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FINANCIAL MANAGEMENT RESPONSIBILITIES OF EPA PROGRAM STAFF: REVIEW OF CONTRACTOR FINANCIAL REPORTS AND ONGOING MONITORING (Fourth in a Series)

This article continues a series on financial management responsibilities under Superfund cost-reimbursement contracts that was initiated in the December 1988 edition (Number 2) of the CORAS Bulletin. The first article presented an overview of the various responsibilities, the key players, and the various Superfund cost-reimbursement contracts. Each of the subsequent articles discussed, in more detail, the major areas of responsibility. The second article, which was published in the May 1989 edition (Number 4), presented a discussion of the review and certification of invoices. The third article, published in the September 1989 edition (Number 5), addressed evaluation of contractor work plans. This article, the fourth in the series, focuses on the review of contractor financial reports and ongoing monitoring of contractor financial performance.

The financial management responsibilities that are presented in this series of articles relate to Superfund cost-reimbursement contracts such as Remedial Planning (REM), Field Investigation Team (FIT), Technical Assistance Team (TAT), Alternative Remedial Contract Strategy (ARCS), Environmental Services Assistance Team (ESAT) contracts and Management Support Contracts. The program staff responsible for oversight of these contracts include the Project Officer (PO), the Deputy Project Officer/Regional Project Officer (DPO/RPO), and the Work Assignment Manager. For the purpose of this article, the term "contract monitor" will be used to refer to these program staff as they share responsibility for financial monitoring and contract oversight.

Responsibility for Monitoring Contractor Financial Performance

It is the responsibility of all Federal employees to monitor efforts of contractors to prevent waste of public funds and to obtain the required contractor services in the most efficient manner and within the amount budgeted. Cost-reimbursement type contracts require a great degree of financial oversight since the contractor has less incentive to control costs than under fixed price contracts. Under cost-type contracts, the contractor is generally entitled to compensation for costs incurred in doing the work, provided costs are 'allowable,' 'allocable,' and 'reasonable.' If cost overruns occur and the government has been aware of the situation through monthly reports or invoices and does not take action or is silent, the government may be deemed as encouraging the work and therefore obligated for reimbursing the contractor for the additional costs. **Therefore, it is critical on all cost-reimbursement contracts that the contract monitors regularly review the financial progress of the contract and identify any problems to the Contracting Officer (CO).**

Review of the financial progress of contractor efforts has become particularly important in the Superfund program as a result of the expansion of the fund that occurred under SARA, the decentralization of contract management responsibilities from Headquarters to the Regional offices, the increased external oversight, and the continuing impor-

tance of cost recovery efforts. Each Superfund PO is responsible for reviewing the monthly financial reports and identifying any problems to the CO. The work assignment manager is responsible for reviewing financial progress at the work assignment level through review of work assignment-specific invoices, technical and financial progress reports submitted by the contractor, and reporting any problems to the PO.

A common misconception of program staff is that financial review is not important because auditors will review the contract costs and identify any problems. Although an audit will be conducted, auditors can only identify costs that are not "allowable" or "allocable" under the contract; they do not have the knowledge to identify or question the "reasonableness" of the costs. Only the contract monitors can evaluate the costs in relationship to the technical progress of the assignment and thus determining the reasonableness of the costs. In addition, identification of problems concerning increasing costs or depletion of resources can be accomplished best by the contract monitor who is most knowledgeable about the technical requirements of the assignment and the reasonableness of costs required to efficiently perform the work.

To monitor contractor financial performance adequately, the contract monitor should use both the contractor invoice and monthly progress reports. The second article in this series provided a discussion on review and certification of contractor invoices. Many of the evaluation considerations presented in that article and the accompanying exhibit, "Checklist for Voucher Review", are also relevant to review of progress reports. This article, however, will focus specifically on use of the financial information provided in monthly progress reports to assist in evaluating contractor financial performance.

Content of Monthly Progress Reports

Under cost-type contracts, the contractor is required to submit monthly technical and financial progress reports. Superfund cost-reimbursement contracts are typically term form (level of effort) contracts. In accordance with the EPA Acquisition Regulation, progress reports under these contracts must provide specific information concerning contract financial status including:

1. actual costs and direct labor hours expended during the current reporting month,
2. cumulative costs and direct labor hours expended from the effective date of the contract through the last day of the current reporting month,
3. estimated costs and direct labor hours to be expended during the next reporting period,

4. average cumulative incurred cost per direct labor hour compared to average cost per direct labor hour derived from the estimated cost of the contract, and
5. actual costs and direct labor hours incurred for each work assignment issued and estimates of costs and staff hours required to complete each work assignment.

Additional reporting requirements may be specified in the contract. Within these requirements, considerable flexibility exists in the format and content of the monthly reports. The contract monitor may request a specific format or more detailed information; however, if this requires additional effort on the part of the contractor to produce the report, there may be an additional cost to the government. The contract monitor should weigh the value of the additional information against the cost of obtaining that information before requesting the information from the contractor. **The monitor must request the minimum reporting information necessary to adequately determine the reasonableness of costs.** The contract monitor should work with or through the CO to be sure that the requested information is within the scope of the contract.

The first step in reviewing the financial reports is to become familiar with the specific format and contents of the report, including understanding how the different costs are reported. Different contracts will vary as to what makes up the costs under different cost categories and how the various costs relate. For example, on one contract costs for photocopying may be included in other direct costs while on other contracts these costs may be included in G&A or indirect costs. An understanding of how costs are reported may be obtained by reviewing the contract requirements and by contacting the CO for assistance in determining this information.

Review of Monthly Progress Reports

Once the contract monitor understands the content of the reports, the monitor has several tools that allow comparison and evaluation of the costs. These include:

1. contractor invoices;
2. technical progress reports;
3. previous monthly financial reports;
4. previous monthly financial reports projections;
5. estimated costs provided in the technical direction documents (TDD), technical information documents (TIDS), or work plans; and

6. knowledge of comparative or similar costs.

The contract monitor should use all of the tools available to review and evaluate the financial performance of the contractor. Once the contract monitor is familiar with the format of the reports and the various tools available on his or her assignment, identification of potential problems will not require a significant amount of the contract monitor's time each month.

When the contractor invoices on a monthly basis, the period covered by requests for contract financing payments (invoices) must be the same as the period for monthly progress reports required under the contract. If the contractor submits invoices more frequently than monthly, one invoice each month must have the same ending period of performance as the monthly progress report. **Where the cumulative amount on the monthly progress reports differs from the aggregate amount per the invoice covering the same period, the contractor must provide a reconciliation of the difference as part of the payment request (invoice).** Do not hesitate to ask your contractor for explanations.

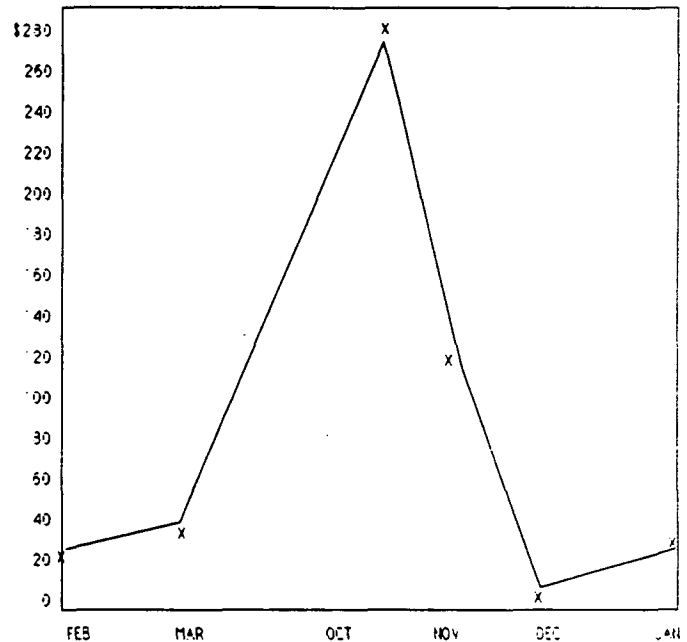
The financial reports should also be evaluated in relation to technical accomplishments on the contract. The technical progress during the reporting period should be described in detail in the technical section of the monthly progress reports. Based on the financial data provided in the progress report, the work assignment manager can compare the actual costs and direct labor hours incurred to the estimates required to complete the assignment. This comparison will provide an idea of the financial progress of the assignment in relationship to the percentage of technical completion, highlighting situations where resources may be depleted before technical completion.

Review of the costs in relationship to technical progress will also help identify any costs which do not appear to be supported by technical accomplishments during the current or any previous reporting period. For example, if the contractor reported expenditures for laboratory services but no laboratory samples had been taken according to the technical reports, the contract monitor should question these costs. Due to the fact that financial reports may only include expenditures that have been invoiced and subcontractor costs that have been billed, costs resulting from the technical accomplishments may not appear in the same monthly report as the related technical activities. However, reporting of the expenditures may lag behind the reporting of the technical activities, not vice versa. When any doubt exists, ask your contractor for an explanation.

Monthly expenditures can also be compared against those reported in previous monthly financial reports. This will help identify any major fluctuations in costs. When the contract monitor identifies fluctuations, he or she must then determine why the costs are out of line. The contract monitor

must first understand and consider fluctuations which result from different stages in the life cycle of the contract, i.e., startup, ongoing or termination (see example below). Once these variations are considered, the contract monitor should review any circumstances that would cause deviations such as variations in billing cycles or late invoices from subcontractors. If the contract monitor cannot identify the cause of the fluctuation or the fluctuation does not seem justified, the problem should be discussed with the PO or the CO.

Monthly ODC\$ = ODC per Labor Hours
LOE



One of the most important tools for reviewing financial progress is the estimate of resources required under the contract or work assignment. Depending on the type of contract, estimates of labor hours and costs may be provided in the individual work assignment, the TDD, the TID, or the work plan. These estimates should be used to compare actual expenditures of resources against projected expenditures. Actual expenditures under each cost category should be compared to the budget for that cost category. This will identify excess expenditures in specific categories, such as other direct costs or equipment, which might warrant further investigation. Since some of these costs may be small in comparison to other costs, it may be easy to overlook them. This is particularly true when the contractor submits a long list of equipment purchases such as often occurs during the start-up phase of a contract. These costs, however, may add up to substantial amounts over the term of the contract and should be reviewed thoroughly.

Estimates of labor hours required should also be compared to actual hours expended. Based on the data required in the monthly report, the PO can compare the average cost per labor hour for the contract against the estimated cost per labor hour. This will highlight situations where higher labor categories are being used than planned and will identify potential depletion of funding before hours are expended. Although the monthly reports may not provide this information on a work assignment basis, the work assignment manager can perform this comparison by simply calculating the estimated and actual average cost per labor hour.

Corrective Actions

The contract monitor should not hesitate to request additional information from the contractor if he does not understand any of the costs. Requests for additional information may involve changes to the monthly reports or simply an explanation of specific expenditures or a request for back-up documentation to support the costs. All requests for additional information should be coordinated with the PO.

The contract monitor may identify several types of problems which require corrective actions, including:

1. unauthorized premium overtime,
2. inefficient use of contractor resources,
3. minor growth trends in expenditures,
4. premature depletion of contract resources, and
5. unnecessary travel or equipment.

The type of corrective action required depends on the severity of the problem. Potential problems and the actions required to correct each are illustrated in the exhibit following this article. As soon as the contract monitor identifies a potential problem, he or she should notify the PO and the CO.

If the contract monitor believes that the contractor is spending more than is reasonably required to accomplish certain portions of the work, the PO should request an explanation or more backup from the contractor and can suspend payment of the amount in question, if warranted. After reviewing additional information, if the contract monitor believes there is a general problem with the expenditures, he might be able to identify potential opportunities to correct the problem, including improvements in the effectiveness and efficiency of the contractor's efforts. The contract monitor should attempt to persuade the contractor to adopt these changes. Remember, expert contractors will always have

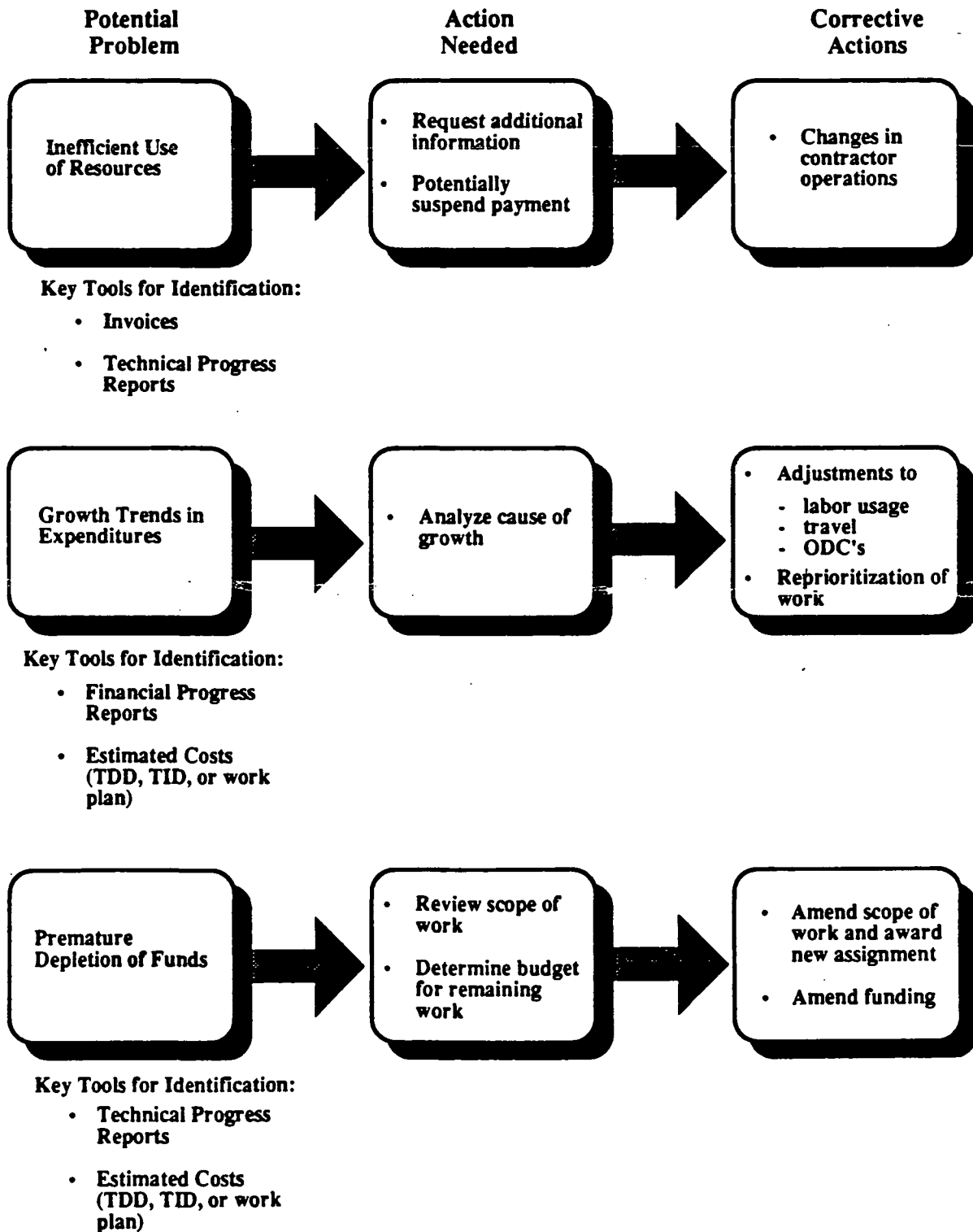
an explanation for everything. It is your job to be perceptive and to look for smoke. Keep asking "Why" until the smoke clears. An example of this situation might be if a contractor was expending considerable labor resources but not able to complete tasks according to schedule. Further review of monthly financial progress reports and additional information requested from the contractor might highlight an inefficient or inappropriate use of labor. This might indicate a potential lack of expertise required to complete the work.

If corrective actions will not prevent funding depletion before the end of the work assignment, the contract monitor should review the scope of the work assignment and determine the need for additional funding. A potential solution might be to amend the scope of work under the work assignment to match remaining funds. However, unless the work is no longer required, this would necessitate a new work assignment as well as additional funding to complete the work. An alternative solution would be to determine the funding needed to complete the work and amend the existing work assignment to add funds. In order to determine the funding needed, the contract monitor should develop a budget for the remaining work. This can be accomplished using the same techniques as used to develop the original budget. Techniques for this will be discussed in a future article. The contract monitor should ensure that problems with funding depletion are identified as early as possible. Contracting activities require considerable lead-time, particularly if a new work assignment must be awarded. This may have significant impact on the ability to complete the work within the established schedule.

Cost-reimbursement contracts generally contain a clause that requires the contractor to notify the CO when costs are expected to exceed the contract amount within 60 days or when the total cost of performance will exceed or be substantially less than estimated. Although this requirement exists, the contract monitor should not rely on this notification to identify problems with funds depletion. The notification may not be required at the work assignment level and therefore, will only help identify problems with the contract as a whole. Additionally, the 60-day notification may not provide sufficient time to take corrective action.

The most important thing to remember in reviewing financial performance of contracts is that it is the responsibility of the contract monitor to identify any problems and to work with the PO and CO to take corrective action as soon as possible. This will prevent waste of public funds and ensure that EPA obtains the necessary contractor services within the required parameters.

CONTRACTOR FINANCIAL MONITORING



UPDATE ON THE LONG TERM CONTRACTING STRATEGY FOR SUPERFUND

The Task Force developed a final recommended strategy in August. The Deputy Assistant Administrator was briefed on August 30, and the Assistant Administrator signed the final document on September 9. The strategy provides a design for the portfolio of Superfund contracts over the next ten years.

The Strategy is built on several key principles. It supports the integration of fund and enforcement-lead activities and enhances competition by creating smaller contracts. The strategy also provides mechanisms for greater flexibility, improved oversight and cost management and giving Regions full responsibility for the majority of the new contracts.

A press advisory and Commerce Business Daily notice have been published on the strategy. CORAS has briefed HWAC, the Office of the Inspection General, the General Accounting Office, and staff of the Senate and the House of Representatives.

An implementation framework was approved by OERR, PCMD and OWPE and was issued on December 18, 1990. Memos requesting appointment of: Designated Leads for Contract Components; Members of the Advisory Committee to review implementation plans and oversee implementation; and Regional Liaisons to oversee Regional implementation efforts, have been sent to the effected entities. A meeting of the Advisory Committee will be scheduled at the end of January or the beginning of February.

For additional questions or information regarding the Long Term Contracting Strategy, call Linda Garczynski on 475-7273.

CONTRACT RELATED MEETINGS, CONFERENCES, AND TRAINING

Title	Date	Location	Contact
FIT Site Assessment Conference*	Jan 13-15, 1991	Santa Fe, NM	David Cook FTS 475-8106
2nd Annual CORAS Conference	Jan 15-17, 1991	Santa Fe, NM	Kay Waters FTS 245-4025
ERCS DPO/CO Conference ARCS PO/CO Conference	Feb 25-28, 1991 Feb 27-Mar 1, 1991	Atlanta, GA Marriott-Marquis	Patricia Tidwell (RRCS) FTS 382-2688 Doretha Vaughn (PCMD) FTS 475-8233 Scott Fredericks (ARCS) FTS 308-8346
Design & Construction Issues at Hazardous Waste Sites	May 01-03, 1991	Dallas, TX	Scott Fredericks FTS 308-8346

If you are interested in receiving back issues of the CORAS Bulletin, please call Jalaria Ellis, FTS 475-8533 or EMAIL5488.

Please note that EMAIL numbers have been added to the "Key Regional Personnel in Superfund Contract Management" chart. If yours is not on it please notify Jalaria.

CORAS BULLETIN BOARD

HAZARDOUS SITE EVALUATION DIVISION

The Site Assessment Branch will hold its National Site Assessment Conference during the week of January 14, 1991, in Santa Fe, NM.

Development of guidance for implementation of the FIT/ARCS contract strategy has begun. Regional and Headquarters contacts for this effort are attached.

For additional information regarding the FIT/ARCS contract strategy, please contact John Hollister on 475-9748.

PROCUREMENT & CONTRACTS MANAGEMENT DIVISION

ARCS AWARD FEE EVALUATION PERIOD EXTENDED

Bill Topping, Chief of the Remedial Action Branch and Fee Determination Official for the 45 ARCS contracts, agreed to the extension of the ARCS award fee evaluation period from 4 months to 6 months. Bill responded to a recommendation submitted by the Remedial Award Fee Task Force (RAFT) which had evaluated the initiative and determined that converting to a semester period for ARCS award fee would offer a considerable reduction in administrative effort involved in the award fee process without reducing its effectiveness as an incentive to superior contractor performance. Bill noted that significant improvement in the quality and timeliness of the award fee process had added additional merit to the RAFT recommendation. Regional contracting offices are currently implementing the change which will be effective with the evaluation semester which began November 1.

For additional information, please contact Ann Hamann on 382-6289.

FIT/ARCS ADMINISTRATION SUBWORKGROUPS

Equipment

<u>Name</u>	<u>Region</u>	<u>FTS Phone #</u>	<u>FTS FAX #</u>	<u>Email #</u>
Gail Nabasny	5 (FIT RPO)	353-1056	353-6775	
Karen Flournoy	7 (S.A Chief)	276-7782	276-7063	EPA 9722
John Hollister	HQ (FIT PO)	475-9748	252-0524	EPA 5083

Invoicing

Nancy Barmakian	1 (ARCS PO)	833-1719	833-1662	EPA 9170
Ann L. Hamann	HQ (PCMD ARCS)	382-6289	245-3880	EPA 30228
John Hollister	HQ (FIT PO)	475-9748	252-0524	EPA 5083

Program Management

Don Smith	1 (FIT RPO)	833-1648	833-1662	
Gail Nabasny	5 (FIT RPO)	353-1056	353-6775	
Karen Flournoy	7 (S.A Chief)	276-7782	276-7063	EPA 9722
Joanne Labaw	10 (ARCS PO)	399-2594	399-0124	EPA 9069
Ann L. Hamann	HQ (PCMD ARCS)	382-6289	245-3880	EPA 30228

Award Fee Plan

Keith Mills	4 (ARCS PO)	257-7297	257-5206	
Steve Nathan	5 (ARCS PO)	886-5496	353-6775	EPA 95019
Pat Bamford	5 (ARCS CO)	886-2400	353-1879	EPA 9543
Doug Frazer	9 (FIT RPO)	484-2338	484-1917	
John Comstock	HQ (CORAS)	245-4026	245-3847	EPA 5484

Tracking and Reporting

John Hollister	HQ (FIT PO)	475-9748	252-0524	EPA 5083
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Work Distribution

Nancy Barmakian	1 (ARCS PO)	833-1719	833-1662	EPA 9170
Fran Harrell	4 (FIT PRO)	257-2930	257-4464	EPA94005
Doug Frazer	9 (FIT RPO)	484-2338	484-1917	
Ann L. Hamann	HQ (PCMD ARCS)	382-6289	245-3880	EPA 30228
Scott Fredericks	HQ (ARCS Chief)	398-8346	308-8350	EPA 5487

FIT/ARCS ADMINISTRATION WORKGROUP

<u>Name</u>	<u>Region</u>	<u>FTS Phone #</u>	<u>FTS FAX #</u>	<u>Email #</u>
Nancy Barmakian	1 (ARCS PO)	833-1719	833-1662	EPA 9170
Don Smith	1 (FIT RPO)	833-1648	833-1662	
Ben Connetta	2 (SAM)	264-6696	264-6192	
Amy Brochu	2 (FIT RPO)	340-6802	340-6622	
Fran Harrell	4 (FIT PRO)	257-2930	257-4464	EPA 94005
Keith Mills	4 (ARCS PO)	257-7297	257-5206	
Steve Nathan	5 (FIT RPO)	353-1056	353-6775	
Gail Nabasny	5 (FIT RPO)	353-1056	353-6775	
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Karen Flournoy	7 (S.A Chief)	276-7782	276-7063	EPA 9722
Doug Frazer	9 (FIT RPO)	484-2338	484-1796	
Joanne Labaw	10 (ARCS PO)	399-2594	399-0124	EPA 9069
Ann L. Hamann	HQ (PCMD ARCS)	382-6289	245-3880	EPA 30228
Tom Sharpe	HQ (PCMD FIT)	475-8746	245-3880	
John Hollister (chair)	HQ (FIT PO)	475-9748	252-0524	EPA 5083
Scott Fredericks	HQ (ARCS Chief)	398-8346	308-8350	EPA 5487
John Comstock	HQ (CORAS)	245-4026	245-3847	EPA 5484

Alternates:

Debbie Morrey	7 (ARCS PO)	276-7782	276-7063
Sheila Kelly	HQ (PCMD ARCS)	382-3200	245-3880

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Linda Martin (chair)	5 (SAM)	353-9486	312-886-7160
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Gerry Snyder	8 (FIT RPO)	330-7540	330-1647
Dave Cook	HQ (FIT PO)	475-8106	252-0524

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Mario Villamarzo	4 (SAM)	257-5065	257-3035
Bill Messenger (co-chr)	5 (SAM)	353-1057	886-7160
Paul LaCourreya	9 (SAM)	484-2345	848-1078
Debbie Flood (co-chr)	10 (SAM)	399-2722	399-0175
Steve Caldwell	HQ (SA Chief)	475-8195	252-0524

KEY REGIONAL PERSONNEL IN SUPERFUND CONTRACT MANAGEMENT

Contract	Headquarters (PO, DPO if possible)	Region 1	Region 2	Region 3	Region 4
REM	REM I - Tracy Loy, EMAIL5201 REM II - Benjamin Hamm, EMAIL5513 REM III - REM IV - Chris Watling, EMAIL REM V - Chris Watling, EMAIL5209	Nancy Barmakian U.S. EPA - HCP - CAN 7 JFK Federal Building Boston, MA 02203 833-5797 EMAIL9170	Shaheer Alvi U.S. EPA 26 Federal Plaza New York, NY 10278 264-2221 EMAIL9202	James McKenzie U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-3229 EMAIL9303	Ken Myer U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL
ARCS	Scott Fredericks, EMAIL5487	Nancy Barmakian/ Diane Kelly U.S. EPA - HCP - CAN 7 JFK Federal Building Boston, MA 02203 833-5797 EMAIL9170	Shaheer Alvi/ Jill Hacker U.S. EPA 26 Federal Plaza New York, NY 10278 264-2221 EMAIL9202	Jerome Curtin/ Jim McKenzie U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-3229 EMAIL3036	Matt Robins U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL9428
ERCS	Zone 1 - Patricia Tidwell, EMAIL5511 Zone 2 - Reg 4 is PO Zone 3 - Reg 5 is PO Zone 4 - Tim Grier, EMAIL30021	John Carlson U.S. EPA 60 Westview Street Lexington, MA 02173 (617)860-4513 EMAIL	Norm Vogelsang U.S. EPA Woodbridge Avenue Edison, NJ 08837 342-4346 EMAIL	Rich Felzer U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-1395 EMAIL	Carol Monell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL9490
TAT	Zone 1 - Pat Hawkins, EMAIL5511 Zone 2 - Karen Tomimatsu, EMAIL30026	John Carlson U.S. EPA 60 Westview Street Lexington, MA 02173 (617)860-4513 EMAIL	Norm Vogelsang U.S. EPA Woodbridge Avenue Edison, NJ 08837 342-4346 EMAIL	Rich Felzer U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-1395 EMAIL9324	Carol Monell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL9490
FIT	Zone 1 - John Hollister, EMAIL5083 Zone 2 - Dave Cook, EMAIL5080	Don Smith U.S. EPA - HSS - CAN 7 JFK Federal Building Boston, MA 02203 833-1648 EMAIL	Amy Brochu U.S. EPA Woodbridge Avenue Edison, NJ 08837 340-6802 EMAIL	Greg Hamm U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-8229 EMAIL	Fran Harrell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL
TES	Zone 1 - Jack Jojokian, EMAIL Zone 2 - Jean Wright, EMAIL Zone 3 - Marlene Lemro, EMAIL Zone 4 - Nancy Deck, EMAIL	Rick Leighton U.S. EPA - CAN 7 JFK Federal Building Boston, MA 02203 833-1654 EMAIL9156	Cathy Moyik U.S. EPA 26 Federal Plaza New York, NY 10278 264-8123 EMAIL9206	Elaine Spiewak/ Nancy Cippola U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-8183 EMAIL	Ken Myer U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930 EMAIL
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KEY REGIONAL PERSONNEL IN SUPERFUND CONTRACT MANAGEMENT

Contract	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10
REM	Gail Nabasny U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-1056 EMAIL	Helen Newman U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720 EMAIL	Karen Flournoy U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-7782 EMAIL9722	Gregg Hargreaves U.S. EPA 999 18th Street Denver, CO 80202 330-1287 EMAIL9832	Rob Stern U.S. EPA 75 Hawthorne Street San Francisco, CA 94103 484-2339 EMAIL99039	Joanne LaBaw U.S. EPA 1200 6th Street Seattle, WA 98101 399-2594 EMAIL9041
ARCS	Steven Nathan/ Pat Vogtman/Carl Norman U.S. EPA 230 South Dearborn St. Chicago, IL 60604 886-5496 EMAIL95019	Carlene Chambers/ Eve Bass U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720 EMAIL9698	Debi Marey U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276- EMAIL	Jeff Mashburn U.S. EPA 999 18th Street Denver, CO 80202 330-7156 EMAIL	Rob Stern/ Matt Mitguard/Sherry Nikzat U.S. EPA 75 Hawthorne Street San Francisco, CA 94103 484-1440 EMAIL99078	Joanne LaBaw U.S. EPA 1200 6th Street Seattle, WA 98101 399-2594 EMAIL9041
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