UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 31 1990

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER Directive No. 9230.0-09

MEMORANDUM

SUBJECT: Community Relations: Use of Senior Environmental Employees in Superfund (Superfund Management Review: Recommendation 43.K,L)

FROM: Henry Longest II, Director
Office of Emergency and Remedial Response

TO: Director, Waste Management Division
Regions I, IV, V, VII, VIII
Director, Emergency and Remedial Response Division
Region II
Director, Hazardous Waste Management Division
Regions III, VI, IX
Director, Hazardous Waste Division
Region X

Community Relations Coordinators, Regions I - X

Purpose: To report on the use of SEEs in the Superfund program and to offer guidance on their future use.

Background: The Superfund Management Review (SMR) indicated the need to improve the frequency and consistency of communication with the public. A method suggested in the SMR to help accomplish this goal is to expand Superfund's use of the Senior Environmental Employee (SEE) program.

Established in 1976, the SEE program supplies valuable labor to EPA through sixty-four non-profit senior citizens' associations. Over the years, SEEs have made valuable contributions both to Superfund and to EPA in general. The popularity of the program rests not only in the diverse skills and experience that SEEs bring to our organization, but also in the fact that their employment does not count against full-time employee hiring ceilings.

To arrange for SEE support, EPA program offices submit requests to the Office of Research and Development, which then provides funds for SEE salaries, overhead, and travel. The funds are in the form of a grant that is awarded to one of the associations.

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SEEs in Superfund work mostly within the Technical Assistance Grant (TAG) program. Within the TAG program the SEEs serve a valuable role, engaging in a number of important activities before, during and after the awarding of a grant. Prior to the award of the grant, SEEs distribute TAG application packages to interested groups, process "letters of intent" submitted by citizens' groups, and conduct the formal notification process to advise the public that letters of intent have been received and that a grant has been awarded. During the awarding process, SEEs advise citizens' groups on preparing the grant application, help these groups establish efficient procurement and record keeping systems, and assist groups in negotiating with prospective technical advisors and preparing subagreements with these advisors. After the grant award has been made, SEEs review grant recipient requests for grant agreement modifications, help EPA establish and maintain an official record of activities for the grant, and analyze financial reports, progress reports and other correspondence.

Although the SEE program has been beneficial to the implementation of the TAG program, SEE staff, TAG coordinators, and community relations staff members have identified a few obstacles that prevent the program's full success. Among these impediments are a lack to training provided to the SEEs, absence of clear definition of the SEE's role, and EPA hesitancy to treat SEEs as Agency colleagues. The following section addresses these issues, and also makes a recommendation on expanding the role of SEEs into the community relations program.

Objective: To improve and expand the role of SEEs in the Superfund program.

Implementation: The following four recommendations are aimed at improving the use of SEEs, while increasing their overall role in Superfund.

1) Provide adequate training to SEEs. Regions should make every effort to provide a comprehensive orientation to SEEs. Whether accomplished through established formal training, or through individual instruction, we must take the time to introduce SEEs to the intricacies of EPA, Superfund, and their specific role. SEEs come from a variety of backgrounds and bring to the EPA a wealth of life experience -- tailor their orientation to fit their individual needs.

2) Provide SEEs with clear job descriptions. No Agency-wide definition of the SEE's role exists. Although the positions filled by SEEs are similar in many ways, their responsibilities will vary from Region to Region. Regions are free to tailor the

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responsibilities of a SEE to suit specific programmatic needs. Whatever the SEE's role may be, he or she and EPA should both be aware of the expectations of the position. Create a job description that accurately reflects the role that the Region needs filled by the SEE. Regions may wish to contact other Regions to exchange position descriptions and ideas regarding the role of SEEs.

3) Treat SEEs as if they are Agency colleagues. SEEs are not EPA employees. They do, however, occupy a special undefined ground between contractor and EPA employee. While we might not afford to them all the privileges and responsibilities we extend to our EPA employees, we still should treat them with the courtesy and respect commensurate with their position and experience. Include them in strategy meetings. Listen to their suggestions... Make them feel a part of the team. They are talented, experienced colleagues, providing a valuable service to our program.

4) Broaden SEE roles to include activities other than TAG. Regions are encouraged to expand the use of SEEs, where appropriate. Although the majority of SEEs' work has been within the TAG program, they should not be limited to TAG. The community relations program, in particular, can use SEEs in their outreach efforts. For example, where a site is some distance from an EPA office, Regions can hire a local person at the site to answer questions and distribute information.

SEEs have shown themselves to be valuable assets to our program, and Superfund management is committed to further improvement and expansion of their role in clean-up activities. For more information regarding the use of SEEs in Superfund please contact Melissa Shapiro of my staff at FTS 382-3250 or Jeff Langholz at FTS 382-2460.