



CORAS Bulletin

Office of Emergency and Remedial Response
Office of Program Management OS-240

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We would like to take this time to thank the Contracts Management Division, Research Triangle Park for the following article on Personal Services.

Personal Services

The Government is normally required to obtain its employees by direct hire under competitive appointment or other procedures required by civil service laws. Obtaining personal services by contract, rather than by direct hire, circumvents those laws unless Congress has specifically authorized acquisition of the services by contract. Work performed by our dedicated team contractors (TAT, FIT and ESAT) are particularly susceptible to developing into or being managed as personal service contracts. Personal services contract means a contract that, by its express terms, or as ADMINISTERED, makes the contractor personnel appear, in effect, to be Government employees.

The major test of whether or not a personal services contract exists is whether or not the relationship between the contractor and the Government can be characterized as an employee/employer relationship. An employee/employer relationship exists when either by the terms of the contract itself, or **BECAUSE OF THE MANNER IN WHICH THE CONTRACT IS MANAGED**, contractor personnel are subject to the day-to-day supervision and control of Government personnel.

The Federal Acquisition Regulation (FAR) provides descriptive elements which should be used as a guide in assessing whether or not a contract is a personal services contract.

These elements are:

1. Performance on site.
2. Principal tools and equipment furnished by the Government.
3. Services are applied directly to the integral effort of the Agency or an organizational subpart in furtherance of assigned function or mission.

4. Comparable services, meeting comparable needs, are performed in the same or similar manner using civil service personnel.
5. The need for the type of service provided can reasonably be expected to last beyond one year.
6. The inherent nature of the services, or the manner in which it is provided reasonably requires (directly or indirectly) Government direction or supervision of contractor employees to:
 - (i) Adequately protect the Government's interest;
 - (ii) Retain control of the function involved; or
 - (iii) retain full personal responsibility for the function supported in a duly authorized Federal officer or employee.

The existence of one or more of the first five elements does not necessarily indicate a personal services contract. These elements highlight areas where potential problems could arise. The sixth element, however, gets to the heart of the concept of personal services. If, in order to protect the government's interests, it is necessary for government employees to directly supervise contractor employees, it is likely that those employees are providing personal services. The first five elements are present to varying degrees in some of our contracts and there is very little that can be done to lessen their presence. Maximum effort must be exerted in relation to the sixth element to ensure that we do not cross the line.

The sixth element pertains to supervision and control. Compliance with the following guidelines will lessen the chances that a reviewer could conclude that the sixth

element is present. They are important because each such piece of circumstantial evidence may contribute to a later conclusion that the services are personal.

-- Let the contract, TID, TDD, or work assignment define the job. These documents must provide a detailed description of the job to be done and the finished product to be delivered. It is not enough to write something like, "furnish such assistance as is or may be necessary to support the overall mission of the activity," or "perform document review for 16 documents in accordance with oral instructions." The TID, TDD, or work assignment should adequately describe the job to be done so that further informal direction is unnecessary. Further formal direction via amendment or modification is permissible.

-- EPA employees generally cannot instruct, supervise, or control a contractor's employee in how he performs his work. When the job definition requires interpretation of the work description, the direction should be issued from the Deputy Project Officer (DPO) to the team manager, preferably in writing. Generally (except in emergency situations) oral or written instructions given deliberately to individual contractor employees should be avoided.

-- All requests for contractor follow-up or touch-up services should be directed from the DPO to the team

manager. Likewise, contractor employees should operate through the team manager to obtain any information needed to complete the work product.

-- Strictly avoid intervention with respect to the hiring or firing of contractor employees. EPA personnel should not participate in any manner in the interviewing of prospective employees.

-- Strictly avoid intervention with respect to the assigning of particular employees to specific tasks.

-- Strictly avoid situations in which the contractor provides support to another EPA on-site contractor.

-- All EPA occupied space and all contractor occupied space should be readily identifiable. Contractor employees should be physically located in separate areas from EPA employees. In isolated cases where a general area must be occupied or used by both EPA and contractor employees, some sort of physical separation, identification of space, and scheduling of equipment usage should be arranged.

It is imperative that the above guidelines be followed. If they are not, the only conclusion available is that the contracts are for personal services since all six elements would be present including the major test of employee/employer relationship.

CONTRACTOR PERFORMANCE
EVALUATION CRITERIA

One of the recommendations in a recent Inspector General report on Superfund award fee contracts was that consistent procedures should be established in order to provide award fees in a uniform manner. We agree that opportunities exist for a more standardized approach in various aspects of the award fee process. One of these aspects is in the area of ratings and rating definitions. Each of our major programs uses the 1-5 rating system to initially evaluate the performance of the contractors, however, definitions of the individual ratings do not exist in some cases and are inconsistent in others. In an effort to share some improvements in this area, CORAS will periodically publish items brought to our attention that you may find useful. One example is the attached ARCS rating definitions developed by Region IX. We consider this document to be a useful guide that should contribute to uniformity and documentation in the award fee process. It is recommended that ARCS Project Officers in other regions consider this example. While all region definitions may not be identical (as a result of differences in regional perspective, etc.) the fact that all regions have established definitions is a step in the right direction.

If other Regions have developed useful approaches for award fee, please provide examples to CORAS for consideration in future bulletins.

EVALUATION

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SCOPING AND MANAGING THE RI/FS PROJECT BUDGET

A great deal has been written about the design and conduct of RI/FS projects, but relatively little has been developed on the budgeting and financial management associated with carrying out the project. Two methods have been devised to assist the Remedial Project Manager (RPM) in developing an RI/FS project budget, and to evaluate the cost impacts of decisions made during project scoping and preparation of the Workplan.

One method is the use of a small informal workbook as a guide in budgeting the fourteen standard tasks that make up a RI/FS project. This workbook is titled "Scoper's Notes" and contains a series of checklists and tables which present distilled experience data as a range of most likely costs of the various tasks as a function of site complexity. Since the cost and quality of past RI/FS projects have varied widely, the workbook stresses the need for careful planning and management to control project expenditures. The guide addresses the maximum utilization of existing data, careful consideration of the number of water sampling wells to be installed, increased use of on-site sample analysis, etc. as primary cost driving factors.

The presentation used in Scoper's Notes is oriented toward giving the new RPM a starting point to evaluate site complexity and the factors expected to materially affect the level of effort and the resources needed to complete the project. Using this guide, it should be possible to prepare an initial estimate of costs that can be the base against which contractor bids may be evaluated. The data in the workbook must be supplemented with all special site conditions not encountered at conventional waste sites. The level of effort and costs shown in the tables are meant to be starting points for a refinement of the Workplan estimate. Regional factors can be introduced by having the Technical Advisory Committee (TAC) review the estimates prepared and compared to site data and experience gained at similar sites.

The second method is the use of a computer-based model entitled "Superfund Cost Estimating Expert System" (SCEES). Unlike Scoper's Notes, SCEES relies heavily on technically oriented data about the site. To get the most out of a modelling session, the RPM should have prepared in advance a SCEES data questionnaire. Most of the requested information is available from the Hazard Ranking System

(HRS) scoring package. For those cases where the information is not available SCEES includes instructions to help the RPM estimate the correct answer, or the model will provide default data values and conditions. It takes about an hour to step through the modeling exercise.

The model was built using an experience data base developed from a regional REM contractor's data files, expert opinion obtained from experienced RPM's, and workplan reviews. The model output consists of four summary report tables constructed from the data entered and internal algorithms. One table presents a best estimate of the Level-of-Effort (in manhours) and cost for each of the 14 standard tasks included in a RI/FS project. The model will ask for prevailing hourly billing rates for all skill categories or default to nominal 1989 values for calculating labor costs.

A second table presents a Site Data Report which rates the site complexity, estimates the number of media samples, surveys, and tests to be carried out during the Field Investigation Task. The cost of this Task is generally more than half of the total RI/FS cost. The model will list the remedial technologies that are indicated for evaluation. The third table is a Drilling Details Report summarizing the number, casing, depth, and sampling requirements for the wells to be installed. The table presents an estimate of level-of-effort and cost for the drilling program. The ground water sampling well installation program is a high cost item.

The fourth table is an RI/FS Summary Cost Report. This report combines labor, equipment, travel, subcontract costs, etc. that are likely to be required to complete the project. The model will also estimate the CLP costs implied by the number and types of samples planned.

SCEES, like Scoper's Notes, is designed to give the new RPM a starting point for planning and evaluating. It is not designed to be a substitute for hard work or good judgement. The model output should always be analyzed carefully and be reviewed by an experienced RPM to insure the reasonableness of estimates.

For additional information on this topic, please contact Chad Littleton on 475-7294 or Paul Wilkins on 382-2462.

CORAS BULLETIN BOARD

HAZARDOUS SITE CONTROL DIVISION

Dallas' Hilton Hotel has been selected as the location for the upcoming May 1-3, 1991 "Conference on Design and Construction Issues at Hazardous Waste Sites." This conference will provide a forum for the exchange of technical information within and between federal and state agencies, PRP's, and the contracting community. Technical papers will be presented, in conjunction with panel discussions, on policy/technical issues and case studies. Topics will include: Policy for RD/RA Activities; Planning Phase Impacts on Design and Construction; Remedial Design Activities; Remedial Construction Activities; and Post-Construction Activities (Operation and Maintenance, Deletion from NPL, Long term Response Actions.) A call for abstracts was made in September 1990.

PROCUREMENT AND CONTRACTS MANAGEMENT DIVISION

ACT's System Update

As of July 20, 1990, the ARCS Contract Tracking (ACT) System has been installed in each of the regions or zones requesting the system. We expect that regional personnel will spend the next several weeks gathering and entering all of the basic contract information, work assignments, and invoices needed to make the database functional.

By the end of October, ACT's ad-hoc reporting mechanism will be fully operational. This feature will allow users to create and save reports which are not standardized in the system. Early in the next fiscal year, we hope to have the read-only access feature completed, thus allowing system users other than the cognizant Contract Officers and Contract Specialists to view screens without jeopardizing the integrity of the data. A Headquarters ACT component which collates regional data and which will contain HQ-specific reports is also in the planning stage. The HQs component should be ready in early 1991.

Anyone having questions concerning ACT installation or our plans for ACT in the near future should contact Dennis Cunningham of the Superfund Regional Coordination Staff at FTS 475-9479.

PCMD TIDBITS

PCMD, in cooperation with OERR and Office of Small and Disadvantaged Business Utilization (OSDBU), has prepared and submitted a final response to the Inspector General's audit of the ARCS bidding and award process. PCMD and OSDBU have undertaken several initiatives to highlight the responsibilities of our ARCS contractors in making good faith efforts to achieve Small Business/Small Disadvantaged Business Enterprises (SB/SDBE) goals contained in each contract. OSDBU will be undertaking a more aggressive regional role in meeting with Performance Evaluation Boards and regional contracting and program officials to increase awareness of the importance of SB/SDBE plans in the award fee evaluation process.

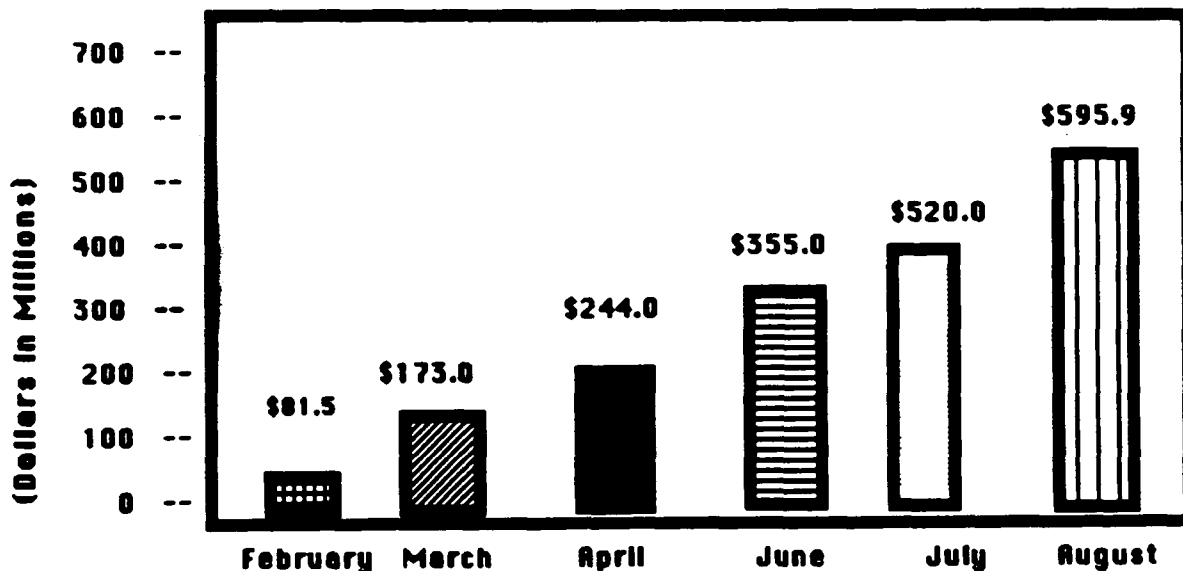
If you are interested in receiving back issues of the CORAS Bulletin, please call Jalaria Ellis, FTS 475-8533.

For changes to the "Key Regional Personnel in Superfund Contract Management" chart, please notify Jalaria Ellis, FTS 475-8533.

CONTRACT RELATED MEETINGS, CONFERENCES, AND TRAINING			
Title	Date	Location	Contact
Removal Managers National OSC Meeting	Oct 30-31, 1990	Washington, DC	Bruce Engelbert FTS 382-2188
CLP Business Meeting	Nov 05-06, 1990	Albuquerque, NM	Pat Wiltshire FTS 382-7943
Superfund Analytical Services Orientation Conference	Nov 07-08, 1990	Albuquerque, MN	Howard Fribush FTS 382-2239
Superfund 1990 HMCRI 11th National Conference and Exhibition	Nov 26-28, 1990	Sheraton Washington Hotel Washington, DC	Carolyn Offutt FTS 308-8320
Annual Procurement Meeting	Nov 28-30, 1990	San Antonio, TX	Susan Sawler FTS 382-6326
FIT Site Assessment Conference*	Jan 13-15, 1991	Santa Fe, NM	David Cook FTS 475-8106
Annual CORAS Conference	Jan 15-17, 1991	Santa Fe, NM	Kay Waters FTS 245-4025
Design & Construction Issues at Hazardous Waste Sites	May 01-03, 1991	Dallas, TX	Scott Fredericks FTS 308-8346

* Tentative schedule

FY 1990 CUMULATIVE SUPERFUND OBLIGATIONS
(extramural only)



Note: May figures are unavailable.

RATING	CONTRACTOR PERFORMANCE EVALUATION CRITERIA	
	PROJECT PLANNING	TECHNICAL COMPETENCE & INNOVATION
OUTSTANDING 5	Always develops workplans with minimum cost/time which were used to base these estimates are explicitly conveyed. Planned vs actual performance does not result in delays or unjustified cost increases. Identifies problems early on and ensures involvement of EPA.	Technical analysis are thorough with no reworks and technically justified recommendations are always submitted. Solutions result in state of art approaches which can be applied to similar environmental problems.
EXCEEDS EXPECTATIONS 4	Always develops workplans with reasonable cost/time estimates. Assumptions which were used to base these estimates are conveyed. Planned vs actual performance does not result in any significant project delays or unjustified cost increases.	Technical analyses are thorough with no reworks and technically justified recommendations are always submitted for all routine types of work as well as for work on more complex projects.
SATISFACTORY 3	Workplans are adequate to address requirements in the SOW with reasonable cost/time estimates for the required level of effort.	Technical analyses are thorough with no reworks and technically justified recommendations are always submitted for all routine type of work.
MARGINAL 2	Workplans do not adequately address all of the requirements in the SOW. Cost/time estimates are disproportionate to the required level of effort.	Technical analyses often are incomplete and require reworks. Recommendations are not always accepted due to an incomplete technical analysis.
UNSATISFACTORY 1	Make incorrect identification in the workplan of the requirements needed to meet the SOW. Inadequate cost/time estimates are made for the required level of effort.	Major elements in the technical analysis are missing and require significant reworks. Recommendations are not accepted due to major deficiencies in the technical analysis.

- Please include an evaluation of the contractor's management of the subcontractor(s) for these categories if an award fee is also given for subcontractor management.

RATING	CONTRACTOR PERFORMANCE EVALUATION CRITERIA	
	SCHEDULE & COST CONTROL	RESOURCE UTILIZATION
OUTSTANDING 5	Tasks are completed ahead or on schedule in spite of impediments, and services are completed below or at budget ensuring that costs are minimized. Government is informed in advance of progress on meeting the schedule and budget.	Contractor consistently utilizes resources in a manner which minimizes cost and time expenditures while utilizing the appropriate professional mix to ensure that the overall work quality remains exceptional.
EXCEEDS EXPECTATIONS 4	Original schedule is met in spite of impediments, and services are completed within budget at minimum costs. Government is informed in advance of progress on meeting the schedule and budget.	Contractor utilizes resources in a manner which minimizes costs and time expenditures, while utilizing the appropriate professional mix to ensure that the overall work quality is acceptable to the Government.
SATISFACTORY 3	Project is completed within schedule and budget. In those cases where slippages occur, adequate justification is provided and prior government approval is obtained. Efforts are taken to ensure that costs are minimized.	Contractor utilizes resources and an appropriate professional mix to meet project and contract requirements.
MARGINAL 2	Original schedule slips without adequate warning or justification, or services are completed at an increased cost to the Government without adequate justification.	One or a few of the contractor resources are not used efficiently resulting in occasional minor cost overruns and time delays.
UNSATISFACTORY 1	Original schedule slips so as to have resulted in delays which negatively impact the project, or services are completed at a significantly increased cost to the Government.	Consistent poor utilization of resources results in significant cost overruns and time delays.

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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 REM II - Benjamin Hamm REM III - REM IV - Chris Watling REM V - Chris Watling	Nancy Barmakian U.S. EPA - HCP - CAN 7 JFK Federal Building Boston, MA 02203 833-5797	Shaheer Alvi U.S. EPA 28 Federal Plaza New York, NY 10278 264-221	James McKenzie U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-3229	Ken Myer U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
ARCS	Scott Fredericks	Nancy Barmakian U.S. EPA - HCP - CAN 7 JFK Federal Building Boston, MA 02203 833-5797	Shaheer Alvi U.S. EPA 28 Federal Plaza New York, NY 10278 264-221	Jerome Curtin U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-4779	Doug Thompson U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
ERCS	Zone 1 - Joan Henry Zone 2 - Reg 4 is PO Zone 3 - Reg 5 is PO Zone 4 - Lisa Guarneri	John Carlson U.S. EPA 60 Westview Street Lexington, MA 02173 (617)860-4513	Norm Vogelsang U.S. EPA Woodbridge Avenue Edison, NJ 08837 340-	Rich Fetzer U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-	Carol Monell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
TAT	Zone 1 - Pat Hawkins Zone 2 - Karen Tomimatsu	John Carlson U.S. EPA 60 Westview Street Lexington, MA 02173 (617)860-4513	Norm Vogelsang U.S. EPA Woodbridge Avenue Edison, NJ 08837 340-	Rich Fetzer U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-	Carol Monell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
FT	Zone 1 - John Hollister Zone 2 - Dave Cook	Don Smith U.S. EPA - HSS - CAN 7 JFK Federal Building Boston, MA 02203 833-1648	Amy Brochu U.S. EPA Woodbridge Avenue Edison, NJ 08837 340-6802	Greg Hamm U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-8229	Fran Harrell U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
TSS	Zone 1 - Jack Jojokian Zone 2 - Jean Wright Zone 3 - Billy Perry Zone 4 - Nancy Deck	Rick Leighton U.S. EPA - CAN 7 JFK Federal Building Boston, MA 02203 833-1654	Cathy Moyik U.S. EPA 28 Federal Plaza New York, NY 10278 264-8123	Elaine Spiewak/ Nancy Cippola U.S. EPA 841 Chestnut Street Philadelphia, PA 19107 597-8183	Ken Myer U.S. EPA 345 Courtland St., NE Atlanta, GA 30365 257-2930
ESAT	Lynn Beasley Zone 1 - Reg. 1,2,3, & 5 Zone 2 - Reg. 4,6,10, & HCs	Scott Clifford U.S. EPA 60 Westview Street Lexington, MA 02173 (617)860-4631	Joseph Hudek U.S. EPA Woodbridge Avenue Edison, NJ 08837 340-6713	Terry Simpson/ Dan Slizys (CRL Actng) U.S. EPA 839 Bestgate Road Annapolis, MD 21401 (301)266-9180	Bobby Carroll U.S. EPA Station Road, ASB Athens, GA 30613 250-3309

KEY REGIONAL PERSONNEL IN SUPERFUND CONTRACT MANAGEMENT

Contract	Region 5	Region 6	Region 7	Region 8	Region 9	Region 10
FEM	Gail Nabasny U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-1056	Helen Newman U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Karen Flournoy U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-7782	Lisa Beasley U.S. EPA 999 18th Street Denver, CO 80202 330-1282	Rob Stern U.S. EPA 75 Hawthorne Street San Francisco, CA 94103 484-2339	Joanne LaBaw U.S. EPA 1200 6th Street Seattle, WA 98101 399-2594
ARCS	Steven Nathan U.S. EPA 230 South Dearborn St. Chicago, IL 60604 886-5496	Carlene Chambers U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Rebecca Thomas U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-7593	Jeff Mashburn U.S. EPA 999 18th Street Denver, CO 80202 330-	Peter Rubenstein U.S. EPA 75 Hawthorne Street San Francisco, CA 94103 484-	Joanne LaBaw U.S. EPA 1200 6th Street Seattle, WA 98101 399-2594
ERCS	Charles Brasher U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-	Chris Peterson U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Ron McCutcheon U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-	Mike Zimmerman U.S. EPA 999 18th Street Denver, CO 80202 330-7134	Chris Weden U.S. EPA 75 Hawthorne Street San Francisco, CA 94103 484-2291	William Longston U.S. EPA 1200 6th Street Seattle, WA 98101 399-1196
TAT	Duane Heston U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-1788	Chris Peterson U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Paul Doherty U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-	Jim Knoy U.S. EPA 999 18th Street Denver, CO 80202 330-7162	William Lewis U.S. EPA - (T-4-8) 75 Hawthorne Street San Francisco, CA 94103 484-2292	Carl Kitz U.S. EPA 1200 6th Street Seattle, WA 98101 399-1263
FTT	Gail Nabasny U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-1056	Ed Sierra U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Peter Culver U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-7707	Gerry Snyder U.S. EPA 999 18th Street Denver, CO 80202 330-7505	Doug Frazer U.S. EPA - (T-4-8) 75 Hawthorne Street San Francisco, CA 94103 484-2338	John Osborn U.S. EPA 1200 6th Street Seattle, WA 98101 399-0837
TEB	Lorraine Kosik U.S. EPA 230 South Dearborn St. Chicago, IL 60604 353-6431	Karen Witten U.S. EPA 1445 Ross Avenue Dallas, TX 75270 255-6720	Maureen Hunt U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 276-7722	Sam Marquez U.S. EPA 999 18th Street Denver, CO 80202 330-7151	Judy Walker U.S. EPA - (T-4-8) 75 Hawthorne Street San Francisco, CA 94103 484-2334	Mike Slater U.S. EPA 1200 6th Street Seattle, WA 98101 399-0455
EBAT	Jay Thakkar U.S. EPA, (5SCRL) 536 South Clark St. Chicago, IL 60605 886-1972	Michael Daggell U.S. EPA 10625 Fallstone Houston, TX 77099 730-2107	Harold Brown U.S. EPA 726 Minnesota Avenue Kansas City, KS 66101 757-3881	Steve Callio U.S. EPA 999 18th Street Denver, CO 80202 330-7509	Terry Stumph U.S. EPA - (P-3) 75 Hawthorne Street San Francisco, CA 94103 484-1534	Gerald Muth U.S. EPA 1200 6th Street Seattle, WA 98101 399-0370