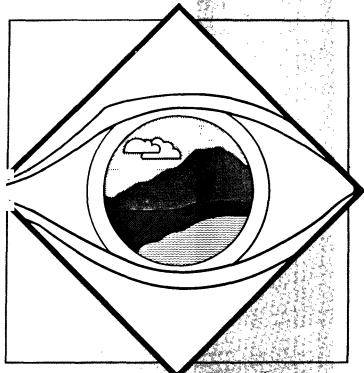
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PA Office of .. ispector General Report to Congress

Fiscal 1990



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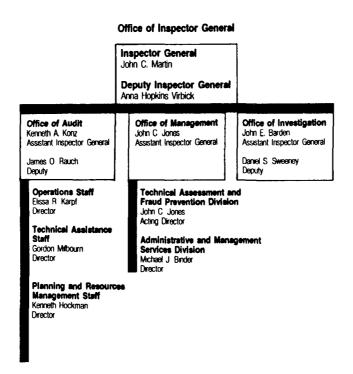
The Inspector General Act of 1978 (P.L. 95-452), as amended, created the Office of Inspector General to consolidate existing investigative and audit resources in independent organizations headed by Inspectors General.

The OIG's role is to review EPA's financial transactions, programs, and administrative activities; investigate allegations or evidence of possible criminal and civil violations; and promote economic, efficient, and effective operations within the Agency.

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 and allows it to function as the Agency's fiscal and operational watchdog.



OIG Divisional Inspectors General are listed on the back panel.

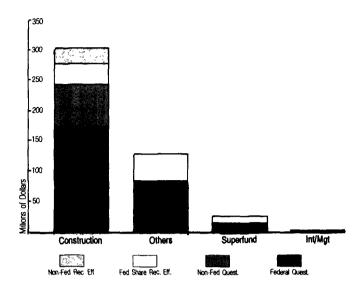
Information reported in the semiannual report for the period ending March 31, 1990 may have been adjusted subsequent to the end of that period. Consequently, totals for the two periods may not add to the fiscal year totals presented below.

Audit Operations	Fiscal 1990		
 Questioned Costs - Total* - Federal Share 	\$267.7 Million \$199.2 Million		
 Recommended Efficiencies (Funds be Put to Better Use)	\$184.7 Million \$162.0 Million		
 Costs Disallowed to be Recovered Federal Share (costs which EPA management agrees are unallowable and is committed to recover or offset against future payments) 	\$ 73.9 Million		
Costs Disallowed as Cost Efficiency - Federal Share (funds made available by EPA management's commitment to implement recommendations in OIG performance or preaward audits)	\$119.3 Million		
 Recoveries from Audit Resolutions of Current and Prior Periods (cash collections or offsets to future payments)** 	\$ 56.8 Million		
 EPA Audits Performed/Issued by OIG 	1928		
 Audit Reports Resolved (agreement by Agency officials to take satisfactory corrective action) 	671		
Investigative Operations			
Fines and Recoverles (including civil) Investigations Opened Investigations Closed Indictments of Persons or Firms Convictions of Persons or Firms Administrative Actions Taken Against EPA Employees	\$3,805,579 242 251 17 15		
Fraud Detection and Prevention Operations			
 Debarments, Suspensions, Voluntary Exclusions, and Settlement Agreements (actions to deny persons or firms from participating in EPA programs or operations because of misconduct or poor performance) 	140		
 Hotline Complaints Received Proposed Legislative and Regulatory Items Reviewed Personnel Security Investigations Adjudicated 	47 159 725		
* Questioned Costs: Ineligible, Unsupported and Unnecessary/Unreasonable; and Recommended Efficiencies (Funds be Put to Better Use) are subject to change			

⁽Funds be Put to Better Use) are subject to change pending further review in the audit resolution process.

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

Questioned Costs and Recommended Efficiencies by Type of Report - FY 90



Examples of Significant Audits

The following represents examples of some of our most significant types of findings. They should not be considered representative of the overall adequacy of EPA management.

Audit Spurs Rapid Action to Tighten Controls Over Banned Pesticides

We found that EPA had not monitored and periodically inspected most banned pesticide storage locations to determine whether the pesticide was safely stored nor always required holders to overpack corroding or leaking containers to prevent spills. EPA had not informed banned pesticide holders of their legal obligation to notify emergency planners and fire officials of banned pesticide storage locations or emergency handling procedures. Regions and States could not fully identify and inspect all known banned pesticide storage locations because EPA had not fully developed procedures to match Headquarters, Region, and State records. EPA had not investigated cases where EPA pesticide contractor records suggested questionable holder disposal actions.

EPA acted promptly on all the issues we raised during the audit. During our review, EPA issued a banned pesticide strategy to its Regions and the States requiring them to monitor and inspect storage locations. EPA also implemented a plan to have emergency planners and fire officials receive its banned pesticide storage location list. In addition, EPA took initiatives to better account for the banned pesticide quantities and storage locations.

Increased Efforts Needed to Protect the Public Against Lead in Drinking Water

EPA and the States in Region 3 were not ensuring that school children and the public were adequately protected against excessive levels of lead in drinking water. EPA estimates that every year over 250,000 children are exposed to lead in drinking water at a level high enough to impair their intellectual and physical development. The 1986 amendments to the Safe Drinking Water Act banned the use of lead materials in new plumbing and in plumbing repairs and required water suppliers to notify the public about lead in their drinking water. In 1988, the Lead Contamination Control Act required EPA, States, the Consumer Product Safety Commission, and schools and day care centers to safeguard children from the hazards of lead in drinking water. We found that the States in Region 3 had not developed adequate programs to assist schools and day care centers deal with lead contamination in their drinking water. While some of the schools did limited, improper, or no testing, many schools testing found that their water contained unacceptable levels of lead. EPA did not pursue the States' lack of enforcement concerning the public notification and lead ban requirements of the SDWA.

Prior to the issuance of our draft report, EPA promptly took corrective action on our finding concerning confusion over acceptable limits of lead in drinking water from school fountains. The Office of Drinking Water developed an Alert for Laboratory Directors requesting their assistance in notifying school administrators that EPA recommends they take remedial action whenever lead levels exceed 20 ppb at one of their drinking water outlets.

Inadequate User Charges Jeopardize Billions of Public Investment Dollars in Wastewater Treatment Plants

About \$75 billion of Federal, State, and local monies have been invested to construct and/or rehabilitate approximately 15,600 municipal wastewater treatment facilities to prevent continued degradation of the nation's waters and restore contaminated rivers, lakes, and streams. The Clean Water Act requires that grantees generate sufficient revenues to cover the operation and maintenance costs of their wastewater treatment facilities. We found that EPA was not ensuring that grantees continually generate enough income through adequate user charge systems to meet operation and maintenance costs of their wastewater treatment plants. Local governments' failure to adequately fund the operation and maintenance of some treatment plants has already caused deterioration and failure of the facilities and degradation of water quality. Some were not capable of functioning at their designed level of operation and were in violation of their effluent permits.

Stronger Enforcement Needed to Prevent Damage From Oil Spills

Over two years after the massive oil spills at the Ashland Oil facility in Pennsylvania and the Shell Oil facility in California, aggressive enforcement actions were not always taken when violations of EPA's Oil Pollution Prevention regulations were disclosed. EPA's Oil Pollution Prevention regulations implement the oil spill prevention and removal provisions of the Clean Water Act. These regulations require the owners and operators of certain oil storage facilities to prepare Spill Prevention Control and Countermeasure (SPCC) plans outlining measures to prevent spills and contain those that do occur before they reach navigable waters. EPA's Region offices administer an inspection program to ensure that facilities comply with the regulations. Although the Agency has initiated some corrective measures as a result of past reviews, more action is clearly needed. While Regions 5 and 6 had effective SPCC enforcement programs, we found that effective enforcement action was not always taken by Regions 3 and 4 against facilities that violated EPA's Oil Pollution Prevention regulations. The enforcement actions taken by Regions 3 and 4 did not ensure that violating facilities eventually achieved compliance with the Agency's regulations.

Region 4 Wetlands Program Needs Significant Improvements

Wetlands are a valuable natural resource which provide many essential functions, such as maintaining ground-water quality, protecting shorelines from erosion, and serving as habitat for a large diversity of birds and fish. Only about 95 million acres of the original 215 million acres of wetlands in the contiguous United States remain today. Unless program changes and improvements are undertaken, further erosion of the Southeast's valuable and vulnerable wetlands resources are inevitable. We found that Region 4 had not effectively managed the wetlands protection program to minimize wetlands losses. The Region had not (1) identified wetlands for permitting, (2) imposed stringent enforcement actions against unpermitted discharges, (3) established adequate procedures and controls for monitoring public notice reviews to influence Corps of Engineers permit decisions, or (4) established an overall strategy for guiding development of delegated State responsibilities under the Clean Water Act. As a result, wetlands losses were justified based on developers' promises of future wetlands creation, restoration, or enhancement.

Over \$29 Million of Questioned Costs Claimed by Honolulu, Hawaii

We found that EPA awarded thirteen grants totaling \$54,208,201 to the City and County of Honolulu, Hawaii, to fulfill multiple objectives, including the construction of wastewater treatment facilities and collector systems. We questioned \$17,655,814 of the grantee's final claim as

ineligible. We also questioned, as unreasonable, \$8,533,513 for underutilized facilities that were operating at less than 75 percent of their design capacity and \$551,639 for a planning grant which was never completed and for which design and construction grants had never been awarded. The grantee also claimed \$2,493,500 of unnecessary costs incurred for equipment items that were not in service.

San Diego, California, Claimed \$36.6 Million of Questioned Costs

We found that EPA awarded three grants totaling \$26,916,934 to the City of San Diego for the construction of improvements at Pump Station No. 2 and the Point Loma Wastewater Treatment Plant. We questioned \$13,177,522 of the grantee's final claim as ineligible. We also questioned \$14,641,849 of unreasonable technical services costs in excess of the approved grant amounts and project costs pending submission of an approvable sewer use ordinance. The grantee also claimed \$8,823,346 of unnecessary costs incurred for the construction of gas utilization facilities with no water quality benefits. The facilities were constructed to generate electricity for sale.

Region 4 Inadequately Managed Superfund "Removial" Cleanups

Region 4's inadequate implementation and ineffective management of Superfund "removial" cleanup actions (1) did not meet "removial" goals to expedite remedial cleanup and to delete sites from EPA's National Priorities List (NPL) (delisting), and (2) resulted in over \$3.8 million in potentially excessive costs and obligations. Region 4 ambitiously initiated a pilot "removial" cleanup approach which used removal authorities to expedite remedial actions and NPL site delisting at less cost than projected for remedial cleanups. Eight NPL sites scheduled for remedial actions in fiscal 1988 were selected for "removial" cleanup. We found that after two years and \$15 million in obligations, of which \$8.7 million had been expended, only 3 of the 8 sites had been partially cleaned and none had been delisted.

Millions Owed Superfund Trust Fund Were Not Promptly Collected

Our annual audits of the Superfund trust fund have consistently reported that amounts due from cost recovery actions were not timely recorded. Those reports warned the Agency that a large number of unrecorded receivables significantly lessens management control over their collection. In response, the Agency instituted actions seeking improved controls over Superfund receivables. We found that Agency-wide controls over Superfund receivables had not improved. EPA Headquarters and Regions 3, 4 and 5 were not promptly recording in the Agency's financial management system, monies owed by responsible parties, resulting in at

least \$103,856 of lost interest to the trust fund. For fiscal 1989, \$5.3 million of \$5.9 million, or 90 percent of the costs to be recovered, were not recorded promptly as accounts receivable. Further, EPA was not promptly collecting amounts owed the Superfund trust fund. If amounts owed by responsible parties were collected promptly, the Government could have invested these monies earlier.

Reliability of Superfund Reporting System in Question

Superfund's management information system, CERCLIS, is the required and sole source of Superfund planning and accomplishment data. CERCLIS was developed to support Superfund program, site, and project management. It was also supposed to be the primary source of data for Superfund strategic decisions. We found that insufficient controls and oversight of EPA's Superfund management information system rendered the data used for Superfund program decisions and action unreliable. Controls and oversight were limited for the initial CERCLIS development effort and subsequent oversight. Essential documentation detailing computer program logic for CERCLIS was poor. Lax controls over CERCLIS report programs allowed programmers to change reports without approval. As a result, reports produced could not be relied upon to provide accurate information for management. CERCLIS officials relied upon negative comments from report users as a way of determining report acceptability.

Region 6 Action Needed to Stop the Loss of Louisiana Coastal Wetlands

We found that EPA's Region 6 was not controlling the negative impacts of oil and gas activities on Louisiana's coastal wetlands. Region 6 failed to issue any National Pollutant Discharge Elimination System (NPDES) general permits for oil and gas discharges into coastal Louisiana wetlands, even though the Federal Water Pollution Control Act (now the Clean Water Act) required the Agency to issue these permits more than 15 years ago. According to Region 6's permitting schedule, another 4 years will pass before all oil and gas general permits are issued. Further, the Region had not initiated wetlands enforcement actions for unpermitted dredge and fill activities. Region 6 did not visit proposed oil and gas dredge and fill sites in coastal Louisiana wetlands as part of its review process, nor does it regularly attend scheduled permit review meetings. Further, the Region has neither denied nor elevated to a higher authority any proposed oil and gas dredge and fill permits in coastal Louisiana.

Audit Resolution

During fiscal 1990, the Office of Inspector General issued 1,928 new audit reports and closed 671. Of the 300 audit reports in the follow-up system at year end, 64 reports remained for which no management decision was made within 6 months of issuance.

Of the audits closed, \$73.9 million of costs were disallowed for recovery, and \$119.2 million were agreed to by EPA management as funds that could be put to better use. The Agency reported cost recoveries from current and prior periods of \$8.3 million in cash collections, and \$48.6 million in offsets against billings.

Agency Improves Control Over Hazardous Waste Exports

A March 1988 audit showed that hundreds of tons of hazardous waste were exported in violation of regulations and that EPA needed a coordinated effort to ensure compliance. Our followup report found that EPA had responsibly implemented many corrective actions: EPA's National Enforcement Investigations Center referrals resulted in enforcement actions with penalties ranging from \$5,000 to \$41,000; EPA and Customs inspected hazardous waste exports at 15 border locations; because of EPA training, Customs increased manifest collection tenfold; and after receiving reminders from EPA, 300 companies reported their hazardous waste exports in 1988, a 400 percent increase.

Chesapeake Bay Deficiencies Not Corrected

Almost four years after the first of two audit reports on the Chesapeake Bay Program was issued, EPA Region 3 had not resolved many of the deficiencies disclosed in those reports. The reports evaluated procedures for administering grants and contracts valued at about \$50 million. During February 1990, we completed a followup review of the corrective actions taken by Region 3 as a result of these audits. We found that the corrective actions taken were neither effective nor completed timely. The action plan submitted in response to the first audit required Region 3 to determine the status of 29 grants and contracts and to close out those that were not ongoing. We found that 6 projects were ongoing and Region 3 had properly completed or closed only one of the remaining 23 grants and contracts. Region 3 could not locate the official files for 14 of these 23 projects. Additionally, the corrective actions proposed as a result of the second Chesapeake Bay audit were also not completed. After we issued our followup report. Region 3 took action to correct the deficiencies. Region 3 reduced the excessive Federal funds retained by Pennsylvania. The shortage of state matching funds was resolved and significant progress was made to obtain overdue work products.

During this fiscal year, our investigative efforts resulted in 32 indictments and convictions and over \$3.8 million of fines and recoveries from persons or firms who defrauded the Agency.

Pipe Company Owner Sentenced in Fraud Case

Theodore A. Gallucci, owner of Tag Pipe, Inc., the principal supplier of fabricated pipes and pipe fittings to New York City's water and sewer main contractors, was sentenced on December 11, 1989, after pleading guilty to charges of conspiring to transport stolen pipes for use on EPA-funded projects, and to commit tax evasion. He received 3 years probation. The scheme involved the theft of about \$1 million in New York City property by paying city employees responsible for maintaining the city's pipe yards about \$250,000 in bribes for access to the material in those yards. The investigation was conducted jointly by the EPA Office of Inspector General, the New York City Department of Investigations, the Office of Inspector General of the New York City Office of Environmental Protection, the Internal Revenue Service, and the Federal Bureau of Investigation.

Asbestos Contractor Convicted on Bribe Charge

Robert Henkel, former president of HRF Surface Cleaning Inc., was convicted on June 7, 1990 on one count of bribing an EPA asbestos inspector to avoid job sites at which asbestos removal projects were being carried out. Henke! was sentenced to two years in prison, of which 18 months was suspended, and fined \$100,000. He was also placed on three years probation following his prison term. Henkel is the 23rd asbestos removal contractor to have either pled guilty or been convicted of paying bribes. The inspector was sentenced last year for conspiring to accept bribes of more than \$170,000 from asbestos removal contractors during the years 1983 through 1987. He was sentenced to 5 years incarceration, of which 4-1/2 years was suspended. A joint investigation of asbestos removal contractors in the New York metropolitan area by the EPA Office of Inspector General and the Office of Labor Racketeering of the U.S. Department of Labor has resulted in the indictment of 28 contractors, representing 22 companies. To date, \$781,000 in fines has been assessed.

Superfund Contract Laboratory Program Investigation Yielding Formidable Results

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. An example follows.

Contract Lab Supervisor Indicted

Dr. Vinh Tran, a former group leader of the Gas Chromatograph/Mass Spectrometer Unit at Weston Analytics, Lionville, Pennsylvania, a division of Roy F. Weston, Inc., was charged on July 30, 1990 with two counts of making false statements to EPA. Dr. Tran had allegedly engaged in backdating laboratory analysis results of certain water and soil samples obtained from various Superfund sites by EPA and submitted to Weston for analysis. It is further alleged that Dr. Tran acted to conceal the fraud by a process known as "time travel" which involved setting back the computer clock attached to the Gas Chromatograph/Mass Spectrometer instruments to a date and time earlier than the actual date and time in order to meet sample testing requirements set by EPA. As reported previously, Roy F. Weston, Inc., paid the Government \$750,000 as part of a consent judgment in response to a civil action filed by the Department of Justice under the False Claims Act.

Suspension and Debarment Activities

EPA's policy is to do business only with contractors, grantees, and persons who are responsible, honest, and who comply with applicable rules and regulations. EPA enforces this policy by suspending or debarring any organization or person for acting improperly, having a history of substandard work, or willfully failing to perform on EPA or other Federally funded activities. Suspensions and debarments deny participation in Agency programs and activities to those who represent a risk of abuse to the Government.

A nonprocurement debarment or suspension by one Agency is effective in all. The General Services Administration (GSA) publishes a "List of Parties Excluded from Federal Procurement or Nonprocurement Programs."

In fiscal 1990, 140 debarment or suspension actions were taken. Examples include:

Samar Chatterjee, general manager and sole stockholder of AES Engineers, Inc., (AES) of Illinois, and president and member of the Board of Directors of Universal Engineering Services, Inc. (UES) of Indiana, pled guilty to knowingly, willfully and unlawfully participating in a scheme to defraud EPA. He was sentenced to 4 years imprisonment; probation for a 5 year period; and ordered to pay restitution of \$110,000 each to EPA and the South Stickney, Illinois, Sanitary District. Chatterjee, UES and AES were debarred by EPA from Federal procurement and assistance programs for 3 years.

EPA's OIG has uncovered adequate evidence supporting a reasonable belief that one of EPA's Contract Laboratory Program (CLP) participants, Metatrace, and one of its officials, Carol Byington, may have committed acts of fraud and failed to perform in accordance with the EPA CLP protocols. Accordingly, EPA suspended Metatrace and Carol Byington from participation in Federal assistance, loan and benefit programs and activities, and all direct Federal procurement, for a temporary period pending completion of investigation or ensuing legal, debarment, and/or Program Fraud Civil Remedies Act proceedings.

EPA debarred Robert L. Jackson, former vice president of Great Lakes Dredge and Dock Company, from participation in Federal assistance, loan, and benefit programs for 2 years commencing December 11, 1989. Jackson pled guilty to conspiring to rig bids for dredging contracts in the Gulf of Mexico. Jackson was also debarred from contracts under the Federal Acquisition Regulation by the Department of the Army for 9 months.

James Electric Company, Inc., of Huntington, West Virginia, its President, Leonard T. James, JACO (an affiliated firm), and its President, Maribeth James, were debarred for 3 years in February 1990 for circumventing the EPA debarment process. EPA had debarred James Electric Co., on

December 12, 1987, following conviction for bid rigging on an EPA-funded construction project. Following the James Electric indictment, Maribeth James, Leonard James' wife, incorporated a new electrical company, JACO, which subsequently won a subcontract on an EPA-funded construction project in Huntington. All evidence indicated that James Electric had actually performed the work on the project, not JACO.

Personnel Security Program

The Personnel Security Program is one of the Agency's first line defenses against fraud, using background investigations to review the integrity of EPA employees and contractors. During fiscal 1990, 725 investigations were reviewed, resulting in:

- Six employees resigned pending administrative removal for falsification of the SF-171, Application for Federal Employment. The falsifications included: not listing prior convictions, claiming college degrees not earned, misuse of Government funds for personal gain, timecard fraud, and using multiple social security numbers.
- Seven employees received oral or written reprimands for failing to list previous convictions on the SF-171.
- Two contractor employees were denied access to confidential business information because of failure to list previous convictions and terminations, and use of controlled substances, on the SF-86, Questionnaire for Sensitive Positions.
- Twenty employees were required to submit corrected SF-171s or SF-86s to list minor offenses they had failed to report.
- One employee resigned pending administrative removal for failure to qualify for a required security clearance because of continuous use of controlled substances.

Committee on Integrity and Management Improvement (CIMI)

The Committee on Integrity and Management Improvement, established in 1984 by EPA Order 1130.1, coordinates the Agency's efforts to minimize the opportunities for fraud, waste. and mismanagement and advises the Administrator on policies to improve the efficiency and effectiveness of EPA's programs and operations. Chaired by the Inspector General, CIMI completed several projects including an Awareness Bulletin on Time and Attendance and an Awareness Bulletin on Acceptance of Food, Refreshments or Entertainment. CIMI also developed and coordinated a series of special events during Public Service Recognition Week, to communicate support and appreciation to EPA employees at all levels. The program, hosted by EPA's Administrator, William Reilly, was highlighted by speeches from Dr. Jerome Karle, a Nobel Prize winner, and Dr. Frances Kelsey, formerly of the Food and Drug Administration, who was primarily responsible for stopping the importation of thalidomide into the United States.

The OIG Hotime Center receive or new complaints and closed 48 cases during fiscal 1990. Of these, 18 resulted in environmental, administrative, or prosecutive action. We also received 2,986 calls in which callers were referred to the appropriate program office, State agency, or other Federal agency for assistance.

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The following are examples of corrective action taken as a result of information provided to the hotline center.

- A complaint alleged that a company was emitting fumes which were polluting the air. A review of the complaint disclosed that the company was performing open spray painting in violation of State air quality regulations which prohibit the emission of air contaminants over the property of other persons. Based on our inquiry, State authorities informed the company of the violation, and the company agreed that no further open spray painting would be conducted on the property. The company was also advised by the State that any future violations would result in enforcement action.
- A complaint alleged that a company was injecting oil into the ground, as well as other toxic chemicals such as PCBs and hydraulic fluids. A review of the complaint disclosed that a sample of oil taken from the ground contained a PCB content of 97 parts per million, which constitutes a disposal of PCBs in an improper manner. As a result of this complaint, the company was required to excavate the soil to a level at which less than 10 parts per million were found and to transport the contaminated soil to a disposal facility. The company was also assessed a penalty of \$5,000.

If you are aware of any fraud, waste, or mismanagement, please contact the EPA Inspector General Hotline or the appropriate Divisional Inspector General listed on back.

- Information is confidential.
- Caller may be anonymous.
- Calls can be made toll free on (800) 424-4000. Callers in area code 202 should use 382-4977. FTS network callers may also use 382-4977.

Remember —Act Like It's Your Money—It Is!

Divisional Inspectors General

Region	Subject	Name	Telephone
Headquarters	Audit (Internal Audit Div)	Edward Gekosky	FTS 398-8222 (703) 308-8222
	Investigations (Wash. Fld Office)	Francis C. Kiley	FTS 398-8282 (703) 308-8282
1 & 2	Audit	Paul McKechnie	FTS 835-3160 (617) 535-3160
	Investigations	Robert M. Byrnes	FTS 264-0399 (212) 264-039§
3	Audit	Paul R. Gandolfo	FTS 597-0497 (215) 597-0497
	Investigations	Martin Squitieri	FTS 597-9421 (215) 597-9421
4 & 6	Audit	Mary Boyer	FTS 257-3623 (404) 347-3623
	Investigations	James F. Johnson	FTS 257-2398 (404) 347-3623
5	Audit	Anthony Carrollo	FTS 353-2486 (312) 353-2486
5, 7 & 8	Investigations	Alex Falcon	FTS 353-2507 (312) 353-2507
7 & 8	Audit	Nikki Tinsley	FTS 276-7824 (913) 551-7824
9 & 10	Audit	Truman R. Beeler	FTS 974-7084 (415) 454-7084
	Investigations	H. Brooks Griffin	FTS 454-8151 (415) 974-8151