

A PROFILE OF EPA ACTIVITIES

Program Evaluation Division
Office of Management Systems
and Evaluation
July, 1983

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Introduction

The overall purpose of the study on meeting EPA's post-delegation responsibilities is to examine the implications for EPA of the delegation of programs to State and local government. Such an examination requires useful, objective information about trends and opinions both inside and outside EPA which could affect the Agency's future work. The information needed includes data on environmental trends, an analysis of current thinking in State-Federal relations, outside views on how other organizations handle the problems of decentralized management, and informed opinion on EPA's performance in meeting its current responsibilities.

This report presents results from one of these information-gathering efforts. It consists of a functional profile of EPA's work, as divided among 23 different activities. The objective of this profile is to provide a factual baseline picture of what EPA does as an agency, organized by function (e.g., standard-setting, research, direct administration of programs, technical support). Further discussions of what the Agency might or should do in the future can draw on this baseline in developing options for management choices, especially in describing what the implications of these choices might be.

Data for this report were obtained from EPA's Regional and Headquarters offices. Offices were asked to give their best estimates of the percentage of their current (1983) workyears and contract dollars which are devoted to each activity. We asked for percentages because we felt that they were appropriate to the level of precision needed for this study, and that this would encourage program managers to classify their offices' activities by reflecting on the real work of their staff.

Several respondents expressed some concern that this data would be specifically used to critique their budget submissions. We addressed this concern by promising that this data would not be used in connection with resource allocation decisions, as we felt that only by making this pledge could we expect to get valid results. We believe that while the results of this effort are useful and accurate as an aggregate picture of EPA's work, it would not be appropriate to compare this data to detailed budget submissions for individual offices. These budget submissions are generated by a very different system which operates under a very different set of rules and assumptions.

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To collect the data reported in this profile, we used the following process.

- o A draft list of activities and definitions was developed by the Program Evaluation Division. This list was reviewed throughout the Agency for clarity and comprehensiveness.
- o Based on this review, a revised list of activities and definitions was developed. This revised list was sent to all Headquarters and Regional offices, along with detailed instructions on how to classify each office's work among the various activities (see Attachment 1).
- o Regional offices reported their classifications back to EPA Region I, which kept track of the submissions and checked for reporting errors (e.g., percentages which failed to add up to 100). The Program Evaluation Division performed the same function for Headquarters offices. All Headquarters and Regional offices responded to the request for information except Region VII's Office of Regional Counsel and Region X's Alaska Operations Office.
- o The raw data were entered into a computer at Headquarters, which generated the summaries presented in this report. The totals for FTE and contract funds reported by each office were used to weigh the percentages reported by that office for each activity.

Several checks have been performed on the data to confirm its quality. Reported total workyears for the Agency differ by less than 2% from EPA's current budget estimate. Contract funds differ by less than 4%, and the bulk of this difference appears to stem from uncertainty about how to count carryover funds and research grants. In addition, the percentages assigned to different categories are relatively consistent among Regions, suggesting that the definitions and classifications were applied on the whole in a similar manner. Finally, while there was no attempt to "second-guess" classifications submitted by individual offices, the data submissions were reviewed and checked with offices if the reports appeared to contain major anomalies.

For these reasons, we are confident that the data is of sufficient quality to serve as a baseline profile of EPA's current activities. However, to our knowledge, there is no other similar profile of EPA activity. The absence of a yardstick against which to compare the results of this exercise suggests the need for caution in interpreting these results. Nevertheless, they should be useful in comparing different scenarios which EPA might pursue in response to changing patterns of delegation over the next five years.

The body of the report is divided into three parts. The first part presents a look at how the Agency as a whole is divided among the 7 categories and 23 activities. Part II presents the results of some comparisons between Headquarters and Regions and among Headquarters and Regional offices. Part III compares three programs -- Air, Water, and Hazardous Waste^{1/}-- each of which have substantial Headquarters and Regional components. Since this report's intent is to be descriptive rather than prescriptive, it presents the results of our analyses in such a way that the reader can draw his or her own conclusions.

A Word About the List of Activities

The appendix to this report contains a definition of each of the 23 activities used as the basis for classifying each offices' work. This is not the only set of activities which could be identified, nor is it the best for all purposes, but it enables us to make the analytical distinctions necessary for this project. In developing the list, we applied three basic principles: simplicity; comprehensiveness; and attention to post-delegation support activities. We realized at the time the list was developed that our choice of a classification scheme would facilitate some analyses and eliminate the possibility of others. This was an unavoidable consequence of the need to develop a list which could be used relatively quickly. Given this need, we tried to anticipate the types of analyses which would be most relevant to this study, and to structure the list so that these analyses could be successfully performed.

For several of the analyses which follow, the 23 activities have been grouped into seven major categories. Both the categories and the activities are listed in Table 1.

^{1/}As used in this report, the "Hazardous Waste" program includes both the RCRA and Superfund programs.

Table 1: List of EPA Activities

I. DIRECT PROGRAM ADMINISTRATION

- A. Permitting, Engineering, and Environmental Impact Reviews
- B. Product Review and Registration
- C. Hazardous Substance Emergency Response and Site Management
- D. Compliance and Enforcement
- E. Program Direction and Interpretation

II. TECHNICAL SUPPORT

- A. Laboratory Services
- B. Development and Distribution of Implementation Tools
- C. Direct Assistance On-Site/Person to Person
- D. Special Projects
- E. Training

III. STATE PROGRAM APPROVAL AND OVERSIGHT

- A. Review of State Programs/Plans/Delegation Applications
- B. Review of Individual Proposed State Actions
- C. Program Review of State Actions

IV. RESEARCH

- A. Standard-Setting Support
- B. Exploratory Research

V. STANDARD-SETTING

- A. Listing Decisions/Designation Activities
- B. Technical Regulations
- C. Administrative Regulations

VI. MANAGEMENT SUPPORT

- A. Policy Activities
- B. Administration and Support Services
- C. Legal Defense

VII. NATIONAL INFORMATION COLLECTION

- A. Formal National Information Systems
- B. Special Requests for Information

ART I: THE AGENCY AS A WHOLE

The data collected for this study confirm the common impression that EPA is highly decentralized. However, they also call attention to the size of the Headquarters component. Out of all EPA workyears, 61% are assigned to Headquarters offices, while 39% are assigned to the Regions. Not all Headquarters employees are located in Washington, of course; the Office of Research and Development (ORD) and the Office of Air, Noise and Radiation (OANR) in particular have large units located elsewhere which are counted in the Headquarters totals.

The figures for contract dollars reflect the Agency's current practices in contract administration. In general, contracts are assigned to allowance holders in Headquarters, which in some cases then reallocates a portion of these to the Regions to satisfy specific Regional needs. As a result, 97% of all the agency's contract dollars are administered from Headquarters offices, while only three percent are allocated directly to the Regions.^{2/}

As noted in the introduction, the 23 activities into which the Agency's work was divided can be grouped into seven general categories. Table 2 shows how the agency divides its workyears and contract dollars among these seven categories.^{3/}

Table 2: Total EPA Workyears and Contract \$ By Category

	<u>Workyear</u> <u>%</u>	<u>Contract \$</u> <u>%</u>
1. Direct Program Administration	26	31
2. Technical Support	9	9
3. State Program Approval and Oversight	8	0
4. Research	12	17
5. Standard-Setting	9	11
6. Management Support	30	29
7. National Information Collection	5	2

A further breakdown of the data among the 23 activities gives a more detailed look at the overall patterns of the Agency's use of workyears and contract dollars. One point to remember when looking at this data is that a "0%" entry does not necessarily mean that absolutely no contract dollars or workyears are spent in this area, but rather that the total figure reported was less than one percent of the Agency total.

^{2/} Because of uncertainties in interpreting the contract dollar percentage breakdowns reported by the Regions, all contract dollar discussions in the remainder of this report will address Headquarters contract dollars only.

^{3/} Totals in this and other tables may not add to 100% due to rounding. For rough comparisons, 1% equals about 106 workyears and \$4.5 million in contract dollars.

Table 3: Total EPA Workyears and Contract \$ By Activity^{4/}

	<u>Workyear</u> <u>\$</u>	<u>Contract \$</u> <u>\$</u>
I. DIRECT PROGRAM ADMINISTRATION		
A. Permitting and Reviews	5	1
B. Product Registration	4	2
C. Hazardous Substance Response	2	22
D. Compliance and Enforcement	10	4
E. Program Direction	4	1
II. TECHNICAL SUPPORT		
A. Laboratory Services	2	4
B. Implementation Tools	2	3
C. Direct Assistance	2	1
D. Special Projects	2	2
E. Training	1	1
III. STATE PROGRAM APPROVAL AND OVERSIGHT		
A. Review of Plans/Applications	3	0
B. Review of Individual Actions	2	0
C. Program Reviews	3	0
IV. RESEARCH		
A. Standard-Setting Support	12	16
B. Exploratory Research	0	1
V. STANDARD-SETTING		
A. Listing Decisions	1	1
B. Technical Regulations	7	10
C. Administrative Regulations	1	1
VI. MANAGEMENT SUPPORT		
A. Policy Activities	10	3
B. Administration/Support	19	25
C. Legal Defense	1	0
VII. NATIONAL INFORMATION COLLECTION		
A. Formal Systems	3	2
B. Special Requests	2	1

PART II: HEADQUARTERS AND THE REGIONAL OFFICES

Another way of looking at the data is to see how workyears in the different categories and activities are divided between Headquarters and the Regions.

Tables 4 and 5 show how Headquarters workyears are divided as compared to the Regional offices. Not surprisingly, both tables show that Headquarters and Regional offices generally do

^{4/}Activity totals may not exactly add up to category totals due to rounding.

ifferent kinds of work. Regional offices are primarily involved in the direct administration of EPA programs as well as the review and oversight of State programs. Headquarters' direct program responsibilities are mainly in the pesticides and toxic substances area; in other areas, Headquarters is primarily a research, standard setting, and management support organization.

The concentration of management support activities in Headquarters reflects a centralization of both administrative support services and policy-related activities. This stands out even more when it is remembered that the Headquarters/Regional split in overall resources is approximately 60/40 in favor of Headquarters.

Table 4: Division of Headquarters, Regional Workyears

	<u>Headquarters Workyear %</u>	<u>Regional Workyear %</u>
Direct Program Administration	17	41
Technical Support	9	10
State Program Approval and Oversight	2	18
Research	20	0
Standard-Setting	14	1
Management Support	36	22
National Information Collection	3	8

Table 5: Activity Workyears at Headquarters, Regions

	<u>Headquarters Workyear %</u>	<u>Regional Workyear %</u>
DIRECT PROGRAM ADMINISTRATION		
A. Permitting and Reviews	1	12
B. Product Registration	7	0
C. Hazardous Substance Response	1	5
D. Compliance and Enforcement	5	18
E. Program Direction	3	6
TECHNICAL SUPPORT		
A. Laboratory Services	2	2
B. Implementation Tools	3	1
C. Direct Assistance	1	4
D. Special Projects	1	2
E. Training	1	2
STATE PROGRAM APPROVAL AND OVERSIGHT		
A. Review of Plans/Applications	1	6
B. Review of Individual Actions	1	4
C. Program Reviews	0	7

<u>Table 5 (continued)</u>	<u>HQ %</u>	<u>RO %</u>
IV. RESEARCH		
A. Standard-Setting Support	19	0
B. Exploratory Research	1	0
V. STANDARD-SETTING		
A. Listing Decisions	1	0
B. Technical Regulations	11	1
C. Administrative Regulations	2	1
VI. MANAGEMENT SUPPORT		
A. Policy Activities	12	7
B. Administration/Support	22	14
C. Legal Defense	1	1
VII. NATIONAL INFORMATION COLLECTION		
A. Formal Systems	2	4
B. Special Requests	2	4

Another interesting item that showed up in the data is the range of percentages which the 10 Regional Offices assigned to each of the seven categories. The highest and lowest workyear percentages reported in each category are presented in Table 6. While there are differences among Regions, it is noteworthy that the largest difference between the high and low values for any category is 15%.

Table 6: Range of Regional Workyear %

	<u>Low %</u>	<u>High %</u>
Direct Program Administration	34	46
Technical Support	5	14
State Program Approval and Oversight	13	28
Standard-Setting	0	3
Management Support	16	27
National Information Collection	6	10

Headquarters offices show somewhat different patterns of activities from one office to another. Table 7 shows these patterns for the workyears of four headquarters offices: Air, Noise and Radiation; Water; Solid Waste and Emergency Response, and Pesticides and Toxic Substances. Table 8 shows the same information for contract dollars. The percentages in each of the seven categories are a percentage of each program's headquarters total.

Table 7: Division of Program Workyears in Headquarters Offices
(Figures are % of total office workyears)

	OANR	OW	OSWER	OPTS
Direct Program Administration	22	22	35	47
Technical Support	12	16	8	9
State Program Approval and Oversight	5	6	7	3
Research	4	1	0	2
Standard-Setting	38	25	21	23
Management Support	16	21	23	13
National Information Collection	3	9	5	3

Table 8: Division of Contract Dollars in Headquarters Offices
(Figures are % of total office contract \$)

	OANR	OW	OSWER	OPTS
Direct Program Administration	27	25	67	31
Technical Support	6	12	12	8
State Program Approval and Oversight	1	1	0	0
Research	6	2	3	4
Standard-Setting	60	39	5	38
Management Support	0	9	10	12
National Information Collection	0	10	2	6

PART III: COMPARISONS AMONG EPA PROGRAMS

Another way of looking at the data collected in this study is to compare patterns among major programs of the agency--specifically the air, water, and hazardous waste programs--which have large Headquarters and Regional components. For the purpose of this analysis, the "hazardous waste" program includes activities conducted under both RCRA and Superfund authorities. The "water" program includes both water quality (including construction grants) and drinking water programs, while the air program includes both stationary and mobile source control activities.^{5/}

Table 9 presents the overall agency percentages of workyears and contract dollars applied to the air, hazardous waste, and water programs.

Table 9: % EPA Workyears and Contract \$ in 3 Programs

	<u>Workyear</u> <u>%</u>	<u>Contract \$</u> <u>%</u>
Air	10	5
Hazardous Waste	10	36
Water	16	5

Each of the three programs has a somewhat different distribution of resources between Headquarters and Regional offices. Table 10 shows this data for the three programs.

Table 10: Comparison of Headquarters/Regional % By Program

	<u>Headquarters</u> <u>%</u>	<u>Regional</u> <u>%</u>
Air	56	44
Hazardous Waste	34	66
Water	31	69

^{5/}The Regional reports on the workyears associated with these three programs also contain work associated with the radiation and pesticides programs, which have small Regional components. Because of inconsistencies in Regional organizations, these workyears were not all reported consistently, though radiation workyears were most commonly reported with the air resources, while pesticides workyears were most commonly reported with hazardous waste resources. The levels of workyears involved in any event are so small that they have no appreciable effect on the overall totals.

Table 11 compares the workyear percentages which each of the three programs reported for each of the seven major categories of activity. This comparison is further broken down in Table 12, which shows the relative percentages for each of the 23 activities. These data represent a summary of all of the percentages reported by both Headquarters and Regional components of each program.

There are some striking differences among the three programs. The air program, for example, devotes a substantially larger percentage of its resources to standard-setting (a function primarily performed in Headquarters) than either of the other two programs. On the other hand, the water and hazardous waste programs do substantially more permitting and review (functions which are primarily Regional) than does air. To contrast another area, compliance and enforcement activities are a substantially larger percentage of air and hazardous waste activities than is the case in the water program.

It is unclear just what these different patterns signify. One possibility is that they reflect the need for different approaches to solving environmental problems in the air, water, and land. Whatever the cause, it is important to understand that the distribution of activities among the various program areas are quite distinctly different.

Table 11: Program Workyear Breakdown by Category^{6/}

	WORKYEAR %		
	AIR	HAZARDOUS WASTE	WATER
Direct Program Administration	28	51	35
Technical Support	10	8	13
State Program Approval and Oversight	19	15	21
Research	3	0	1
Standard-Setting	20	8	10
Management Support	13	12	12
National Information Collection	7	6	8

^{6/}"Research" workyears and contract dollars for each program include program office workyears and funds only and do not include resources devoted by ORD to air, water, and hazardous waste research.

Table 12: Program Workyear Breakdown by Activity

	WORKYEAR %		
	AIR	HAZARDOUS WASTE	WATER
I. DIRECT PROGRAM ADMINISTRATION			
A. Permitting and Reviews	4	14	14
B. Product Registration	3	1	0
C. Hazardous Substance Response	0	9	0
D. Compliance and Enforcement	17	17	10
E. Program Direction	4	11	10
II. TECHNICAL SUPPORT			
A. Laboratory Services	3	1	1
B. Implementation Tools	3	1	3
C. Direct Assistance	2	5	4
D. Special Projects	1	1	2
E. Training	1	1	3
III. STATE PROGRAM APPROVAL AND OVERSIGHT			
A. Review of Plans/Applications	8	9	7
B. Review of Individual Actions	4	2	6
C. Program Reviews	7	4	9
IV. RESEARCH			
A. Standard-Setting Support	3	0	1
B. Exploratory Research	0	0	0
V. STANDARD-SETTING			
A. Listing Decisions	2	2	0
B. Technical Regulations	17	5	7
C. Administrative Regulations	2	1	3
VI. MANAGEMENT SUPPORT			
A. Policy Activities	5	6	7
B. Administration/Support	8	5	5
C. Legal Defense	1	0	0
VII. NATIONAL INFORMATION COLLECTION			
A. Formal Systems	5	4	4
B. Special Requests	2	3	4

The use to which the various programs put contract dollars can be compared using a similar analysis. About 46% of EPA's total contract dollars are spent in the air, hazardous waste and water programs. Over three-fourths of this is spent in the hazardous waste area, reflecting the activities conducted under "Superfund."

Table 13 contains a breakdown of how each program spends its contract dollars. There are larger differences in contract dollar percentages than in workyear percentages. For example, in addition to the obvious difference in the hazardous waste area because of Superfund, there are also significant differences in the use of

contract funds for compliance and enforcement activities, permitting and reviews, and technical regulations.

Some caution should be used in interpreting the "hazardous waste" percentages. Because the "Superfund" program is so large, it makes the percentages for all other activities in the hazardous waste program seem small even though they may be comparable in absolute terms to similar activities in the air and water programs. For this reason, two columns are shown for the hazardous waste program, one which includes contract funds for emergency response actions and one excludes those funds from the base level used to calculate the percentages.

TABLE 13: Program Contract Dollars by Activity

	CONTRACT DOLLAR \$			
	AIR	HAZARDOUS WASTE1	WASTE2	WATER
I. DIRECT PROGRAM ADMINISTRATION				
A. Permitting and Reviews	0	1	2	19
B. Product Registration	0	0	0	0
C. Hazardous Substance Response	0	60	---	3
D. Compliance and Enforcement	28	5	12	2
E. Program Direction	0	1	2	7
II. TECHNICAL SUPPORT				
A. Laboratory Services	1	8	20	4
B. Implementation Tools	3	3	8	6
C. Direct Assistance	0	1	3	1
D. Special Projects	1	0	0	2
E. Training	5	1	2	1
III. STATE PROGRAM APPROVAL AND OVERSIGHT				
A. Review of Plans/Applications	1	0	0	0
B. Review of Individual Actions	0	0	0	1
C. Program Reviews	0	0	0	0
IV. RESEARCH				
A. Standard-Setting Support	7	3	8	2
B. Exploratory Research	0	0	0	0
V. STANDARD-SETTING				
A. Listing Decisions	1	1	2	0
B. Technical Regulations	50	4	10	34
C. Administrative Regulations	2	0	0	1
VI. MANAGEMENT SUPPORT				
A. Policy Activities	0	3	7	8
B. Administration/Support	0	8	20	0
C. Legal Defense	0	0	0	0
VII. NATIONAL INFORMATION COLLECTION				
A. Formal Systems	0	1	2	9
B. Special Requests	0	1	2	1