

GAO

Testimony

Before the Subcommittee on Investigations and Oversight,
Committee on Public Works and Transportation,
House of Representatives

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EPA'S SUPERFUND
TAG PROGRAM

Grants Benefit Citizens
But Administrative Barriers
Remain

Statement for the Record of
Richard L. Hembra, Director
Environmental Protection Issues,
Resources, Community, and Economic Development Division



Mr. Chairman and Members of the Subcommittee:

We are pleased to provide this statement for the record on the Environmental Protection Agency's (EPA) Technical Assistance Grant (TAG) Program. The TAG program provides communities with grants of up to \$50,000 to foster their involvement in decisions about Superfund hazardous waste cleanups. Communities use the grants primarily to hire technical advisors to help them understand the technical aspects of a site cleanup in their area. While various studies have shown that the TAG program has been instrumental in helping communities, concerns have also been raised about administrative barriers that limit the number of communities that receive grants and that keep communities from using the grants effectively.

As requested, my statement today completes our review by addressing communities' experiences with the TAG program. Specifically, you asked us to provide the subcommittee with information on the (1) percentage of potentially eligible communities that have received grants, (2) benefits communities have derived from grants, (3) communities' concerns about the administrative burdens in applying for and using the grants, and (4) issues that merit attention before the Superfund program is reauthorized.

We performed our work at EPA headquarters in Washington, D.C. and obtained information from all 10 EPA regions through structured interviews. We also interviewed a judgmental sample of 15 communities that had received, applied for, or been denied a TAG, and several environmental groups, to obtain their opinion on the benefits of the program and the concerns they had in applying for and using a grant. (See App. I for a list of communities that we contacted.) Our audit work was conducted between June and October of 1992.

RESULTS IN BRIEF

In summary, we found that only a small percentage of potentially eligible communities are participating in the TAG program. Since 1988, EPA has awarded 103 grants totaling \$5.1 million to local communities, which represents 9 percent of the approximately 1,150 communities that are potentially eligible for the program. While it is unclear how many of these communities would meet all the eligibility criteria for a grant, the number of grants awarded still seems disproportionately small when compared to the universe of potentially eligible communities. In addition, the \$5.1 million in grant money represents only 29 percent of the \$17.7 million authorized for the program. We believe that EPA's limited emphasis on TAG program outreach efforts at the headquarters and regional levels may be contributing to the low participation in the program.

Communities that have been awarded TAG grants were generally pleased with the benefits they derived from the grants. All of the TAG grant communities that we contacted were using, or planned to use, the grants to hire technical advisors. These advisors were helping the communities better understand and participate in the cleanup process by performing activities such as reviewing both hazardous waste contamination assessments and cleanup plans for the site.

Although community residents are generally pleased with having TAG grants, they also expressed concern about administrative burdens that make it difficult to apply for, obtain, and use a grant. Specifically, residents in several communities complained that the TAG program application process is lengthy, labor intensive, and intimidating. They also said that the grant management process has cumbersome procurement procedures and burdensome documentation retention requirements. Moreover, some community residents complained that the reimbursement procedures were confusing and were causing delays in receipt of funds. EPA has attempted to resolve some of these concerns by clarifying the application procedures, reducing some of the administrative burdens, and amending the procurement procedures. However, we believe that additional efforts are needed to strengthen public outreach of the TAG program and reduce application and documentation retention burdens while maintaining the integrity of the grant award process.

There are also two issues that merit attention during the upcoming Superfund program reauthorization. They are (1) clarifying the extent to which TAG recipients may use grant monies to independently verify or clarify existing site cleanup analyses or information, and (2) assessing the impact that an EPA-proposed model for accelerating the Superfund cleanup process will have on the TAG program and community involvement.

Before I get into a more detailed discussion of our findings, let me provide you with some background on the TAG program and basic TAG application and use procedures.

BACKGROUND

The Comprehensive Environmental Response, Compensation, and Liability Act established the Superfund program to clean up the nation's most dangerous hazardous waste sites, and EPA is responsible for administering the program. At the end of fiscal year 1992, there were 1,275 sites in the program; EPA projects that the number of Superfund sites may grow to 2,000 by the end of this century.

Cleanup of a Superfund site can be technically complex, cost about \$25 million on average, and take more than 10 years to

complete. In addition to regulatory and legal requirements, site cleanups involve a range of technical considerations, such as analytical assessments of the conditions at the site, the wastes involved, and the technology available to perform the cleanup. If EPA determines that conditions at a site require immediate action, the agency conducts an emergency waste removal. Other sites are studied in-depth in order to design the appropriate long-term cleanup remedy. (See App. II for a model of the cleanup process.)

Community involvement in the cleanup decision process is a key component of the Superfund program and can assist in timely and effective site cleanups. The TAG program, established by EPA under section 117 (e) of CERCLA, as amended, provides grants of up to \$50,000 to communities involved in a Superfund cleanup. Communities may use the grants to hire independent technical advisors to aid them in understanding and commenting on the technical aspects of the cleanups. Communities can also use the grant to keep the residents informed about the status and progress of cleanup work at the site by sponsoring town meetings and publishing newsletters. Congress authorized \$17.7 million for the TAG program from fiscal year 1988--when the program was implemented--through fiscal year 1992.

EPA's guidance requires regions to inform communities about the TAG program during EPA's initial site visits. Communities may apply for the grant once a site is listed or proposed as a Superfund site, and grants may be awarded once the remedial investigation and feasibility study process has commenced. TAGs are reimbursable grants that may not exceed \$50,000--except in cases where a single application covers multiple sites or when a site is unusually complex--and are usually awarded for a 3-year budget period.¹ Communities must provide a 20-percent match of the grant funds actually spent, unless EPA waives this requirement for communities that are experiencing financial hardship. Communities may not use the grants to challenge final EPA decisions, underwrite disputes with the agency, pursue legal actions such as the preparation of testimony or hiring of legal witnesses, or develop new information (i.e., additional sampling at the site).

Previous studies examined the TAG program and identified requirements that made it difficult for communities to receive and use grants.² These requirements included the limitation of a 15-

¹Grants may extend beyond the original 3-year period, but communities must submit a continuation application prior to the end of the period.

² The following four previous studies examined the TAG program:
(1) Superfund Technical Assistance Grant Program, CH₂M Hill, June
(continued...)

percent administrative cap on use of the grant fund; the need for communities to incorporate prior to applying for a grant; the restrictions on obtaining a waiver to the match requirement; and the restrictions on use of the fund, especially for taking additional samples at the site. In response to these studies, EPA has addressed some of these concerns by eliminating the administrative cap, easing the incorporation requirements, decreasing the match amount from 35 to 20 percent, and easing the restrictions for obtaining a waiver to the grant match requirement.

With this information in mind, I would like to discuss our findings in more detail.

SMALL PERCENTAGE OF COMMUNITIES PARTICIPATING IN THE TAG PROGRAM

Only a small percentage of potentially eligible communities are applying for and receiving technical assistance grants. At the time of our review, only 114 communities had applied for a grant in the TAG program, and EPA had awarded a total of 103 grants to communities. These 103 grants represent only 9 percent of the approximately 1,150 communities that may be eligible for the program. While we recognize that some of these communities may not meet the eligibility criteria for a grant, the number of communities that have been awarded grants appears disproportionately small when compared to the universe of potentially eligible communities.

In addition, the total dollar value of TAG grants awarded is much less than the amount authorized for the program. For example, the \$5.1 million in total grant awards represents only 29 percent of the \$17.7 million that has been authorized for the program. EPA has recently increased grant award activity--grants awarded in the past 2 years have more than doubled the total number of awards. (See App. III for information on the grant awards by year and region.) Despite this increase, the percentage of potentially eligible communities that are grant recipients remains low.

We believe that the limited emphasis that EPA places on TAG program outreach at the headquarters and regional levels may be contributing to the low participation in the program. EPA has delegated management of the TAG program to the regions and provides little guidance and limited headquarters oversight of regional performance in awarding TAG grants. In fact, at EPA headquarters, there is only one full-time staff member devoted to administration

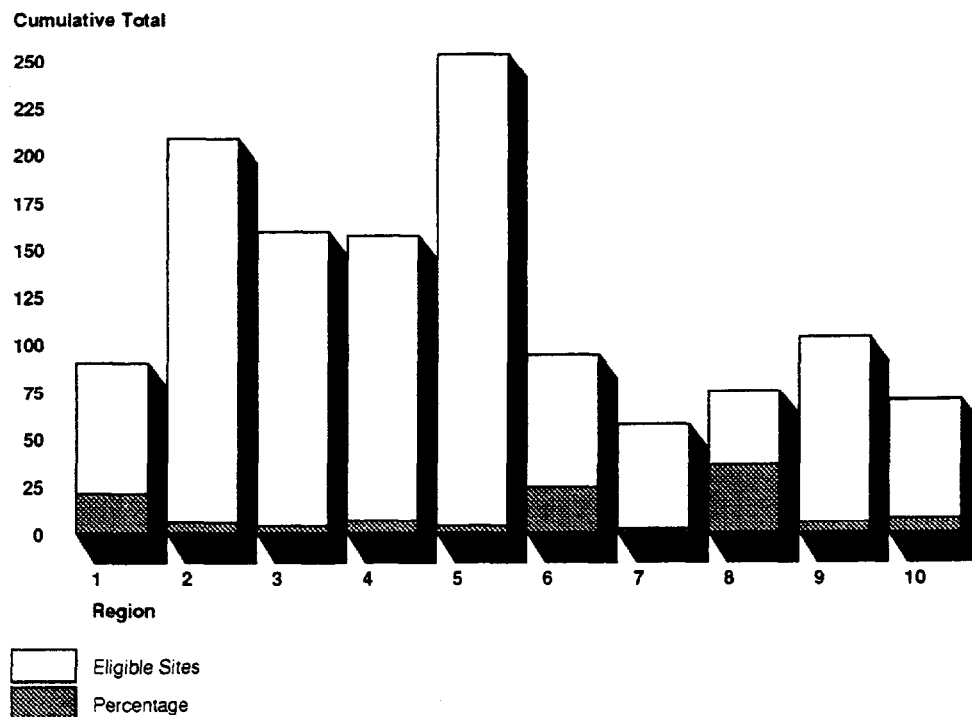
²(...continued)

1991; (2) Final Survey Report on the TAG Program, CH₂M Hill, June 1989; (3) EPA's Superfund TAG Game, Representatives Edward J. Markey and James J. Florio, March 1989; and (4) A Management Review of the Superfund Program, Environmental Protection Agency, June 1989.

of the TAG program. As such, the regions are responsible for nearly all aspects of the TAG program's implementation, including informing communities of the availability of grants, providing communities assistance in applying for grants, reviewing grant applications, and awarding grants.

We found significant regional variations in the awarding of grants. For example, the ratio of TAG awards to potentially eligible communities ranged from a low of 2 percent in EPA's Region VII to a high of 35 percent in Region VIII. Figure 1.1 shows the ratio of grant awards to potentially eligible communities for each EPA region.

Figure 1.1: Ratio of TAGs to Potentially Eligible Sites



Source: 1991 EPA Superfund Update

One factor that has contributed to the regional variance in grant awards appears to be the differences in regional emphasis and effort devoted to TAG community outreach. The EPA regions that emphasized outreach generally awarded a higher percentage of grants. For example, Region VIII, which had the highest TAG award percentage, placed relatively high emphasis on the program. Specifically, the region had seven individuals involved in the program, including a designated TAG Coordinator and Assistant Coordinator who have served in those capacities for 5 and 4 years, respectively.

The Region VIII TAG Coordinator told us that the region values the TAG program because it helps to increase community understanding of the technical aspects of a Superfund cleanup. Consequently, the TAG regional staff emphasizes public outreach to foster community awareness and interest in the grant program. For example, the region produced a TAG program video that it uses to inform communities about the availability of the grants. The region also places great emphasis on training its staff and obtaining consensus on the value of the TAG program from key EPA Superfund staff involved in the cleanup process--such as the site's remedial project manager, who has extensive interaction with the community.

In contrast, Region VII, which had the lowest TAG award percentage, did not have any EPA staff devoted exclusively to the program. The region relied primarily on a contractor to manage the one grant that it had awarded. Regional management seemed less supportive of the TAG program, stating that the grants were only somewhat helpful at assisting communities understand the technical aspects of a cleanup given the time it took the region to assist with the application and to run the program.

The Chief, State and Local Coordination Branch, Office of Emergency and Remedial Response (OERR), acknowledged that the EPA regions varied in the percentage of grants awarded to potentially eligible communities. The OERR official stated that differences in the level of TAG program outreach efforts and emphasis among the regions was likely a major contributing factor for these regional variances. The OERR official stated, however, that the program is decentralized and, as such, the regions exercise full control over the specific procedures they use to conduct community outreach. The official also stated that regions experience different community relations needs and concerns and are expected to conduct community outreach consistent with those needs.

While we recognize the need for EPA to decentralize operation of the TAG program to meet regional needs, we believe that proper headquarters oversight of regional performance is needed to ensure that regions are effectively awarding grants and achieving the TAG program's objectives. The regional variations in the level of effort and emphasis toward public outreach and in the number of grants awarded indicate that current headquarters oversight over regional performance falls short of ensuring that regions are achieving these objectives.

COMMUNITIES ARE BENEFITING FROM TAG AWARDS

Communities that have been awarded TAG grants are generally pleased with the benefits derived from having the grants. We contacted 10 judgmentally selected grant recipients to determine their experiences with the grants. All of the communities were using or were planning to use the grants to hire technical advisors

to assist them during the site cleanup. Examples of such assistance included reviewing site-related products prepared by EPA and others, meeting with community residents to explain technical information, helping the community express site-related concerns, participating in site visits, and attending meetings and hearings related to the site. One Region III community representative told us that the grant greatly benefitted the community because the technical advisor was able to educate local residents about site conditions and hazards and to explain planned actions for cleaning up the site.

Nine of the 10 communities we contacted were satisfied with the quality of services provided by their technical advisors. For example, community representatives generally told us that the TAG advisors had provided valuable assessments of key EPA documents used to select a remedy for the site cleanup process--such as feasibility studies and proposed records of decision. Some community residents said their advisors allowed them to have greater input into the cleanup process.

Communities were also using the grants to keep the residents informed about the status and progress of cleanup work at the site. Some community residents said that they were publishing articles written by the TAG advisor in monthly newsletters or fact sheets that described the nature and hazards of contaminants at the site. For example, a community located in Region X had its advisor write a series of nontechnical articles for its local newsletter to inform residents about the health and environmental concerns of volatile organic compounds found at the site. The community spokesperson said the articles helped to increase community understanding of contamination problems at the site and the potential dangers they posed to the community.

SOME ADMINISTRATIVE REQUIREMENTS POSE BURDENS TO THE COMMUNITY

Although the communities we contacted generally benefitted from having TAG awards, many communities expressed the following concerns about administrative burdens that make it difficult to apply for, obtain, and use a grant: (1) the application process is lengthy and labor intensive, (2) the procurement procedures make it difficult to hire an advisor, and (3) the reimbursement procedures delay grant payments. Many of these concerns were pointed out to EPA in studies as early as 1989, and the agency has attempted to resolve them. However, TAG communities claim that many of these concerns still exist.

Application Process Is Lengthy and Labor Intensive

In June 1991, CH₂M Hill issued a study which criticized the TAG application process as being unnecessarily complex. The study, which was based on interviews with 115 potentially eligible

communities, found that nearly every group complained that the TAG application was too complex, overly bureaucratic, and too time-consuming for groups that rely on volunteers to complete the application. The study stated that many groups suggested that changes were needed in the format of the application process.

Five of the 10 communities we contacted that had TAG applications pending or recently approved also described the TAG application process as burdensome, lengthy, and intimidating. We found that it takes, on average, about 9 months to apply for and receive a TAG award. To apply for a grant, a community group must first submit a letter of intent notifying EPA of its interest in applying for a grant. EPA then formally notifies other community groups that could be eligible of the pending application and provides a 30-day waiting period for these parties to notify EPA of any intent they may have to apply for a grant. If there is no other interest, EPA accepts the applicant's package for review.

The application package consists of 31 pages of instructions and forms that must be completed. Items that must be completed include:

- SF-424 Application for Federal Assistance;
- 5700-78 Procurement System Certification;
- Certification assuring a drug free workplace;
- Certification that contractor was never debarred or suspended;
- Narrative Statement of Work for Technical Advisor;
- Narrative statement addressing, if applicable, quality assurance controls;
- Itemized Budget;
- Name and Telephone Number of the Project Manager; and
- Biographical Sketch of the Project Manager.

Community representatives we contacted questioned the relevance and usefulness of some of this information so early in the process. Others complained that the application requires excessively detailed information. For example, some community TAG applicants and recipients we contacted complained about the need to provide a 3-year itemized budget projection and a detailed scope-of-work narrative. To do this, the community must specify all the technical advisor's expected tasks and list specific documents, reports, and work products that the advisors are expected to produce. Community representatives say that it is very difficult to provide this information at such an early stage of the process, since many of these local community groups do not have any prior experience in grant management and administration.

Applicants are also required to provide other complex information, such as a description of the economic and environmental impact of the contamination at the site, a description of their past performance in completing other projects and contracts, and signed assurance forms promising compliance with

all applicable federal statutes, such as the Hatch Act, the Drug Abuse Office and Treatment Act, and the Civil Rights Act. Moreover, the application may still undergo a state government review, where additional information may be requested.

One community representative described the application process as taking "a painfully long period of time." Another representative stated that "It is the most ridiculous thing to say this is to help communities." The representative complained about the difficulties that local residents had in filling out the TAG grant application. According to this community representative, the residents who filled out the application met for 12 weeks and followed advice provided by a college student volunteer, meeting every week except when the student had exams.

EPA TAG officials acknowledged that most applicants require extensive EPA assistance to complete the application. On average, EPA regional officials estimate that it takes approximately 6 days to help a TAG applicant complete the application. In an extreme case, EPA Region IX officials said that they worked with one TAG applicant for 2 years to finalize and approve the application. EPA officials partly attributed this delay to the community's problems understanding how to prepare the TAG application.

EPA says it has recently acted to help ease the burden of the application process on communities. Effective October 1, 1992, EPA has eliminated the requirement for a separate letter of intent and will now permit applications to serve this purpose. EPA regions will also be permitted to approve waivers that allow communities to obtain TAG grants of more than \$50,000 for sites that are unusually complex. Although these actions may prove to be somewhat helpful, we believe that they will not resolve all of the application burdens and concerns raised by TAG applicants and recipients. EPA TAG officials acknowledged that administrative burdens in the application process continue to exist and that additional modifications may be possible, such as simplifying the three-year budget and scope-of-work narratives. Based on the results of our review, EPA TAG officials expressed a willingness to consider additional application modifications to further simplify the process.

Procurement Procedures Make It Difficult To Hire An Advisor

Once approved as a TAG recipient, communities can use the grant funds. However, TAG recipients expressed concern that EPA's procurement procedures make it difficult to hire technical advisors. Currently, EPA regional officials estimate that it takes a community an average of 6 months to hire technical advisors after receiving the award. This time frame can affect the community's involvement in the cleanup because key milestones--such as the remedial investigation--continue regardless of the timing of TAG awards and the hiring of TAG advisors. In two cases, TAG

recipients expressed the feeling that EPA was attempting to exclude the community from some of the key decisions they wanted to be involved in--such as determining where and what the site contaminants were--due to the lengthy amount of time it took to receive the grant and hire TAG advisors.

At the time of our review, communities were required to comply with a host of federal procurement requirements, including avoiding conflicts of interest, by (1) hiring advisors that have not worked on the Superfund site for EPA or the potentially responsible party (PRP), (2) making positive efforts to hire small and minority-owned business enterprises, (3) awarding TAG contracts to the lowest bidder unless detailed written justification is provided for contracts of \$25,000 or less, (4) obtaining written bids from at least three potential advisors for contracts over \$10,000, and (5) conducting cost analyses of the services to be provided for contracts over \$25,000. Individually, many of these requirements may be needed to maintain the integrity of the process, but TAG recipients stated that collectively they pose a burden for TAG grant communities.

In the 1991 CH₂M Hill study and our review, community representatives expressed concern about complying with the conflict-of-interest requirements. In small communities, this issue appears to be a greater concern due to the small pool of qualified persons and job opportunities. For example, a representative from one small community in Colorado called over 100 potential advisors and was only able to obtain one bid either because the other advisors had worked, or did not want to preclude themselves from working, for EPA or the PRP. In addition, some EPA regions encourage communities to use advisors that are on an EPA list of contractors, a practice that these regions believe avoids potential conflict of interest. Some communities, however, expressed concern about the practice of hiring independent technical advisors from an EPA list and, instead, preferred to pick their own advisors.

Once a TAG advisor is hired, a community must obtain written EPA approval for any major changes to an advisor's contract and must maintain all procurement-related documentation for 3 years after the grant is closed out. After that period of time, the community must obtain written permission from EPA to destroy any records. One TAG recipient with an active grant stated that one room in her house and part of her garage were already filled with grant-related documentation. The recipient questioned why she was required to keep all of this documentation for such a long period of time.

EPA officials told us that the documentation retention requirement was necessary to allow for future EPA cost-recovery efforts. In fact, the requirement was changed to require that such documentation be maintained for 10 years. An EPA official told us

that EPA will keep the grant records for the TAG recipients if requested to do so. However, we did not find any cases where the community knew about this EPA service, and at the time of our audit, EPA had no plans to notify TAG recipients of this service.

EPA also does not have any plans to revise the current conflict-of-interest or documentation retention requirements because it says these controls are needed to maintain the integrity of the program. However, EPA has recently acted to streamline the TAG procurement procedures. Effective October 1, 1992, EPA has revised the procedures for grants under \$50,000 to make it easier for communities to hire TAG advisors. Under the new procedures, a community no longer has to provide written bids for purchases under 25,000 and only needs to document its files that three written bids were obtained for purchases between \$25,000 and \$50,000. EPA has scheduled TAG training sessions for the fall of 1992 where the agency plans to discuss these new procurement procedures with regional TAG management personnel.

TAG Reimbursement Procedures Delay Grant Payments

Another burden cited by TAG recipients concerned the program's reimbursement requirements. Specifically, a few communities said these procedures caused delays in receiving funds and that the reimbursement process was confusing and time-consuming.

EPA's reimbursement procedures only allow TAG recipients to submit vouchers on a quarterly basis, unless the expenditures exceed \$500--in which case the vouchers can be submitted monthly. TAG recipients complain that this reimbursement procedure causes delays in being reimbursed for services received. For example, one grant recipient in Region III told us that, by not submitting vouchers as expenses are incurred, the community was sometimes prevented from paying their advisors until several months after the work was completed. Concerns with timeliness of EPA's reimbursement procedures were also noted in the 1991 CH₂M Hill study. For example, some groups stated that the time to get a TAG reimbursement was too lengthy and should be reduced. One TAG recipient that we contacted complained that it often took 2 to 3 months to be reimbursed.

TAG recipients also told us that the reimbursement procedures can be confusing and time consuming. For example, one TAG recipient in Region VIII told us that she had significant problems understanding instructions for submitting the vouchers and interpreting the reimbursement procedures. The recipient found it necessary to rely on EPA's contract employee to explain which grant expenditures were reimbursable and how to document cost outlays and unliquidated obligations on the financial sheet.

In response to these concerns, EPA officials said that, during the upcoming TAG training sessions, they will encourage their

regions to assist TAG recipients in understanding and complying with the reimbursement procedures. Moreover, although EPA is sympathetic to TAG recipients' concerns over grant reimbursement delays, the quarterly/\$500 monthly voucher submission policy is necessary to prevent regional grant management staff from becoming inundated with individual claims for small amounts. In addition, EPA has explored the possibility of advancing a small amount of grant funds to the community before actual expenditures occur, but federal grant regulations prohibit EPA from doing this.

ISSUES THAT MERIT ATTENTION FOR THE PROGRAM'S REAUTHORIZATION

Finally, we would like to point out two related issues that merit attention during the upcoming Superfund program reauthorization proceedings. These issues involve (1) clarifying the extent to which TAG recipients may use grant monies to independently verify or clarify existing site cleanup analyses or information, and (2) assessing the impact that a proposed model for accelerating the Superfund cleanup process will have on the TAG program and community involvement.

Currently, TAG recipients are allowed to use the grant money to increase their understanding of the technical aspects of site cleanup decisions and to inform the community of the status of the cleanup. However, there are instances where communities, after having its technical advisor review site assessment information, may ultimately disagree with the sampling procedures or selected cleanup approach. Program regulations currently prohibit grant recipients from using TAG money for "conducting disputes with the Agency." Consequently, EPA does not allow grant money for such activities as developing new information or additional sampling.

Some TAG recipients we interviewed were frustrated by these restrictions and believed that, where legitimate concerns or disagreements arise based on the findings of the TAG advisor, the community should be allowed to use a portion of the grant money for selected actions intended to clarify the situation and to alleviate its concerns, such as taking additional samples. EPA believes the grant money should be used to inform and allow communities to participate in the cleanup process. Agency officials say there are other options available for communities to pursue and resolve disagreements or disputes with EPA. We believe that there are areas of subjectivity in trying to define activities that constitute keeping a community informed about cleanup work at a Superfund site. Although it will never be possible to remove all subjectivity from this issue, we believe that attention toward clarifying it during the upcoming reauthorization debate could help remove some of the subjectivity that currently exists.

The second issue that merits attention by the agency involves the extent to which EPA's proposed Superfund Accelerated Cleanup Model (SACM) may impact the TAG program's ability to involve the

community before significant cleanup actions have occurred. Most TAG grants are awarded during the remedial investigation or feasibility study. Under SACM, EPA plans to move more aggressively to clean up site hazards and contaminants earlier in the process. Citizen input through the TAG program, as currently structured, may not occur until after significant cleanup has occurred. Although we support EPA's efforts to accelerate the pace of Superfund cleanups, we are concerned about the impact that such an accelerated schedule would have on the availability and timing of TAG awards and the ability of EPA to get affected communities involved in the cleanup process at an earlier stage. EPA TAG officials acknowledge our concern and agree that this issue will need to be addressed before SACM is implemented.

CONCLUSIONS

In conclusion, Mr. Chairman, TAG awards appear to be serving a useful purpose in helping the public understand and participate in cleanups of Superfund sites in their communities. However, the public outreach, grants management, and administration concerns we have discussed may be limiting the public's participation in the program. If so, EPA may be missing a valuable opportunity for gaining greater involvement and participation from communities currently involved in a Superfund cleanup.

To its credit, EPA's recent efforts to streamline the procurement procedures appears to be a step in the right direction. However, this action alone is not sufficient. Limited TAG public outreach efforts and administrative barriers continue to exist and these may be limiting communities' access to the program and preventing these communities from deriving the benefits that the program offers. Moreover, with the program reauthorization upcoming, attention toward clarifying how TAG recipients may use the grant monies and how SACM may affect the program could minimize additional concerns in the future.

RECOMMENDATIONS

To improve the effectiveness of and ease the administrative burdens associated with the TAG program, we recommend that the Administrator, EPA, direct the Assistant Administrator, Office of Solid Waste and Emergency Response, to

- strengthen headquarters oversight of regional TAG procedures and performance to ensure that the regions are effectively awarding grants and conducting TAG program public outreach;
- review the current application process and minimize the burden of applying for a TAG grant by simplifying, to the extent possible, such things as the 3-year budget and scope-of-work narratives; and

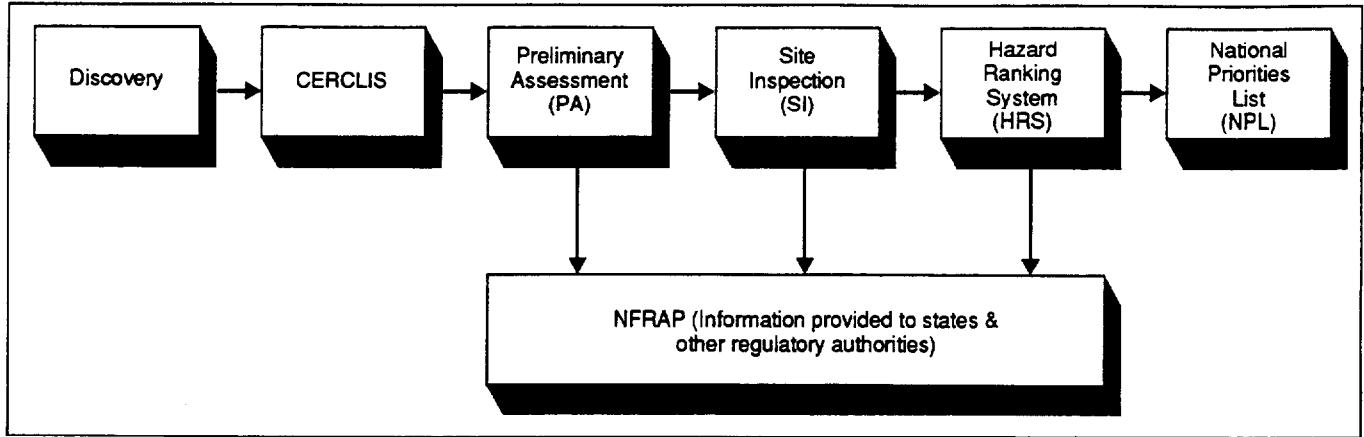
- notify TAG grant recipients that EPA will provide storage for their grant-related documents.

LIST OF COMMUNITY GROUPS GAO CONTACTED

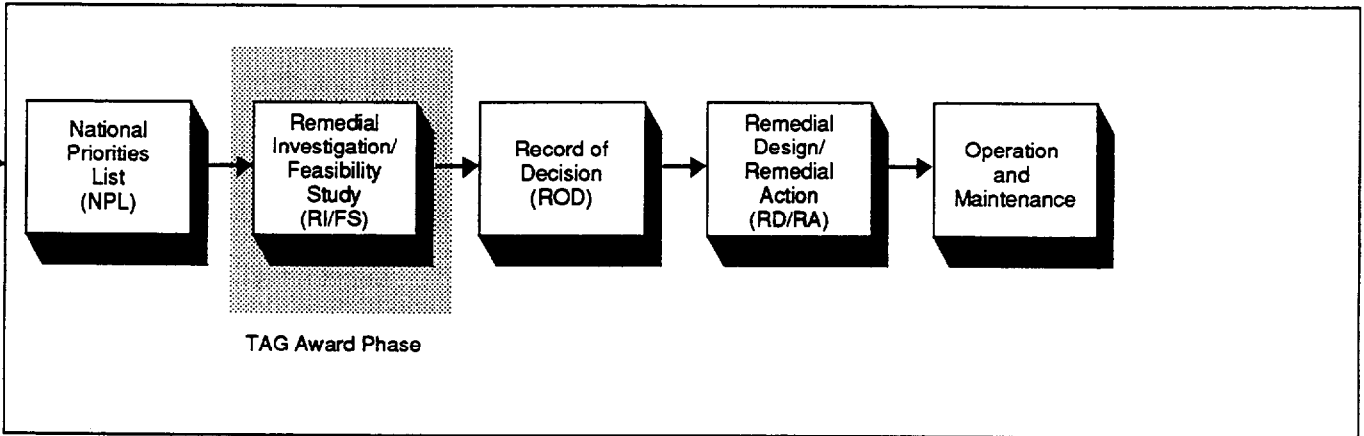
<u>Community Group</u>	<u>Site</u>	<u>Location</u>
For A Cleaner Environment	Industriplex	Woburn, MA
Barkhamstead Residents Acting to Conserve the Environment	Barkhamstead-New Hartford Landfill	Barkhamstead, CT
Foster Township Task Force	C and D Recycling	Foster Township, PA
Greenwood Superfund Oversight Coalition	Greenwood Chemical	Greenwood, VA
Clean Water and Environment Project for Shiloh	Koppers Superfund	Morrisville, NC
Homes, Environment, and Lives in Peril	Brio Refinery Company, Inc.	Houston, TX
Texarkana Black Chamber of Commerce	Koppers Superfund	Texarkana, TX
Citizens Against Contamination	Rocky Mountain Arsenal	Adams County, CO
Rocky Flats Cleanup Coalition	Rocky Flats Plant	Denver, CO
Citizens Against Lowry Landfill	Lowry Landfill	Arapahoe County, CO
Association of Bainbridge Communities	Wycoff/Eagle Harbor	Bainbridge, WA
Idaho Citizens Network	Bunker Hill Mining	Kellogg, ID
People for Community Recovery	Lake Calumet	Chicago, IL
South Farmingdale Community Group	Liberty Industrial Finishing	Nassau County, NY
Calvert City Coalition	B.F. Goodrich	Calvert City, KY

MODEL OF SUPERFUND CLEANUP PROCESS

Site Assessment Phase



Remedial Phase



Removal actions may occur at any stage.

REGIONAL TAG AWARDS BY YEAR

Region	1	2	3	4	5	6	7	8	9	10	Total
FY 1988	3	2	1	1	0	0	0	0	0	0	7
FY 1989	1	4	1	1	3	0	1	4	4	1	20
FY 1990	3	3	1	1	0	5	0	1	1	0	15
FY 1991	5	4	1	1	2	7	0	3	0	1	24
FY 1992	6	1	2	6	6	5	0	6	2	3	37
Total	18	14	6	10	11	17	1	14	7	5	103

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