by PEI and determined that no further audit work was necessary or appropriate. We responded to EPA on March 17, 1993 with recommended adjustments. We considered this letter satisfactory to respond to EPA's request. EPA still has to respond to the initial audit report above.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P8BMP1-05-0335-2400073 PEI ASSOC (FY 85)		OH 9/ 9/92	P9DHL0-10-0085-2100505 CH2M 89 OH		OR 7/30/92
Summary: THE REVIEW FOUND \$224,781 OF INELIGIBLE AND \$195,886 OF UNSUPPORTED COSTS.			Summary: COSTS QUESTIONED OF \$16,474,583 ARE UNALLOWABLE FOR FEDERAL PARTICIPATION SIGNIFICANT INTERNAL CONTROL AND COMPLIANCE WEAKNESSES WERE ALSO NOTED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: PEI HAS PROVIDED CONTRACTING OFFICER WITH ADDITIONAL DOCUMENTATION. A SUPPLEMENTAL AUDIT HAS BEEN REQUESTED. THE OIG WILL PERFORM THE AUDIT AND ISSUE SUPPLEMENTAL REPORT. ONCE SUPPLEMENTAL AUDIT IS RECEIVED, PROCEDURES TO CLOSE AUDIT WILL CONTINUE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: NEGOTIATIONS ARE EXPECTED TO BE COMPLETED ON APRIL 21, 1993. POST NEGOTIATION MEMORANDUMS WILL BE FORWARDED TO THE OIG.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (The OIG received the above March 1, 1993 request for a supplemental audit. We reviewed the response submitted to EPA by PEI and determined that no further audit work was necessary or appropriate. We responded to EPA on March 17, 1993 with recommended adjustments. We considered this letter satisfactory to respond to EPA's request. EPA still has to respond to the initial audit report above.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P9DHL9-10-0110-1100108 RES FY86 INDIRECT COSTS		OR 1/24/91	P9DHL9-10-0148-2100642 RES 88 OH		OR 9/28/92
*Summary:			Summary: RES INCLUDED INELIGIBLE COSTS IN ITS PROPOSED 1988 FINAL INDIRECT COST RATES. AS A RESULT RES MAY HAVE BEEN REIMBURSED FOR UNALLOWABLE COSTS UNDER EPA CONTRACTS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG ASKED THAT NEGOTIATIONS BE SUSPENDED PENDING THE RESOLUTION OF OTHER ISSUES THAT MAY IMPACT THE OUTCOME OF THIS AUDIT. ONCE THESE ISSUES ARE RESOLVED, STEPS TO CLOSE THIS AUDIT WILL CONTINUE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG ASKED THAT NEGOTIATIONS BE SUSPENDED PENDING THE RESOLUTION OF OTHER ISSUES THAT MAY IMPACT THE OUTCOME OF THIS AUDIT. OIG WILL ISSUE REVISED AUDIT REPORTS. ONCE THESE ISSUES ARE RESOLVED, STEPS TO CLOSE THIS AUDIT WILL CONTINUE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status and does not expect a response until the review has been completed.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status and does not expect a response until the review has been completed. The OIG does not issue revised reports.)		
P9DHL0-10-0096-2100304 RES 87 OH		OR 3/31/92	<u>OFFICE OF ACQUISITION MANAGEMENT</u>		
*Summary:			<u>Durham Contracts Management Division</u>		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG ASKED THAT NEGOTIATIONS BE SUSPENDED PENDING THE RESOLUTION OF OTHER ISSUES THAT MAY IMPACT THE OUTCOME OF THIS AUDIT. ONCE THESE ISSUES ARE RESOLVED, STEPS TO CLOSE THIS AUDIT WILL CONTINUE.			D8AML2-03-0399-2100603 EXPERIMENTAL PATHOLOGY LABS 9/10/92		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status and does not expect a response until the review has been completed.)			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: NEGOTIATIONS HAVE BEEN CONCLUDED AND A SOURCE SELECTED. THE CONTRACT FILE IS UNDER REVIEW.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: AN AWARD TO ANOTHER FIRM IS EXPECTED BY MAY 1, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: AN AWARD TO ANOTHER FIRM IS EXPECTED BY MAY 1, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P9DH*8-10-0080-2100503 CH2M 87 OH		OR 7/30/92	D8CAL2-03-0433-2100604 ENERGY AND ENVIRONMENTAL VA 9/10/92		
Summary: COSTS QUESTIONED OF \$7,126,600 ARE UNALLOWABLE FOR FEDERAL PARTICIPATION. SIGNIFICANT INTERNAL CONTROL AND COMPLIANCE WEAKNESSES WERE ALSO NOTED.			Summary: THE CONTRACTOR'S FINAL VOUCHER INCLUDED COSTS IN EXCESS OF CONTRACT LIMITATIONS TOTALING \$51,622.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS CONTRACT CLOSE OUT HAS COST QUESTIONED DUE TO CONTRACT OVERRUN. IN ADDITION, THE FEE MUST BE ADJUSTED SINCE LEVEL OF EFFORT WAS NOT MET. THE CONTRACTOR HAS BEEN REQUESTED TO PROVIDE DATA FOR CONTRACTOR OFFICER DECISION ON BOTH ISSUES.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: NEGOTIATIONS ARE EXPECTED TO BE COMPLETED ON APRIL 21, 1993. POST NEGOTIATION MEMORANDUMS WILL BE FORWARDED TO THE OIG.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY MAY 15, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		

Assignment Control Number	Title	Final Report Issued
D8CPL2-03-0432-2100620	MIRANDA ASSOCIATES INC	DC 9/16/92
Summary: DCAA QUESTIONED \$278,979 DUE TO 1) THE LIMITATIONS OF FUNDS CLAUSE, 2) OVERSTATED OVERHEAD COSTS, AND 3) A COMPUTATIONAL ERROR.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACT HAS BEEN CLOSED OUT. INDIRECT COST QUESTIONED DUE TO CLAIMS IN EXCESS OF CONTRACT CEILING. IN ADDITION, FEE DETERMINATION MUST BE MADE UNDER LEVEL OF EFFORT. THE CONTRACTOR REQUESTED TO CERTIFY LEVEL OF EFFORT SO THAT A CONTRACTOR OFFICER DECISION CAN BE MADE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY MAY 14, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D8AML2-04-0335-2100440	ALPHA-GAMMA TECHNOLOGIES INCNC	6/25/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE COMPETITIVE RANGE HAS NOT BEEN ESTABLISHED BECAUSE THE TECHNICAL EVALUATION PANEL HAS NOT RESPONDED TO REVIEW COMMENTS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE PROJECTED AWARD DATE IS JUNE 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D8AML2-04-0242-2100467	EC/R INC.	NC 7/10/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE COMPETITIVE RANGE HAS NOT BEEN ESTABLISHED BECAUSE THE TECHNICAL EVALUATION PANEL HAS NOT RESPONDED TO REVIEW COMMENTS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE PROJECTED AWARD DATE IS JUNE 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D8AML2-04-0362-2100474	ANALYTICAL TESTING CONSULT	NC 7/15/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE COMPETITIVE RANGE HAS NOT BEEN ESTABLISHED BECAUSE THE TECHNICAL REVIEW PANEL HAS NOT RESPONDED TO REVIEW COMMENTS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE PROJECTED AWARD DATE IS JUNE 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P8AMP2-05-0301-2400052	EQM (AIR)	OH 7/ 2/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE COMPETITIVE RANGE HAS NOT BEEN ESTABLISHED BECAUSE THE TECHNICAL EVALUATION PANEL HAS NOT RESPONDED TO REVIEW COMMENTS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE PROJECTED AWARD DATE IS JUNE 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D8AML2-09-0175-2100457	MAXWELL LABORATORIES INC PA CA	7/ 7/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE PROCUREMENT WAS PUT ON HOLD DUE TO A DELAY IN APPROVAL OF THE PROCUREMENT REQUEST, WHICH WAS RECEIVED IN NOVEMBER 1992.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE PROJECTED AWARD DATE IS JUNE 15, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		

OCTOBER 1, 1992 THROUGH MARCH 31, 1993

Assignment Control Number	Title	Final Report Issued
OFFICE OF ACQUISITION MANAGEMENT		
Financial Analysis Branch		
D9BFL2-03-0367-2100622	COMPUTER SCIENCE CORP	VA 9/17/92
Summary: DCAA QUESTIONED 7,692 LABOR HOURS IN EXCESS OF THOSE AUTHORIZED IN THE CONTRACT. DCAA WAS UNABLE TO DETERMINE IF HOURS BILLED WERE IN ACCORDANCE WITH THE DOPO'S MEMORANDUM.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACTING OFFICER IS AWAITING CONTRACTOR RESPONSE TO ISSUES IN DCAA AUDIT REPORT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA)		
P88MN1-03-0146-2300014	O&R MANAGEMENT CORPORATION	MD 11/ 5/91
Summary: O&R MANAGEMENT CLAIMED \$557,442 OF OTHER DIRECT COSTS. ONE HUNDRED PERCENT OF THE CONTRACT WAS QUESTIONED BECAUSE O&R DID NOT MAINTAIN RECORDS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACTING OFFICER IS WRITING A DECISION ON THE DISALLOWANCE OF COST CLAIMED BY CONTRACTOR IN AUDIT REPORT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THIS AUDIT SHOULD BE CLOSED SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D8EMP2-03-0309-2400071	COMPUTER SCIENCE CORP	VA 9/ 9/92
Summary: THE LABOR ADJUSTMENTS SELECTED DURING DCAA'S AUDIT WERE UNACCEPTABLE BECAUSE THE CONTRACTOR DID NOT PROVIDE SUFFICIENT CORROBORATING EVIDENCE.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A RESPONSE TO THE DCAA LABOR ADJUSTMENT AUDIT IS BEING PREPARED. SUBSEQUENT TO THIS RESPONSE, DCAA WILL PERFORM A FINAL DIRECT COST AUDIT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: ONCE RESOLUTION OF AUDIT #2400072 OCCURS, THIS AUDIT WILL BE RESOLVED.		
IG FOLLOWUP STATUS AS OF 3/31/93 [3]		
D9EFP2-03-0308-2400072	COMPUTER SCIENCE CORP	VA 9/ 9/92
Summary: DCAA'S AUDIT DISCLOSED NUMEROUS INADEQUATELY EXPLAINED AND DOCUMENTED LABOR ADJUSTMENTS FROM 68-01-6360, 68-01-3840, 68-01-6363, AND 68-01-6639.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: DCAA WAS PROVIDED A DRAFT RESPONSE AND BEGAN CALCULATING A REVISED POSITION. ANALYSIS OF THE INITIAL IMPACTS RESULTED IN UNDISCLOSED AUDIT ISSUES. A MEETING WITH DCAA IS PLANNED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [3]		
P9AHN9-05-0347-0300036	OH MATERIALS (PR EQ RATES)	OH 3/27/90
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: NEGOTIATIONS ARE PENDING. EPA REQUESTED FURTHER AUDITS ON THE CONTRACTOR'S EQUIPMENT UTILIZATION RATES FOR 1990 IN ORDER TO RESOLVE THESE COSTS. RATES FROM 1987 THROUGH 1989 SHOULD BE RESOLVED WITHIN TWELVE MONTHS FROM RECEIPT OF THESE AUDITS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (Ongoing audits on the contractor's equipment utilization rates will not help in the resolution of this audit since the audits involve different fiscal periods.)		

Assignment Control Number	Title	Final Report Issued
P9AHN0-05-0260-0300047	OH MATERIALS (PR EQ RATES)	OH 4/27/90
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: AWAITING CONTRACTOR PROPOSAL TO FIX FINAL EQUIPMENT RATES SINCE SEPTEMBER 1992. CONTRACTOR INFORMED THAT EPA WILL PROCEED TO UNILATERALLY SET RATES IF NO RESPONSE IS RECEIVED BY APRIL 17, 1993.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)		
D9BGL2-05-0342-2100609	WARZYM ENG	WI 9/14/92
Summary: THE CONTRACTOR'S FINAL VOUCHER INCLUDED \$40,420 IN ALLOWABLE COSTS IN EXCESS OF CONTRACT LIMITATION.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACTING OFFICER HAS DETERMINED THAT CONTRACTOR IS ENTITLED TO QUESTIONED COSTS IN EXCESS OF CONTRACT FUNDING PENDING SUPERVISORY APPROVAL. THE PROJECT OFFICER IS IN THE PROCESS OF AUTHORIZING ADDITIONAL FUNDING TO PAY THE FINAL CLAIMED CONTRACT COST.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)		
P9AHN1-05-0144-2300023	OHM REM ERCS2 Z2 FY 89	OH 12/26/91
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CONTRACTING OFFICER HAS BEEN AWAITING CONTRACTOR PROPOSAL TO FIX FINAL EQUIPMENT RATES SINCE SEPTEMBER 1992. CONTRACTOR INFORMED THAT EPA WILL PROCEED TO UNILATERALLY SET RATES IF NO RESPONSE IS RECEIVED BY APRIL 17, 1993.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)		
P9AHN1-05-0143-2300024	OHM REM ERCS2 Z1 FY 89	OH 12/27/91
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: NEGOTIATIONS ARE STILL PENDING. EPA REQUESTED FURTHER AUDITS ON THE CONTRACTOR'S EQUIPMENT UTILIZATION RATES FOR 1990 IN ORDER TO RESOLVE THESE COSTS. RATES FROM 1987 THROUGH 1989 SHOULD BE RESOLVED WITHIN TWELVE MONTHS FROM RECEIPT OF THESE AUDITS.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (Ongoing audits on the contractor's equipment utilization rates will not help in the resolution of this audit since the audits involve different fiscal periods.)		
P8BMP0-05-0422-2400046	PEI ASSOC FY 90	OH 6/ 2/92
Summary: REVIEW OF INCURRED COSTS IS INCOMPLETE BECAUSE AUDITED INDIRECT RATES HAVE NOT BEEN FINALIZED AND APPLIED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: PEI HAS PROVIDED EPA WITH ADDITIONAL DATA/DOCUMENTATION FOR REVIEW. A SUPPLEMENTAL AUDIT HAS BEEN REQUESTED. THE OIG WILL PERFORM AUDIT AND ISSUE SUPPLEMENTAL REPORT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THIS AUDIT SHOULD BE RESOLVED BY JUNE 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]		

Assignment Control Number	Title	Final Report Issued
D8CML2-09-0319-2100524	GEO RESOURCE CONSULTANTS FN CA	8/12/92
*Summary:		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: ORIGINAL DCAA REPORT ISSUED BY THE OIG WAS INCOMPLETE IN THAT THE REPORT DID NOT ADDRESS ALL OF THE COSTS CLAIMED UNDER THE CONTRACT. A SUPPLEMENTAL DCAA REPORT WAS ISSUED TO ADDRESS THE CLAIMED COSTS. THE CONTRACTING OFFICER IS PREPARING NEGOTIATION POSITION.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for reaching a management decision was not provided by EPA.)		
OFFICE OF ACQUISITION MANAGEMENT		
Washington Cost Advisory Branch		
P8AML2-03-0152-2100146	ICF CORP	VA 12/20/91
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D9AKL2-03-0115-2100169	DYNAMAC	MD 1/ 6/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D9AKL2-03-0120-2100181	APEX ENVIRONMENTAL	MD 1/ 6/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT AWARD DETERMINATION HAS NOT BEEN MADE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D8AML2-03-0124-2100185	EG&G WASHINGTON ANALYTICAL	MD 1/ 6/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE:		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
D9AGL2-03-0305-2100490	NUS CORP - HALLIBURTON	PA 7/23/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT AWARD DETERMINATION HAS NOT BEEN MADE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
D9AFL2-03-0240-2100557 UNISYS		VA 9/ 4/92	Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: DCAA IS CURRENTLY PERFORMING AN INCURRED COST AUDIT ON THE CONTRACT. AUDIT STATUS IS PENDING OUTCOME.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARDED EXPECTED SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (A desired timetable for achieving a management decision was not provided by EPA.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
D9AKN2-03-0488-2300083 BRUCE COMPANY		DC 9/29/92	P9AHP2-05-0052-2400010 SANSER SERVICES ERCS3 R5		OH 12/26/91
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARD EXPECTED SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARD EXPECTED SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P9AHN1-05-0191-1300085 OHM REM ERCS3 R1		OH 7/ 9/91	P9AHP2-05-0306-2400058 OHM REM ERCS3 R		OH 7/23/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT NEGOTIATIONS ARE ONGOING.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT NEGOTIATIONS ARE ONGOING.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)		
P9AHP1-05-0313-1400035 OHM REM ERCS3 R2		OH 9/ 6/91	P9AHP2-05-0350-2400063 MAECORP ERCS3 R5		IL 8/11/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT NEGOTIATIONS ARE ONGOING.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARD EXPECTED SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
P9AHP1-05-0313-1400036 OHM REM ERCS3 R2		OH 9/ 6/91	P9AGL2-10-0079-2100607 RES PRE-AWARD		OR 9/11/92
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			Summary: (PREAWARD AUDIT UNDER NEGOTIATION)		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT NEGOTIATIONS ARE ONGOING.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARD EXPECTED SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (An explanation was not provided by EPA relating to the reasons a management decision had not been made at 3/31/93. A desired timetable for achieving a management decision was also not provided.)			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
E9AHP2-05-0036-2400001 EQM ERCS3 R5		OH 11/27/91	REGION 1, REGIONAL ADMINISTRATOR		
Summary: (PREAWARD AUDIT UNDER NEGOTIATION)			E3BWL1-01-0178-2100522 RI ESTUARY PROGRAM GRANTS RI 8/11/92		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: CONTRACT HAS NOT BEEN AWARDED.			Summary: A TOTAL OF \$198,111 IS QUESTIONED; VARIOUS WEAKNESSES IN THE GRANTEE'S INTERNAL CONTROLS ARE ALSO REPORTED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: CONTRACT AWARD EXPECTED SEPTEMBER 30, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION AND THE OIG HAVE REACHED AGREEMENT ON MOST ISSUES IN THIS INTERIM AUDIT. DISCUSSION AND AGREEMENT BETWEEN THE REGION, STATE AND OIG WILL BE COMPLETE BY APRIL 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION OF THIS AUDIT IS EXPECTED BY MAY 31, 1993.		
P9AHP2-05-0054-2400007 MARS E/S ERCS3 R5		IL 12/18/91	IG FOLLOWUP STATUS AS OF 3/31/93 [2]		

REGION 2, REGIONAL ADMINISTRATOR

P5BGL0-02-0278-2100134 EQB PR 12/19/91
Summary: THE TOTAL CLAIM OF \$248,063 WAS NOT SUPPORTED BY ADEQUATE SOURCE DOCUMENTATION FOR US TO AUDIT THE CLAIM.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: AUDITOR QUESTIONED ALL GRANTEE COSTS AS UNSUPPORTED FOR LACK OF RECORDS, REPORTEDLY DESTROYED IN HURRICANE. EQB SUBSEQUENTLY FOUND SOME DOCUMENTATION. REGION AND OIG ARE HAVING CPA TO EVALUATE THE DOCUMENTATION.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY SEPTEMBER 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [2]

P2CWL9-02-0231-2100399 TONAWANDA NY 6/ 9/92
Summary: THE GRANTEE CLAIMED \$409,391 OF INELIGIBLE COST AND \$566,507 OF UNSUPPORTED COST FOR CONSTRUCTION OF A PUMPING STATION, FORCE MAIN AND INTERCEPTOR SEWER LINE.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION IS THE DELEGATED AGENCY RESPONSIBLE FOR DRAFTING THIS AUDIT RESOLUTION FOR THE REGION. A HIGH VOLUME OF AUDITS AND VERY LIMITED STAFF AT NYSDEC HAS CAUSED A DELAY IN THE RESOLUTION OF THIS AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2CWL9-02-02047-2100400 ERIE COUNTY - SOUTHTOWNS NY 6/ 9/92
Summary: THE GRANTEE CLAIMED \$171,699 OF INELIGIBLE COST AND \$90,190 OF UNSUPPORTED COST FOR CONSTRUCTION OF AN ADVANCED WASTEWATER TREATMENT PLANT, INTERCEPTOR SEWERS AND PUMP STATIONS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION IS THE DELEGATED AGENCY RESPONSIBLE FOR DRAFTING THIS AUDIT RESOLUTION FOR THE REGION. A HIGH VOLUME OF AUDITS AND VERY LIMITED STAFF AT NYSDEC HAS CAUSED A DELAY IN THE RESOLUTION OF THIS AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2CWL9-02-0341-2100402 SARATOGA COUNTY SEWER NY 6/ 9/92
Summary: THE GRANTEE CLAIMED \$266,624 OF INELIGIBLE COST AND \$29,906 OF UNSUPPORTED COST FOR CONSTRUCTION OF AN INTERCEPTOR AND COLLECTION SYSTEM AND CONSTRUCTION OF A MAINTENANCE AND FACILITY BUILDING.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION IS THE DELEGATED AGENCY RESPONSIBLE FOR DRAFTING THIS AUDIT RESOLUTION FOR THE REGION. A HIGH VOLUME OF AUDITS AND VERY LIMITED STAFF AT NYSDEC HAS CAUSED A DELAY IN THE RESOLUTION OF THIS AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2CWL0-02-0149-2100448 NIAGARA COUNTY SD1 NY 7/ 5/92
Summary: THE GRANTEE CLAIMED \$75,549 OF INELIGIBLE COST AND \$938,238 OF UNSUPPORTED COST FOR CONSTRUCTION OF A WASTEWATER TREATMENT PLANT, INTERCEPTOR SEWERS AND PUMP STATIONS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION IS THE DELEGATED AGENCY RESPONSIBLE FOR DRAFTING THIS AUDIT RESOLUTION FOR THE REGION. A HIGH VOLUME OF AUDITS AND VERY LIMITED STAFF AT NYSDEC HAS CAUSED A DELAY IN THE RESOLUTION OF THIS AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2BW*8-02-0017-2100449 NYC - NORTH RIVER NY 7/ 5/92
Summary: THE GRANTEE CLAIMED \$2,661,322 OF INELIGIBLE COSTS AND \$11,814,277 OF UNSUPPORTED COSTS FOR THE CONSTRUCTION OF THE NORTH RIVER WASTEWATER WATER TREATMENT PLANT AND A SLUDGE VESSEL.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION IS THE DELEGATED AGENCY RESPONSIBLE FOR DRAFTING THIS AUDIT RESOLUTION FOR THE REGION. A HIGH VOLUME OF AUDITS AND A HIGH AMOUNT OF QUESTIONED COSTS CAUSED A DELAY IN THE RESOLUTION OF THIS AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [4]

E9BHL1-02-0114-2100586 ERCS - S&D ENVIRONMENTAL NJ 9/ 9/92
Summary: THE MINI-ERCS CONTRACTOR CLAIMED \$561,118 OF QUESTIONED COSTS CONSISTING OF \$30,241 OF INELIGIBLE AND \$539,877 OF UNSUPPORTED COSTS IN PERFORMANCE SUPERFUND CLEANUP ACTIVITIES.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION SUBMITTED A DRAFT RESOLUTION TO OIG ON FEBRUARY 25, 1993. THE OIG RAISED QUESTIONS AND IS PREPARING MEMORANDUM TO THE REGION LISTING ADDITIONAL INFORMATION REQUIRE FOR FINAL RESOLUTION.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION IS EXPECTED TO BE ISSUED BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

REGION 3, REGIONAL ADMINISTRATOR

P2CWM0-03-0270-2200023 LEESBURG VA 7/23/92
Summary: TOWN OF LEESBURG, VA CLAIMED \$395,602 OF COSTS IN EXCESS OF THE GRANTS AMOUNTS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: REGION ISSUED FINAL DETERMINATION LETTER TO GRANTEE ON FEBRUARY 2, 1993.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [3] (The audit was closed on April 5 1993.)

P2CWM0-03-0114-2200041 BERKELEY COUNTY PSD WV 9/30/92
Summary: COSTS OF \$517,956 WERE INELIGIBLE PRIMARILY BECAUSE THE GRANTEE CLAIMED \$219,488 OF INELIGIBLE CHANGE ORDERS AND \$169,091 OF COSTS INCURRED BEYOND THE CUT-OFF DATE.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS AUDIT WAS ISSUED ON SEPTEMBER 30, 1992 AND CLOSED (APRIL 1, 1993.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [5] (The OIG received the management decision on March 30, 1993 and closed the report on April 1, 1993.)

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P60WNO-03-0261-2300046	DC GOVERNMENT	DC 3/31/92	P2CWP9-05-0075-1400037	GARY SD	IN 9/ 9/91
Summary: REVIEW OF THE WASHINGTON TIMES ALLEGATIONS CONCERNING THE BLUE PLAINS TREATMENT PLANT DISCLOSED CONTRACT OVERRUNS OF \$21 MILLION. IN ADDITION, EXCESSIVE DELAYS OCCURRED BECAUSE OF PROCUREMENT POLICIES AND PRACTICES.			Summary: ALMOST \$2.8 MILLION WASTED WHEN THE GRANTEE FAILED TO OPERATE AND MAINTAIN A WASTEWATER TREATMENT PLANT.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A MULTITUDE OF ISSUES TOTALING \$8.5 MILLION REQUIRED EXTRAORDINARY TIME TO REVIEW AND RESOLVE. THE OIG DISAGREED WITH MANAGEMENT'S PROPOSED FINAL DETERMINATION AND REQUESTS ADDITIONAL DOCUMENTATION FROM THE CORPS OF ENGINEERS.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE ENTIRE GRANT OF \$33 MILLION WAS QUESTIONED DUE TO ALLEGED IMPROPER PLANT OPERATION AND VIOLATION OF NPDES. GRANTEE PROVIDED VOLUMINOUS DOCUMENTATION TWO WEEKS BEFORE FINAL DETERMINATION DUE DATE. A CONSENT DECREE GIVES GARY UNTIL 1994 TO COMPLY.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY MAY 15, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [2] (The OIG determined the response to be inadequate)			IG FOLLOWUP STATUS AS OF 3/31/93 [3]		
P2CWN1-03-0123-2300062	PHILADELPHIA CITY OF	PA 7/23/92	P2CWP8-05-0026-1400038	GARY SD	IN 9/ 9/91
Summary: THE CITY OF PHILADELPHIA WATER DEPARTMENT CLAIMED MORE THAN \$20 MILLION OF INELIGIBLE COSTS INCLUDING \$8.7 MILLION OF COSTS ASSOCIATED WITH ABANDONED SYSTEMS AND EQUIPMENT.			Summary: ALMOST \$25 MILLION WASTED WHEN THE GRANTEE FAILED TO OPERATE AND MAINTAIN A WASTEWATER TREATMENT PLANT.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE SIZE AND COMPLEXITY OF THIS MEGA-AUDIT, INVOLVING SEVERAL GRANTS, WILL REQUIRE MUCH TIME TO RESOLVE. MEETINGS AND CORRESPONDENCE WITH GRANTEE ARE ONGOING.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE ENTIRE GRANT OF \$33 MILLION WAS QUESTIONED DUE TO ALLEGED IMPROPER PLANT OPERATION AND VIOLATION OF NPDES. GRANTEE PROVIDED VOLUMINOUS DOCUMENTATION TWO WEEKS BEFORE FINAL DETERMINATION DUE DATE. A CONSENT DECREE GIVES GARY UNTIL 1994 TO COMPLY.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS EXPECTED TO BE ISSUED BY SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [3]		
<u>REGION 4, REGIONAL ADMINISTRATOR</u>					
E2CWN1-04-0052-1300086	HILLSBOROUGH CTY	FL 7/17/91	P2CWN0-05-0032-2300074	WASHTENAW CO DPW	MI 9/ 4/92
Summary: THE GRANTEE RECEIVED EPA FUNDS TO EXPAND THEIR WASTEWATER TREATMENT PLANT. WE DID NOT FIND JUSTIFICATION FOR THE EXPANSION. THEREFORE, WE QUESTIONED 84% OF THE EXPANSION COST THAT WAS UNNECESSARY, WHICH COMES TO \$5,052,880 EPA SHARE.			Summary: THE GRANTEE CLAIMED \$942,874 OF INELIGIBLE COSTS THAT WERE NOT PROPERLY PROCURED RELATING TO LEGAL SERVICES AND ENGINEERING COSTS INCURRED AFTER CONSTRUCTION COMPLETION DATE. THE GRANTEE ALSO CLAIMED \$3,742,844 OF UNSUPPORTED CONSTRUCTION AND ENGINEERING COSTS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: JUSTIFICATION FOR THE EXPANSION OF THE TREATMENT PLANT IS DEPENDENT UPON THE OUTCOME OF THE CORRECTIVE ACTION PLAN FOR THE RUSKIN/WIMAUMA PROJECT. THE REGION AND OIG CONCUR THAT A FINAL DETERMINATION IS PREMATURE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: COMPLEX LEGAL ISSUES HAD TO BE RESOLVED BEFORE THE AUDIT COULD BE RESOLVED. THE PRELIMINARY DETERMINATION WAS ISSUED ON JANUARY 29, 1993.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE EXPECTED ISSUANCE OF THE FINAL DETERMINATION LETTER IS APRIL 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [2] (OIG agrees with the above status.)			IG FOLLOWUP STATUS AS OF 3/31/93 [3]		
<u>REGION 5, REGIONAL ADMINISTRATOR</u>					
P2CWN9-05-0336-0300076	WELLSVILLE	OH 8/ 6/90	P2CWP6-05-0298-2400004	W LAKE SUPERIOR (DULUTH)	MN 12/12/91
Summary: WE QUESTIONED AS INELIGIBLE OVER \$1.9 MILLION BECAUSE OF THE GRANTEE'S FAILURE TO REHABILITATE ITS SEWERS.			Summary: THE WESTERN LAKE SUPERIOR SANITARY DISTRICT CLAIMED \$8,595,588 OF INELIGIBLE CONSTRUCTION, ENGINEERING AND ADMINISTRATIVE COSTS AND \$166,834 OF UNSUPPORTED COSTS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: GRANTEE RESOLVED ALL COMPLIANCE FINDINGS ON DECEMBER 23, 1992, AS INSTRUCTED UNDER 1988 CONSENT DECREE. OIG AGREED TO REGION'S FINAL DETERMINATION LETTER DATED MARCH 26, 1993, BUT WILL NOT CLOSE AUDIT UNTIL GRANTEE COMPLIES WITH SPECIAL CONDITIONS OF GRANT AWARD.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE DIVISIONAL INSPECTOR GENERAL FORWARDED THIS AUDIT TO THE OFFICE OF ASSISTANT INSPECTOR GENERAL FOR AUDITS ON JULY 24, 1992. THE REPORT QUESTIONED OVER \$8 MILLION RELATED TO THE SOLID WASTE PROCESSING PORTION OF THE PLANT. OF THIS, \$7,563,075 OF CONSTRUCTION COSTS PLUS RELATED ARCHITECTURE AND ENGINEERING EXPENSES ARE AT ISSUE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION OF THIS AUDIT IS EXPECTED BY SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [3]			IG FOLLOWUP STATUS AS OF 3/31/93 [6]		

Assignment Control Number	Title	Final Report Issued
P2BWP1-05-0357-2400064	MILWAUKEE MSD	WI 8/18/92
<p>Summary: MILWAUKEE METROPOLITAN SEWERAGE DISTRICT CLAIMED \$3,060,908 OF INELIGIBLE COSTS AND \$2,720,064 OF UNSUPPORTED COSTS.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: DUE TO THE LARGE NUMBER OF GRANTS BEING AUDITED, THE GRANTEE WAS UNABLE TO SUBMIT A COMPLETE RESPONSE UNTIL JANUARY, 1993.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION IS EXPECTED TO BE COMPLETED BY JUNE 30, 1993.</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [3]</p>		
P2CWP8-05-0264-2400077	GARY SD	IN 9/28/92
<p>Summary: THE ENTIRE GRANT \$14,860,519 IS QUESTIONED BECAUSE THE WASTEWATER TREATMENT PLANT DOES NOT MEET ITS NPDES LIMITS. IN ADDITION, \$7,593,204 OF THE GRANT IS QUESTIONED BECAUSE THE TERTIARY FILTER FACILITY HAS NOT BEEN MAINTAINED AND IS INOPERABLE.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: OVER \$7 MILLION OF FILTER COSTS AND ASSOCIATED ENGINEERING FEES WERE QUESTIONED BECAUSE THE FILTERS ARE INOPERABLE. CONSEQUENTLY, THE GRANTEE IS IN VIOLATION OF ITS NPDES PERMIT. A CONSENT DECREE GIVES GARY UNTIL 1994 TO COMPLY.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [3]</p>		
N3HVJ2-05-0225-2501051	MICHIGAN DNR FY 88/89	MI 9/4/92
<p>Summary: AUDITOR QUESTIONED \$618,689 DUE TO PRE-BILLING OF WORK NOT PAID FOR; NOT MAINTAINING REQUIRED PERCENTAGE AT LEVEL OF FUNDING REQUIRED, AND NOT COMPLYING WITH SPECIAL CONDITIONS ON COOPERATIVE AGREEMENTS.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: COMPLIANCE ISSUES NEEDED TO BE ADDRESSED BEFORE DETERMINING THE ELIGIBILITY OF THE QUESTIONED COSTS. THE PRELIMINARY DETERMINATION WAS ISSUED ON MARCH 2, 1993.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION IS EXPECTED TO BE ISSUED BY APRIL 30, 1993.</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [3]</p>		
P2CWN4-05-0183-5100159	EUCLID	OH 7/12/85
<p>Summary: WE QUESTIONED THE ENTIRE GRANT AWARD OF ALMOST \$14.3 MILLION. THE GRANTEE FAILED TO MEET GRANT CONDITION NO. 3 AND OPERATE THE PLANT SUFFICIENTLY TO MEET ITS NPDES PERMIT.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: RESOLUTION OF QUESTIONED COSTS DEPENDS UPON GRANTEE'S SATISFACTORY COMPLETION OF ACTIONS IMPOSED BY CONSENT DECREE. CONSENT DECREE ALLOWS GRANTEE UNTIL 1996 TO COMPLETE CORRECTIVE ACTIONS.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [3]</p>		
P2CWN4-05-0357-6100389	DETROIT WS	MI 8/25/86
<p>Summary: THE CITY OF DETROIT, MI CLAIMED OVER \$169,000 OF UNREASONABLE ENGINEERING COSTS.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL (AIGA) FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [2]</p>		

Assignment Control Number	Title	Final Report Issued
P2CWN4-05-0264-6100390	DETROIT WSD	MI 8/25/91
<p>Summary: WE QUESTIONED INELIGIBLE FORCE ACCOUNT COSTS OF \$20,872 INCURRED PRIOR TO THE GRANT AWARD. IN ADDITION, UNSUPPORTED FORCE ACCOUNT COSTS OF \$36,370 INCURRED AFTER THE APPROVED CONSTRUCTION COMPLETION DATE WERE QUESTIONED.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY ARB.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [2]</p>		
P2CWN4-05-0263-6100391	DETROIT WSD	MI 8/25/91
<p>Summary: THE GRANTEE CLAIMED UNREASONABLE FORCE ACCOUNT CC OF \$286,000. THE GRANTEE ALSO CLAIMED INELIGIBLE COSTS OF \$15,000.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY ARB.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [2]</p>		
P2CWN4-05-0280-6100574	DETROIT WSD	MI 9/30/91
<p>Summary: WE QUESTIONED INELIGIBLE COST OF \$293,000 MOSTLY CHANGE ORDERS. WE ALSO QUESTIONED UNNECESSARY COST OF \$399,100 FOR FORCE ACCOUNT AND GRANTEE DELAYS. CHANGE ORDER COSTS OF \$148,00 WERE UNSUPPORTED.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY ARB.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [2]</p>		
P2CWN4-05-0265-6100575	DETROIT WSD	MI 9/30/91
<p>Summary: THE GRANTEE CLAIMED INELIGIBLE AND UNSUPPORTED CONSTRUCTION COSTS OF \$559,000. THE GRANTEE ALSO CLAIMED UNREASONABLE ENGINEERING COSTS OF \$374,000.</p> <p>- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY ARB.</p> <p>= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:</p> <p>IG FOLLOWUP STATUS AS OF 3/31/93 [2]</p>		

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P2CWN5-05-0242-7000034	DETROIT WSD	MI 10/ 6/86	E2BWL5-05-0136-7000980	SAUGET	IL 3/31/87
Summary: WE QUESTIONED INELIGIBLE CONSTRUCTION AND ENGINEERING COSTS OF \$20,006. IN ADDITION, WE QUESTIONED UNSUPPORTED ENGINEERING COSTS OF \$40,495 INCURRED AFTER THE APPROVED CONSTRUCTION COMPLETION DATE.			Summary: SAUGET, IL WAS AWARDED FEDERAL FUNDS IN EXCESS OF \$7 MILLION FOR INELIGIBLE AND UNNECESSARY PROJECT COSTS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS SEEKING GUIDANCE FROM REGIONAL COUNSEL AND THE WATER DIVISION REGARDING COMPLEX TECHNICAL AND LEGAL ISSUES. REGION AND OIG HAVE DISAGREEMENTS THAT WILL BE ELEVATED TO THE AUDIT RESOLUTION BOARD WHEN THE PROPOSED FINAL DETERMINATION IS SENT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE EXPECTED PRELIMINARY FINAL DETERMINATION IS APRIL 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
P2CWN5-05-0246-7000044	DETROIT WSD	MI 10/ 7/86	P2GWN5-05-0132-8000464	DETROIT WSD	MI 1/20/88
Summary: THE GRANTEE CLAIMED UNREASONABLE FORCE ACCOUNT COSTS OF \$336,000.			Summary: DETROIT CLAIMED INELIGIBLE COSTS OF ALMOST \$2.6 MILLION RESULTING FROM ITS FAILURE TO HONOR A CONTRACT. WE ALSO QUESTIONED UNSUPPORTED COSTS OF ALMOST \$2.1 MILLION.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
P2GWN5-05-0275-7000045	DETROIT WSD	MI 10/ 7/86	P2CWN7-05-0237-8100724	DETROIT WSD	MI 8/29/88
Summary: WE QUESTIONED \$80,000 OF INELIGIBLE ENGINEERING AND CONSTRUCTION COSTS. ENGINEERING COSTS OF \$112,000 INCURRED AFTER THE CONSTRUCTION COMPLETION DATE WERE NOT SUPPORTED.			Summary: DETROIT, MI CLAIMED OVER \$274,000 OF INELIGIBLE CONSTRUCTION COSTS. WE ALSO QUESTIONED UNSUPPORTED ENGINEERING AND FORCE ACCOUNT COSTS OF \$662,000.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
P2CWN5-05-0247-7000049	DETROIT WSD	MI 10/ 8/86	P2GWN5-05-0169-8100774	DETROIT WSD	MI 9/ 1/88
Summary: WE QUESTIONED UNREASONABLE TECHNICAL SERVICES AND CONSTRUCTION COSTS OF \$559,000.			Summary: WE QUESTIONED INELIGIBLE CONSTRUCTION AND ENGINEERING COSTS OF \$96,520. IN ADDITION, WE QUESTIONED THAT ENGINEERING COSTS OF \$992,430 INCURRED AFTER THE APPROVED CONSTRUCTION COMPLETION DATE WERE NOT SUPPORTED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
P2CWN5-05-0276-7000050	DETROIT WSD	MI 10/ 8/86			
Summary: WE QUESTIONED \$59,000 OF INELIGIBLE ENGINEERING COSTS. ENGINEERING COSTS OF \$433,600 INCURRED AFTER THE APPROVED CONSTRUCTION COMPLETION DATE WERE NOT SUPPORTED.					
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG WILL SUBMIT A PACKAGE OUTLINING THE AUDIT ISSUES TO THE ASSISTANT INSPECTOR GENERAL FOR AUDITS BY MAY 31, 1993. THE AIGA WILL PRESENT THESE ISSUES TO THE AUDIT RESOLUTION BOARD. RESOLUTION DATE IS DEPENDENT UPON REVIEW OF AUDIT BY THE ARB.					
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:					
IG FOLLOWUP STATUS AS OF 3/31/93 [2]					

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
E2AWT0-05-0223-0400020	SELLERSBURG EWS	IN 6/14/90	<u>REGION 8, REGIONAL ADMINISTRATOR</u>		
Summary: REGION 5 AWARDED A \$5.5 MILLION STEP 2+3 GRANT TO SELLERSBURG, IN FOR A PROJECT WHICH DID NOT MEET THE ELIGIBILITY REQUIREMENTS FOR A STEP 2+3 GRANT.			P2CW*8-08-0052-2100634 HAYDEN, TOWN OF CO 9/22/92		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION AND DIVISION OIG CANNOT REACH AGREEMENT ON A MANAGEMENT DECISION. THE OIG HAS BEEN FORWARDED TO THE AIGA FOR FURTHER ANALYSIS AND RESOLUTION. THE MAIN ISSUE IS WHETHER OR NOT THE GRANT AWARD IS INVALID.			Summary: GRANTEE CLAIMED A/E, CONSTRUCTION, AND EQUIPMENT COSTS OF \$16,335.00 WHICH WERE UNSUPPORTED AND DESIGN, ENGINEERING, AND CONSTRUCTION COSTS OF \$1,382,470 WHICH WERE UNNECESSARY/UNREASONABLE BECAUSE OF UNDER UTILIZATION OF CAPACITY.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: ON DECEMBER 21, 1992, THE REGION FORWARDED A DRAFT FINAL DETERMINATION LETTER TO THE OIG. THE OIG CODED THIS AUDIT AS INCOMPLETE, AND THE REGION REQUESTED REASONS FOR THIS ACTION ON MARCH 9, 1993. THE REGION PLANS TO RESPOND QUICKLY TO THE OIG'S CONCERNS. NO CORRESPONDENCE HAS BEEN RECEIVED FROM THE OIG AS OF APRIL 20, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [6]			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE EXPECTED DATE FOR THE FINAL DETERMINATION LETTER IS JUNE 30, 1993.		
E2AWT0-05-0224-0400045	W TERRE HAUTE EWS	IN 9/28/90	IG FOLLOWUP STATUS AS OF 3/31/93 [2] (Discussions were held with the Regional representative on March 9, 1993. The report is expected to be resolved during the semiannual period ending September 30, 1993.)		
Summary: REGION 5 AWARDED A STEP 2+3 GRANT OF \$5,275,325 TO WEST TERRE HAUTE, IN FOR A PROJECT WHICH DID NOT MEET THE ELIGIBILITY REQUIREMENTS FOR A STEP 2+3 GRANT.			<u>REGION 9, REGIONAL ADMINISTRATOR</u>		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION AND DIVISION OIG CANNOT REACH AGREEMENT ON A MANAGEMENT DECISION. THE OIG HAS BEEN FORWARDED TO THE AIGA FOR FURTHER ANALYSIS AND RESOLUTION.			S5BG*8-09-0202-0300037 CA DEPT OF HEALTH CA 3/30/90		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.			Summary: COSTS OF \$2,419,415 QUESTIONED AS INELIGIBLE AND \$1,639,629 AS UNREASONABLE. INELIGIBLES RELATED TO FORCE ACCOUNT AND CONTRACT COSTS. UNREASONABLE RELATED TO CONTRACT COSTS. GRANTEE'S FINANCIAL MANAGEMENT SYSTEM DETERMINED INADEQUATE. MOST INELIGIBLE COST RESULT OF THIS.		
IG FOLLOWUP STATUS AS OF 3/31/93 [6]			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION HAS CONDUCTED EXTENSIVE WORK ON RESOLVING THE COST/PRICE ANALYSIS AND THE LAB DATA INTEGRITY COST ISSUES ASSOCIATED WITH THIS AUDIT. RESOLUTION WAS DELAYED BY A LENGTHY NEGOTIATION PERIOD WITH THE OIG ON HOW ISSUES NEEDED TO ADDRESSED.		
E2AWT1-05-0134-14000070	S HENRY RSD EWS	IN 2/25/91	= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: APRIL 30, 1993.		
Summary: REGION 5 AWARDED A STEP 2+3 GRANT OF \$4,461,050 TO SOUTH HENRY REGIONAL WASTE DISTRICT, IN FOR A PROJECT WHICH DID NOT MEET THE ELIGIBILITY REQUIREMENTS FOR A STEP 2+3 GRANT.			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION AND DIVISION OIG CANNOT REACH AGREEMENT ON A MANAGEMENT DECISION. THE OIG HAS BEEN FORWARDED TO THE AIGA FOR FURTHER ANALYSIS AND RESOLUTION. THE MAIN ISSUE IS WHETHER OR NOT THE GRANT AWARD IS INVALID.			P2CWM1-09-0157-2200040 SUTTER CREEK, CITY OF CA 9/30/92		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.			Summary: COST QUESTIONED OF \$12,916 INCLUDES \$5,566 OF ENGINEERING COST IN EXCESS OF APPROVED AMOUNT, AND \$6,850 OF UNDOCUMENTED ADMINISTRATIVE AND \$500 PERMIT FEES, UNREASONABLE COSTS OF \$343,467 RELATED TO FIX UP FACILITIES CONSTRUCTED UNDER PRIOR GRANT.		
IG FOLLOWUP STATUS AS OF 3/31/93 [6]			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE STATE HAS DRAFTED A FINAL DETERMINATION LETTER WHICH IS IN ITS CONCURRENCE CYCLE. THE REGION EXPECTS THE DRAFT FINAL DETERMINATION LETTER SOON AND WILL REQUEST LOCAL OIG REVIEW.		
E2AWT1-05-0116-1400048	ENGLISH EWS	IN 9/25/91	= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS DECEMBER 31, 1993.		
Summary: THE GRANTEE HAS BEGUN A SIGNIFICANT REDEVELOPMENT PROJECT WHICH RAISES QUESTIONS ABOUT THE CONCLUSIONS OF THE FACILITIES PLANNING PROCESS. AS A RESULT THE GRANT AWARD OF \$2,676,600 WAS PREMATURE AND THE PRELIMINARY PLANNING NEEDS TO BE REEVALUATED.			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG DID NOT ACCEPT MANAGEMENT'S FINAL DETERMINATION AND IS ELEVATING THE AUDIT TO THE HEADQUARTERS OIG FOR FURTHER ATTENTION AND ANALYSIS. THE MAIN ISSUE IS WHETHER OR NOT THE GRANT AWARD IS INVALID.			S2CWM0-09-0262-2300089 SAN FRANCISCO, CITY & CO CA 9/30/92		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: RESOLUTION IS EXPECTED BY SEPTEMBER 30, 1993.			Summary: INELIGIBLE COST INCLUDE \$50,015 OF UNALLOWABLE A/E COSTS AND \$271,092 FOR COSTS ALLOCABLE TO OTHER FEDERAL FACILITIES RELATED TO UNSUPPORTED CONSTRUCTION R/E FORCE ACCOUNT COSTS.		
IG FOLLOWUP STATUS AS OF 3/31/93 [6]			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE DRAFT FINAL DETERMINATION LETTER HAS BEEN DELAYED BY THE STATE'S CONCURRENCE CYCLE.		
			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION IS SEPTEMBER 30, 1993.		
			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P2BWL0-09-0175-1100436	CLARK COUNTY SD	NV 9/30/91	S2CWN9-09-0032-1300118	MONTEREY REG WATER POLL COM CA	9/30/91
Summary: THE CLARK COUNTY SANITATION DISTRICT, NEVADA (THE GRANTEE) CLAIMED INELIGIBLE COSTS OF \$6,851,921, ABOUT \$26 MILLION OF UNNECESSARY/UNREASONABLE OR UNSUPPORTED COSTS FOR A WASTEWATER TREATMENT PLANT USED AT ONLY ABOUT HALF OF ITS CAPACITY.			Summary: THE STATE CLAIMED \$7,491,007 OF INELIGIBLE CONSTRUCTION, ENGINEERING, ADMINISTRATIVE, AND OTHER COSTS. ADDITIONAL \$51,118,958 OF UNREASONABLE PROJECT COSTS WERE QUESTIONED.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS WORKING WITH THE STATE TO RESOLVE THIS AUDIT AND FACILITATE THE RECOVERY OF ANY OUTSTANDING RESOURCES. THE REGION REQUIRED ADDITIONAL TIME TO RESOLVE THIS INTERIM AUDIT TO IDENTIFY AND ADDRESS NOT ONLY THE ISSUES HIGHLIGHTED BY THIS OIG REPORT BUT ALSO OTHER POTENTIAL ISSUES ASSOCIATED WITH THIS GRANT.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE STATE HAS COMPLETED WORK ON THE MANY TECHNICAL ISSUES AND DRAFTED A FINAL DETERMINATION LETTER WHICH IS CURRENTLY UNDER STATE MANAGEMENT REVIEW. IT WILL SOON BE REVIEWED BY THE OIG.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: REVISED TARGET DATE FOR RESOLUTION IS SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
S2CWN8-09-0157-1300112	LOS ANGELES, CITY OF	CA 9/25/91	S2CWN8-09-0156-1300119	LOS ANGELES, CITY OF	CA 9/30/91
Summary: INELIGIBLE COSTS OF \$723,627 INCLUDED: \$650,255 OF UNALLOWABLE FORCE ACCOUNT COSTS AND \$73,372 FOR UNALLOWABLE ENGINEERING COSTS. UNREASONABLE COSTS INCLUDE \$879,630 OF UNDOCUMENTED FORCE ACCOUNT AND \$1,099,261. ARCHITECT/ENGINEERING COSTS INCURRED UNDER PROHIBITED CONTRACT METHOD.			Summary: INELIGIBLE COSTS OF \$2,483,872 INCLUDED \$2,039,554 OF CONSTRUCTION AND FORCE ACCOUNT COST OUTSIDE SCOPE OF APPROVED PROJECT; \$444,318 OF FORCE ACCOUNT ALLOCABLE TO INELIGIBLE CONSTRUCTION; UNREASONABLE COSTS OF \$68,150,598 RELATED TO EXCESSIVE LANDSCAPING, FORCE ACCOUNT AND UNUSED FACILITIES.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS IS A DELEGATED STATE. THE STATE HAS BEEN RESOLVING SEVERAL OF THE TECHNICAL ISSUES WITH THE GRANTEE. THE GRANTEE HAS PROVIDED ADDITIONAL SUPPORT DOCUMENTATION. A FINAL DETERMINATION LETTER HAS BEEN DRAFTED BY THE STATE AND WILL BE SOON REVIEWED BY THE OIG. THIS AUDIT IS RELATED TO SEVERAL OTHERS OF THE GRANTEE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS IS A DELEGATED STATE. THE STATE HAS BEEN RESOLVING SEVERAL OF THE TECHNICAL ISSUES WITH THE GRANTEE. THE GRANTEE HAS PROVIDED ADDITIONAL SUPPORT DOCUMENTATION. A FINAL DETERMINATION LETTER HAS BEEN DRAFTED BY THE STATE AND WILL BE SOON REVIEWED BY THE OIG. THIS AUDIT IS RELATED TO SEVERAL OTHERS OF THE GRANTEE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
S2CWN9-09-0039-1300117	LOS ANGELES, CITY OF	CA 9/30/91	S2CWN9-09-0171-1300120	TRACY, CITY OF	CA 9/30/91
Summary: INELIGIBLE COSTS INCLUDED \$4,004,695 FOR COST INCURRED PRIOR TO APPROVAL \$3,659,407 IN EXCESS OF APPROVAL ADDITIONAL AE QUESTIONED \$3,999,353 RELATED TO REPLACEMENT OF BAS ENGINES WITH ELECTRIC MOTORS AND \$5,275,186 FOR INADEQUATELY DOCUMENTED FORCE ACCOUNT COSTS.			Summary: INELIGIBLE COSTS INCLUDED: \$11,438 FOR ARCHITECT/ENGINEERING COSTS; \$655,329 OF INTEREST EARNED; \$2,916,214 FOR LITIGATION SETTLEMENT; UNREASONABLE COST OF \$5,516,623 WERE RELATED TO "FIXING UP" OF FAILED FACILITIES.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS IS A DELEGATED STATE. THE STATE HAS BEEN RESOLVING SEVERAL OF THE TECHNICAL ISSUES WITH THE GRANTEE. THE GRANTEE HAS PROVIDED ADDITIONAL SUPPORT DOCUMENTATION. A FINAL DETERMINATION LETTER HAS BEEN DRAFTED BY THE STATE AND WILL BE SOON REVIEWED BY THE OIG. THIS AUDIT IS RELATED TO SEVERAL OTHERS OF THE GRANTEE.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE CLAIMS POLICY HAS BEEN ISSUED. THE STATE SUBMITTED THE DRAFT FINAL DETERMINATION LETTER TO THE OIG FOR ITS REVIEW.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REVISED TARGET DATE FOR THE FINAL DETERMINATION LETTER APRIL 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
E2AMP9-09-0189-1400006	EARLY WARNING - MONTEREY	CA 2/11/91	Summary: REGION 9 AWARDED \$8.1 MILLION GRANT AMENDMENT WHICH DID NOT MEET THE REQUIREMENTS OF THE CLEAN WATER ACT OR THE EPA REGULATIONS. IN ADDITION, THE U.S. ARMY OVERPAID \$6.2 MILLION FOR ITS SHARE OF THE CONSTRUCTION PROJECT.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: FINAL DETERMINATION LETTER IS AT OIG FOR REVIEW; POSTPONED TO OBTAIN LEGAL OPINION REQUESTED BY OIG. THIS AUDIT IS LINKED TO EARLY WARNING-MARINA (#9400043).			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: FINAL DETERMINATION LETTER IS AT OIG FOR REVIEW; POSTPONED TO OBTAIN LEGAL OPINION REQUESTED BY OIG. THIS AUDIT IS LINKED TO EARLY WARNING-MARINA (#9400043).		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			IG FOLLOWUP STATUS AS OF 3/31/93 [1] (OIG agrees with the above status The OIG had not received a draft or final determination letter as of March 31, 1993. The need for a legal opinion was recommended in the OIG's report in 1991. The Region has verbally suggested alternative action that they believe will satisfy the intent of our recommendation. However, they have not yet convinced the grantee to take their alternative action. If the alternative action is not taken, a legal opinion may still be required.)		

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
E1KAG1-09-6094-1400049	FOLLOW UP REVIEW REG. IX AI CA	9/25/91	S2CWN1-09-0228-2300044	LOS ANGELES, CITY OF	CA 3/13/9
Summary: REGION 9 TOOK INADEQUATE ACTION TO MONITOR AIR GRANT ELIGIBILITY. AS A RESULT, \$2.1 MILLION IN AIR GRANTS FROM FY 1983 TO 1985 REMAIN QUESTIONABLE. AN ADDITIONAL \$1.9 MILLION IN QUESTIONABLE GRANTS WAS AWARDED FROM FY 1986 TO 1990.			Summary: INELIGIBLE COSTS INCLUDED \$1,400,564 FOR UNUSED EQUIPMENT ITEMS \$202,058; FOR UNALLOWABLE ARCHITECT/ENGINEERIN FEES; AND \$572,354 FOR UNALLOWABLE FORCE ACCOUNT, UNREASONABLE COSTS OF \$1,010,586 FOR EXCESSIVE ARCHITECT/ENGINEERING AND FORCE ACCOUNT, ADDITIONAL \$11,188,321 PLANT NOT OPERATING IN ACCORDANCE WITH GRANT CONCEPTS.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A UNIQUE RESPONSE TO THIS INTERNAL AUDIT WAS REQUIRED BECAUSE CORRECTIVE ACTIONS REQUIRED FOLLOWUP WITH MULTIPLE EXTERNAL GRANTEEES. A DEVIATION REQUEST FOR WASHOE IS AT EPA-HQ (OGC). WE HAVE REQUESTED IMMEDIATE ATTENTION TO ASSIST THE REGION WITH AUDIT RESOLUTION.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEE MADE: THIS IS A DELEGATED STATE. THE STATE HAS BEEN RESOLVIN SEVERAL OF THE TECHNICAL ISSUES WITH THE GRANTEE. THE GRANTEE HAS PROVIDED ADDITIONAL SUPPORT DOCUMENTATION. A FINAL		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: DETERMINATION LETTER HAS BEEN DRAFTED BY THE STATE AND WILL BE SOON REVIEWED BY THE OIG. THIS AUDIT IS RELATED TO SEVERAL OTHERS OF THE GRANTEE.		
IG FOLLOWUP STATUS AS OF 3/31/93 [6]			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30 1993.		
P2CWN0-09-0294-2200036	EL MIRAGE, CITY OF	AZ 9/29/92	IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
Summary: UNSUPPORTED ADMINISTRATIVE COSTS OF \$110,285 QUESTIONED. INELIGIBLE COSTS INCLUDE \$9,681 FOR ADMINISTRATION AND ARCHITECT/ENGINEERING ALLOCABLE TO INELIGIBLE CONSTRUCTION AND \$98,019 FOR CONSTRUCTION IN EXCESS OF APPROVED \$6,280,011 OF UNREASONABLE COSTS RELATED TO UNDER UTILIZED FACILITIES.			E1SG*7-09-0219-2300063 REGION 9 MGMT OF STNGFELLOW CA 7/30/9		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE STATE HAS REQUESTED THAT THE GRANTEE PROVIDE ADDITIONAL SUPPORTING DOCUMENTATION. ONCE RECEIVED AND REVIEWED, A FINAL DETERMINATION LETTER WILL BE PREPARED AND FORWARDED TO THE REGION AND LOCAL OIG.			Summary: REGION 9 HAS NOT EFFECTIVELY MANAGED THE STRINGFELLOW SUPERFUND COOPERATIVE AGREEMENT. PROBLEMS WITH ACCURACY OF LABORATORY ANALYSES; DELAY IN COMPLETION OF RI/FS; DELAY IN COMPLETION AND STARTUP OF INTERIM PRETREATMENT FACILITY; AND REVIEW OF STATES ROLE.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEE MADE: ALL CONCERNS OF THE OIG HAVE BEEN ADDRESSED VIA ADDITIONAL TECHNICAL AND LEGAL SETTLEMENT EFFORTS. A FINAL DETERMINATION LETTER WILL SOON BE PREPARED TO CAPTURE THESE RESOLUTIONS.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1]			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TH TARGET DATE FOR THE FINAL DETERMINATION LETTER IS MAY 30, 1993		
P2CWN0-09-0031-2300017	PINETOP LAKESIDE SD	AZ 12/ 4/91	IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
Summary: UNNECESSARY COSTS OF \$4,105,313 QUESTIONED RELATED TO UNUSED AND UNDERUTILIZED FACILITIES CONSTRUCTED UNDER THE PROJECT.			S2CWN0-09-0124-2300076 SELMA-KINGSBURG-FOWLER CA 9/ 8/9		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE OIG REQUESTED ADDITIONAL INFORMATION IN OCTOBER 1992 TO SUPPORT THE REGION'S POSITION ON ONE AUDIT ISSUE.			Summary: INELIGIBLE COST OF \$1,012,364 INCLUDED \$4,762 OF UNALLOWABLE ADMINISTRATIVE COST; \$75,115 FOR ARCHITECT/ENGINEERING COSTS; \$409,487 OF INELIGIBLE CONSTRUCTI AND \$525,000 OF SETTLEMENT REVENUE. UNREASONABLE COSTS OF \$4,053,969 RELATED TO UTILIZED FACILITIES.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: AFTER CONSIDERABLE EFFORT TO COLLECT THE DOCUMENTATION, THE REGION REACHED AGREEMENT WITH THE OIG AND ISSUED THE FINAL DETERMINATION LETTER TO THE GRANTEE ON MARCH 25, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEE MADE: THE STATE HAS DRAFTED A FINAL DETERMINATION LETTER WHIC HAS BEEN DELAYED BY THE STATE'S CONCURRENCE CYCLE. IT SHOULD FORWARDED TO THE REGION SHORTLY.		
IG FOLLOWUP STATUS AS OF 3/31/93 [5] (This audit was closed on April 5, 1993.)			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TH REVISED FINAL DETERMINATION DATE IS SEPTEMBER 30, 1993.		
S5BGW0-09-0303-2300043	L.A. DEPT WATER & POWER	CA 3/13/92	IG FOLLOWUP STATUS AS OF 3/31/93 [1]		
Summary: INELIGIBLE COSTS OF \$2,321,195 INCURRED; \$4,810 OF UNALLOWABLE TRAINING AND STORAGE COST; \$287,450 FOR RETENTIONS NOT PAID; AND \$1,991,131 FOR UNALLOWABLE FORCE ACCOUNT UNREASONABLE COSTS OF \$4,354,690 FOR ARCHITECT/ENGINEERING SUBAGREEMENTS NOT CONTAINING EPA PRIVITY CLAUSE.			E2CWN1-09-0092-2300082 RUSSIAN RIVER CSD CA 9/25/9		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: TO FACILITATE AGREEMENT WITH THE OIG, THE REGION HOSTED MEETINGS WITH ALL PARTIES ON APRIL 15, 1993 TO DISCUSS AND RESOLVE ISSUES.			Summary: COSTS OF \$8,344,066 HAVE BEEN QUESTIONED AS INELIGIBLE, INCLUDING INELIGIBLE CONSTRUCTION ENGINEERING AND FORCE ACCOUNT COSTS AN ADDITIONAL \$18,297,400 HAS BEEN QUESTION AS UNNECESSARY BECAUSE THE PLANT WAS NOT FULLY UTILIZED.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: A FINAL DETERMINATION LETTER IS EXPECTED BY MAY 30, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEE MADE: THE STATE HAS BEEN DELAYED BY EXTENDED WORK ON TECHNICA ISSUES (E.G., SETTLEMENT COSTS). IT WILL SOON DRAFT FINAL DETERMINATION LETTER. ONCE DRAFTED, OIG REVIEW WILL BE REQUESTED.		
IG FOLLOWUP STATUS AS OF 3/31/93 [2]			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: TH TARGET DATE FOR THE FINAL DETERMINATION LETTER IS DECEMBER 12, 1993.		
			IG FOLLOWUP STATUS AS OF 3/31/93 [1]		

Assignment Control Number	Title	Final Report Issued
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P2CWN1-09-0044-2300086 NACO SAN DIST. AZ 9/29/92
Summary: INELIGIBLE COSTS OF \$8,487 INCLUDES UNALLOWABLE ADMINISTRATIVE AND ARCHITECT/ENGINEERING COSTS; \$43,060 RELATED TO COSTS NOT SUPPORTED BY ADEQUATE SOURCE DOCUMENTATION; AND \$1,390,917 RELATED TO UNDERUTILIZED FACILITIES.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: AZ DEQ IS AWAITING ADDITIONAL SUPPORT DOCUMENTS FROM THE GRANTEE. DELAY EXACERBATED BY EXTENSIVE CHANGE IN RECIPIENT'S ADMINISTRATIVE PERSONNEL.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

E2AMP9-09-0065-9400025 HOMELAND EARLY WARNING CA 3/31/89
Summary: SPECIAL REVIEW OF CONSTRUCTION GRANT OF WASTEWATER TREATMENT PLANT FOUND \$3,737,139 IN FEDERAL SHARE COSTS QUESTIONED. AN EARLY WARNING LETTER ADVISED THAT COSTS FOR THE COLLECTION SYSTEM PORTION OF THE PROJECT DID NOT QUALIFY FOR FUNDING BECAUSE OF THE "2/3 RULE".

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: RESOLUTION OF THIS AUDIT HAS BEEN REFERRED TO THE AUDIT RESOLUTION GROUP. THE REGION IS WORKING WITH THE AGENCY'S AUDIT RESOLUTION GROUP TO RESOLVE THE ISSUE OR PREPARE THE PACKAGE FOR AN AUDIT RESOLUTION BOARD DECISION. THE OFFICE OF WATER ISSUED POLICY CLARIFICATION ON THE 2/3 RULE. THE OIG ASKED OFFICE OF GENERAL COUNSEL FOR FURTHER POLICY CLARIFICATION.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REVISED FINAL DETERMINATION LETTER TARGET DATE IS DECEMBER 31, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [6]

E2AMP9-09-0230-9400043 EARLY WARNING-MARINA CWD CA 9/26/89
Summary: SPECIAL REVIEW OF GRANT TO BUY CAPACITY RIGHTS FROM REGIONAL WASTEWATER TREATMENT PLANT RESULTED IN AN EARLY WARNING LETTER TO EPA MANAGEMENT THAT THE AWARD VIOLATED 40 CFR 35.2250 AND THAT TOTAL COSTS QUESTIONED OF \$1,694,000 (F.S. \$931,700) COULD CAUSE "WINDFALL" PROFITS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THIS AUDIT IS LINKED TO THE MONTEREY EARLY WARNING AUDIT (#140006). BUY-IN COSTS FOR THE MARINA WILL BE DETERMINED AFTER AN OIG AUDIT OF MONTEREY EXPANSION COSTS AND THE RESOLUTION OF MONTEREY'S EARLY WARNING AUDIT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE TARGET DATE FOR THE FINAL DETERMINATION LETTER IS SEPTEMBER 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [5] (OIG agrees with the above status)

REGION 10, REGIONAL ADMINISTRATOR

P5CHN9-10-0151-0300095 OREGON DEQ OR 9/27/90
***Summary:**

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION REQUIRED ADDITIONAL TIME TO RESOLVE A LEAVE ISSUE SINCE IT INVOLVED SEVERAL STATES. THE REGION ISSUED THE FINAL DETERMINATION LETTER TO THE GRANTEE ON MARCH 30, 1993, AND A FAX COPY WAS SENT TO THE OIG.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:

IG FOLLOWUP STATUS AS OF 3/31/93 [4] (This audit was closed on April 5, 1993.)

Assignment Control Number	Title	Final Report Issued
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P2CWL9-10-0002-2100669 PIERCE COUNTY UTILITIES DEP WA 9/30/92
Summary: THE GRANTEE CLAIMED TOTAL QUESTIONABLE COSTS OF \$4,496,181 FOR REIMBURSEMENT UNDER EPA'S CONSTRUCTION GRANTS PROGRAM. COST CLAIMED OF \$2,179,647 WERE FOUND TO BE INELIGIBLE AND CLAIMS FOR \$2,316,534 WERE UNNECESSARY AND UNREASONABLE.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION OBTAINED ADDITIONAL DOCUMENTATION FOR REVIEW OF GRANT ELIGIBILITY AND LACK OF DOCUMENTATION ISSUES IN AUDIT REPORT. THE REGION MUST REVIEW 16 GRANTS AND 40 LARGE BOXES OF DOCUMENTATION WHICH OBTAINED FROM VARIOUS SOURCES TO COMPLETE THIS RESOLUTION.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REGION WILL ISSUE A DRAFT FINAL DETERMINATION LETTER TO OIG BY JULY 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2CWN1-10-0042-2300088 NEWBERG, CITY OF OR 9/30/92
Summary: INELIGIBLE COSTS OF \$8,998 RELATED COSTS IN EXCESS OF APPROVAL; \$151,758 FOR COSTS NOT SUPPORTED BY ADEQUATE SOURCE DOCUMENTATION; AND \$15,480,301 UNREASONABLE RELATED TO UNUSED FACILITIES AND EXPIRED NPDES PERMIT.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION HAS ENCOUNTERED A DELAY IN GETTING ADDITIONAL INFORMATION FROM THE AUDITEE, STATE, AND CORPS OF ENGINEERS FOR REVIEW AND RESOLUTION OF "UNSUPPORTED COSTS" AND "COSTS CLAIMED IN EXCESS OF APPROVED AMOUNTS" ISSUES CONTAINED IN THE AUDIT REPORT.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REGION WILL ISSUE THE DRAFT FINAL DETERMINATION LETTER TO THE OIG BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P2CWN9-10-0107-2300091 FED WAY WATER AND SEWER WA 9/30/92
Summary: INELIGIBLE COSTS OF \$1,304,725 CONSISTED OF \$67,287 FOR UNALLOWABLE CONSTRUCTION COST; \$61,048 RELATED TO INELIGIBLE CONSTRUCTION PERCENTAGE; \$21,243 OF UNAPPROVED ARCHITECT/ENGINEERING FEES; AND \$1,155,147 RELATED TO EXCESS CAPACITY. ALSO QUESTIONED WERE \$2,242,049 AS UNSUPPORTED.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS OBTAINING ADDITIONAL INFORMATION FROM THE GRANTEE AND THE STATE TO REVIEW/RESOLVE ISSUE OF GRANT ELIGIBLE COSTS FOR A 30-YEAR PLAN VS A 20-YEAR PLAN. THE ADDITIONAL DOCUMENTATION WAS TIME CONSUMING TO OBTAIN SINCE THE PROJECT IS 15 YEARS OLD.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REGION WILL ISSUE A DRAFT FINAL DETERMINATION LETTER TO THE OIG BY MAY 31, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

P5CG*8-10-0076-1100146 WASHINGTON DEPT OF ECOLOGY WA 3/20/91
Summary: COSTS QUESTIONED FOR IMPROPER PROCUREMENT, PERSONNEL SERVICES AND INDIRECT COSTS.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: SUPERFUND BRANCH IS WORKING WITH OIG ON A PROCUREMENT ISSUE. SUPERFUND SECTION IS IN THE FINAL STAGE OF REVIEWING ADDITIONAL INFORMATION REQUIRED TO SETTLE THE PROCUREMENT ISSUES. THIS REVIEW REQUIRED ADDITIONAL TIME BECAUSE WAS THE DOCUMENTATION WAS LOCATED IN AUDITEE'S CONTRACTOR FILES.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE DRAFT FINAL DETERMINATION LETTER SHOULD BE ISSUED BY APRIL 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [1]

Assignment Control Number	Title	Final Report Issued	Assignment Control Number	Title	Final Report Issued
P5CG*8-10-0084-1100156	ALASKA DEPT OF ENV CONSER	AK 3/29/91	P5CGL0-10-0066-2100299	WASH DOE MULTI-SITE	WA 3/30/92
Summary: COSTS QUESTIONED AS INELIGIBLE FOR SUBCONTRACTOR SERVICES NOT PERFORMED; EXCESS PROFIT AND ENGINEERING SERVICES PERFORMED ON SITES OUTSIDE THE SCOPE OF THE COOPERATIVE AGREEMENT.			Summary: GRANTEE DID NOT PROCURE SERVICES IN A MANNER THAT ASSURED REASONABLE PRICE OR THAT BEST OFFERORS WERE AWARDED CONTRACTS. ALSO, MANAGEMENT CONTROLS NEED STRENGTHENING TO PROPERLY RECORD AND CLAIM TO GRANTS. FINALLY, CONTRACTOR PERFORMANCE MONITORING NEEDS IMPROVEMENT.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS NEGOTIATING WITH THE IG ON PROCUREMENT AND LEAVE ISSUES. THE LEAVE ISSUE HAS BEEN THE MAJOR DELAYING FACTOR SINCE IT IS A CROSSCUTTING ISSUE WITH SEVERAL STATES. A DRAFT FINAL DETERMINATION LETTER WAS ISSUED TO THE IG ON MARCH 30, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION RECENTLY RECEIVED ADDITIONAL DOCUMENTATION FRC THE GRANTEE RELATED TO A COST PLUS PERCENTAGE CONTRACT ISSUE. THE AUDITEE'S DELAY IN PROVIDING THIS INFORMATION POSTPONED THE RESOLUTION OF THIS AUDIT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: UNLESS THE OIG DOES NOT AGREE WITH THE DECISION, THE FINAL DETERMINATION SHOULD BE ISSUED BY MAY 25, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: A DRAFT FINAL DETERMINATION LETTER WILL BE FORWARDED TO THE OIG E APRIL 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (The OIG received the draft final determination letter on April 6, 1993.)			IG FOLLOWUP STATUS AS OF 3/31/93 [2]		
P2CW*7-10-0046-1200039	BRISTOL BAY, BOROUGH	AK 9/30/91	P5BGL1-10-0046-2100612	IDAHO DHW S/F COOP AGREEM.	ID 9/15/92
Summary: BRISTOL BAY BOROUGH, NAKNEK, ALASKA (THE GRANTEE) CLAIMED INELIGIBLE COSTS OF \$1,145,973 AND UNSUPPORTED COSTS OF \$6699. ALSO, COSTS OF \$148,200 WERE QUESTIONED AS UNNECESSARY/UNREASONABLE.			Summary: COSTS QUESTIONED AS UNSUPPORTED FOR; CONTRACTUAL SERVICES FOR WHICH IDHW DID NOT FOLLOW PROPER PROCUREMENT PROCEDURES, AND PERSONNEL COSTS BECAUSE IDHW DID NOT ALLOCATE FRINGE BENEFIT COSTS IN ACCORDANCE WITH OMB CIRCULAR A-87.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A DRAFT FINAL DETERMINATION LETTER WAS SENT TO THE OIG FOR CONCURRENCE ON FEB. 24, 1993. THE OIG HAS CODED THIS RESPONSE AS INCOMPLETE BUT HAS NOT YET FORWARDED CORRESPONDENCE TO THE REGION CONCERNING THIS DETERMINATION. THE REGION PLANS TO RESPOND QUICKLY TO THE OIG'S CONCERNS, BUT CANNOT ESTIMATE A FINAL DETERMINATION DATE UNTIL THE OIG'S POSITION IS REVIEWED.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION SENT A DRAFT FINAL DETERMINATION LETTER TO TH OIG ON JANUARY 21, 1993. THE OIG RESPONDED TO THE REGION ON MARCH 22, AGREEING WITH THE REGION'S DECISIONS CONCERNING THE AUDIT FINDINGS BUT STIPULATING THAT THE REGION NEEDED TO ARTICULATE ITS FOLLOW-UP COMMITMENTS. THE REGION DISAGREED IN PRINCIPLE. THE GRANTEE HAS BEEN APPRISED OF THE DECISIONS REGARDING THE AUDIT FINDINGS. THE REGION AND THE OIG HAVE BEEN REQUESTED TO RESOLVE THE FOLLOW-UP ISSUE. THE ISSUE HAS ALSO BEEN REFERRED TO AN AGENCY-WIDE TASK FORCE ON AUDIT MANAGEMENT.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION:		
IG FOLLOWUP STATUS AS OF 3/31/93 [1] (The OIG discussed the above report with a Regional Representative on March 12, 1993. In this discussion, we agreed that additional discussion between the Region and OIG Western Audit Division will be needed in order to come up with the allowable project costs.)			IG FOLLOWUP STATUS AS OF 3/31/93 [2] (OIG agrees with the above statu:		
P5CHN9-10-0155-1300047	WASHINGTON DEPT OF ECOLOGY	WA 3/26/91	P2CW*8-10-0021-2200029	UNALASKA, CITY OF	AK 9/10/92
*Summary:			Summary: FINAL AUDIT OF CONSTRUCTION GRANT NOS. COS0064-01, C AND 03 FOR CITY OF UNALASKA, AK. THE GRANTEE CLAIMED INELIGIBLE UNSUPPORTED, AND UNNECESSARY/UNREASONABLE COSTS OF \$234,046, \$52,900 AND \$299,235 RESPECTIVELY.		
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION SUBMITTED A DRAFT FINAL DETERMINATION AND RECEIVED OIG CONCURRENCE ON FEBRUARY 18, 1993.			- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION SUBMITTED A DRAFT FINAL DETERMINATION LETTER T OIG ON FEBRUARY 2, 1993. AS OF 4/20/93, THE OIG HAS NOT PROVIDE A WRITTEN RESPONSE TO THIS DRAFT FINAL DETERMINATION LETTER.		
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REGION ISSUED THE FINAL DETERMINATION LETTER TO THE GRANTEE AND SENT A COPY TO THE OIG ON MARCH 31, 1993. THIS AUDIT WAS CLOSED IN THE OIG TRACKING SYSTEM ON APRIL 20, 1993.			= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: DEPENDING ON IG RESPONSE TIME TO DRAFT FINAL DETERMINATION LETTER, REGION WILL ISSUE THE FINAL DETERMINATION LETTER BY MAY 30, 1993.		
IG FOLLOWUP STATUS AS OF 3/31/93 [3] (The response was received by the OIG and the audit was closed on April 20, 1993.)			IG FOLLOWUP STATUS AS OF 3/31/93 [2] (On March 17, 1993, we analyze: and discussed the draft final determination letter with the Regional Representative. The OIG informe the Region of the concerns in that in four of the eleven instances, the Alaska Department of Environmental Conservation (ADEC) claims that the criteria used in the audit report did not exist. V informed the Region that the criteria did exist and that ADEC needs to address this. We agreed to code the response as incomplete and that the Region would look into the matter.)		
P5CGN0-10-0011-1300066	WASHINGTON DEPT OF ECOLOGY	WA 5/ 7/91			
Summary: THE WASHINGTON DEPARTMENT OF ECOLOGY DID NOT PROCURE ITS CONTRACTS IN A MANNER THAT ASSURED A REASONABLE PRICE OR THAT THE BEST OFFERORS ARE AWARDED CONTRACTS. WDOE NEEDS TO STRENGTHEN MANAGEMENT CONTROLS. WDOE CLAIMED COSTS THAT WERE NOT ALLOCABLE TO THE COOPERATIVE AGREEMENT.					
- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS NEGOTIATING WITH THE OIG ON A PROCUREMENT ISSUE. ADDITIONAL TIME HAS BEEN NEEDED TO REVIEW THE COST PRICE ANALYSIS AND APPROPRIATE AWARD ISSUES.					
= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: A DRAFT FINAL DETERMINATION LETTER SHOULD BE SUBMITTED TO THE OIG FOR REVIEW BY APRIL 30, 1993.					
IG FOLLOWUP STATUS AS OF 3/31/93 [1]					

Assignment Control Number	Title	Final Report Issued
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E2AWP2-10-0002-2400024 NPDES PERMIT		AK 3/12/92
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Summary: REGION 10 MADE AN IMPROPER AND INADEQUATELY DOCUMENTED DECISION TO ISSUE A NPDES PERMIT FOR SEAFOOD WASTE DISCHARGE INTO A RELATIVELY PRISTINE ALASKAN BAY. REGION 10 DELAYED IN ENFORCING OVER 170 VIOLATIONS OF THE PERMIT CONDITIONS, INCLUDING ILLEGAL DISCHARGE.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE REGION IS NEGOTIATING WITH OIG ON PERMIT MODIFICATIONS.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE REGION EXPECTS TO HAVE PUBLIC NOTICE TO ACHIEVE THE PERMIT MODIFICATIONS AND ISSUE A FINAL DETERMINATION LETTER TO THE GRANTEE BY JUNE 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [2]

E3BG*6-10-0066-8100761 MOSES LAKE IRR & REHAB DIST WA	8/31/88
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Summary: INTERIM AUDIT OF DEMONSTRATION GRANT TO RESTORE MOSES LAKE AND TO CONTROL NON-POINT POLLUTION SOURCES FOUND TOTAL COSTS QUESTIONED OF \$2,439,103 (F.S. \$1,205,039). GRANTEE USED STANDARD METHODOLOGY INSTEAD OF DEVELOPING NEW INNOVATIVE TECHNIQUES.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: THE HEADQUARTER OIG AND THE OFFICE OF WATER ARE REVIEWING ISSUES THAT ARE STILL NOT RESOLVED. THE OFFICE OF THE GENERAL COUNSEL ESTABLISHED A LEGAL TEST TO ADDRESS THE ISSUES UNDER REVIEW.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: A FINAL DETERMINATION LETTER SHOULD BE ISSUED BY DECEMBER 31, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [6]

P2CWL8-10-0007-2100664 LOON LAKE SEWER DIST NO 4 WA	9/30/92
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Summary: THE GRANTEE CLAIMED INELIGIBLE ADMINISTRATIVE, LEGAL SETTLEMENT, ENGINEERING AND MISCELLANEOUS AND CONSTRUCTION COSTS TOTALING \$204,089. ALSO CLAIMED WERE \$141,943 IN UNNECESSARY AND UNREASONABLE CONSTRUCTION COSTS RELATED TO OVER DESIGN OF THE PLANT.

- EXPLANATION OF THE REASONS MANAGEMENT DECISION HAS NOT BEEN MADE: A DRAFT FINAL DETERMINATION LETTER WAS FORWARDED TO THE OIG FOR CONCURRENCE ON JANUARY 7, 1993. ON FEB.18, 1993 THE OIG RESPONDED TO THE DRAFT FINAL DETERMINATION LETTER. THE REGION IS GATHERING ADDITIONAL INFORMATION TO ADDRESS THE OIG'S CONCERNS INCLUDING SUPPORTING INFORMATION ON THE 75 PERCENT FLOW ISSUE.

= DESIRED TIMETABLE FOR ACHIEVING A MANAGEMENT DECISION: THE FINAL DETERMINATION SHOULD BE ISSUED BY APRIL 30, 1993.

IG FOLLOWUP STATUS AS OF 3/31/93 [2]

TOTAL AUDITS ISSUED BEFORE REPORTING PERIOD FOR WHICH NO MANAGEMENT DECISION WAS MADE DURING THE REPORTING PERIOD: 146

* = Agency procedures do not require the IG's approval on Agency's Management Decision on an audit (other than a preaward or an internal and management audit) with the Federal share of questioned costs of less than \$100,000. Therefore, we have not provided a summary of the audit.

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