



# At a Glance

## Why We Did This Review

We evaluated whether the U.S. Environmental Protection Agency's (EPA's) distribution of Superfund human resources among EPA regions supports the current regional workload.

In the past 21 years, the EPA Office of Inspector General (OIG) and U.S. Government Accountability Office have issued over 10 reports citing the need for the EPA to implement workload analysis into its human resource distributions. In the 1980s, the EPA conducted comprehensive workload analyses to determine appropriate workforce levels and each year, with regional consensus, evaluated need and allocated its human resources accordingly. However, in 1987, the agency chose to no longer redistribute Superfund staff positions across the regions and, as a result, the distribution of full-time equivalent staff was focused on marginal changes.

### This report addresses the following:

- *Cleaning up and revitalizing land.*
- *Operating efficiently and effectively.*

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Listing of [OIG reports](#).

## ***EPA's Distribution of Superfund Human Resources Does Not Support Current Regional Workload***

### What We Found

The distribution of Superfund full-time equivalents (FTEs) among EPA regions does not support current regional workloads. As a result, some regions have had to prioritize work and have slowed down, discontinued or not started cleanup work due to a lack of FTEs, while other regions have not had to resort to such actions. In a survey of EPA regions, in fiscal years 2015 and 2016, six of 10 regions said they were not able to start, or had to discontinue, work due to lack of FTEs.

**Due to insufficient human resources to cover all Superfund site work, some regions have had to slow down or discontinue their efforts to protect human health and the environment.**

The EPA's Superfund program has only marginally changed the FTE distribution in 30 years because it believes redistribution would cause a disruption of work and there is general management unwillingness to redistribute FTEs. Some sites where work has slowed down or been discontinued do not have "human exposure under control" or "groundwater migration under control." Other impacts include loss of subsistence fishing and continued contamination with chemicals such as lead and mercury.

Other federal organizations that perform similar site cleanups demonstrate opportunities for the EPA to align its workload prioritization and FTE distribution according to a national risk-based prioritization structure. For example, two Department of Defense (DoD) organizations—the U.S. Army Corps of Engineers and the Naval Facilities Engineering Command—require, pursuant to DoD regulations, prioritization of sites based on risk and other factors. According to the DoD, funds supporting FTEs are distributed nationwide to the highest prioritized sites.

### Recommendations and Planned Agency Corrective Actions

We recommend that the Assistant Administrator for Land and Emergency Management address past obstacles to resource allocation; review the U.S. Army Corps of Engineers and Naval Facilities Engineering Command workload management and FTE distribution practices to identify those aspects of the process that may be beneficial for the EPA to adopt; implement a national prioritization of all sites (except emergency and time-critical removal actions and federal facilities); regularly distribute regional FTEs according to that prioritization; and obtain relevant data from regions. All recommendations are resolved with agreed-to actions pending.