



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET NW
WASHINGTON, D.C. 20314-1000

OCT 28 2004

CEMP-IS (415)

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Business Process for Funding U.S. Environmental Protection Agency (USEPA) Superfund (SF) Program Management and Support (M&S) Activities from Superfund Project Interagency Agreements (IAGs)

1. References:

a. USEPA policy letter of 30 Jun 2004, at enclosure 1, subject: *Assigning Corps Administrative Costs to Site-Specific Agreements.*

b. USEPA policy letter of 22 Sep 2004, at enclosure 2, subject: *Revision to the Memorandum Assigning Corps Administrative Costs to Site-Specific Agreements.*

c. My memorandum of 24 Sep 2004, subject: *Planned New Business Process for U.S. Environmental Protection Agency (USEPA) Funding to USACE Superfund (SF) Program Management and Support (M&S) Activities from Superfund Project Interagency Agreements (IAGs).*

2. This memorandum establishes a new business process, effective 1 October 2004, for funding M&S and cost recovery support activities for the USEPA SF response action program. This process has been approved by USEPA in references 1a and 1b because it will allow them to capture this funding under their SF cost recovery program. The process applies to all USACE elements that support the USEPA SF Program. It will replace existing processes for obtaining USEPA SF M&S funds and cost recovery support funds, and will not expire.

3. The USACE provides support to the USEPA SF Program for environmental response actions under the Comprehensive Environmental Response, Compensation and Liability Act. Funds and work assignments are received from USEPA via interagency agreements (IAGs). Under current procedures, the USEPA regional offices execute IAGs with USACE districts to assign and fund projects and certain other activities. Headquarters (HQ) USEPA and HQ USACE have previously executed IAGs to provide funding to USACE for M&S activities at HQ USACE; the major subordinate commands, the Hazardous, Toxic and Radioactive Waste Center of Expertise (HTRW-CX) and some districts. HQ USEPA also has previously funded the USACE for cost recovery support.

CEMP-IS(415)

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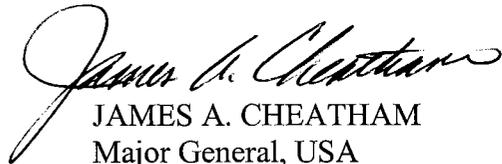
4. The new business process is prompted by HQ USEPA direction that USACE obtain M&S and USEPA cost recovery support funds, in the future, from Superfund project IAGs. This will eliminate the need for funding these items by IAGs executed at the HQ level as is currently the case. The procedure at enclosure 3 describes the required transition and the end-state business processes. Reference 1c provides a summary of the activities supported by M&S funds and a set of questions and answers that provide additional useful background information.

5. This memorandum was coordinated with Counsel and Resource Management.

6. My point of contact is Greg Jordan in CEMP-IS at (202) 761-8817.

FOR THE COMMANDER:

Encls



JAMES A. CHEATHAM
Major General, USA
Acting Director of Military Programs

CEMP-IS (415)

SUBJECT: Business Process for Funding U.S. Environmental Protection Agency
(USEPA) Superfund (SF) Program Management and Support (M&S) Activities from
Superfund Project Interagency Agreements (IAGs)

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CENWO-HX-P (Ohnstad, D.)
CERM-F (LeBleu, S.)
CERM-ZC (Coakley, S.)
OASA(CW) (Smith, B.)



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

JUN 30 2004

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

OSWER 9355.0 -104

MEMORANDUM

SUBJECT: Assigning Corps Administrative Costs to Site-Specific Agreements

FROM: *Michael B. Cook*
Michael B. Cook, Director
Office of Superfund Remediation and Technology Innovation

Debbie Y. Dietrich, Director
Office of Emergency Prevention Preparedness and Response

James E. Woolford, Director
Federal Facilities Restoration and Reuse Office

TO: Superfund National Policy Managers, Regions 1 - 10

Purpose

The purpose of this Memorandum is to inform you of a change in assigning U.S. Army Corps of Engineers (Corps) administrative costs to site-specific agreements. The Corps' administrative costs for management and support services provided by the Headquarters (and other offices) of the Corps for the oversight of EPA Superfund program projects carried out under Interagency Agreements (IAGs) will now be distributed equally to all new and ongoing projects. This change also will make these costs site-specific.

Background

The Corps currently manages about 450 active IAGs for site-specific EPA Superfund projects. EPA's Regional offices issue these IAGs to various Corps District Offices. Under these IAGs, the Corps provides technical support for Superfund remedial, removal, and Federal Facility projects. For the past twenty years, EPA Headquarters has paid the administrative costs of Corps Headquarters, Divisions, and Center of Expertise administrative services for these projects as non-site costs. A summary of the types of administrative services provided by the Corps is included as an attachment to this memorandum.

Enclosure 1

We are reviewing every aspect of the Superfund program to find ways to more accurately assign and monitor costs. Because these Corps administrative support costs directly or indirectly benefit all projects, their distribution to all projects equally as an indirect overhead expense is considered most appropriate. This will result in a significant long-term cost reduction to the Superfund budget by permitting these costs to become site-specific and thus, cost recoverable from responsible parties. Costs will also be shared by States for Fund-lead remedial action projects and again by responsible parties if a project is using Special Account funds. This also ensures that the administrative costs will be equitably shared by the remedial, removal, and Federal facility programs.

Based upon historical information, a two percent (2%) indirect overhead rate should provide sufficient funding to enable the Corps to continue to provide a reasonable level of management and support equivalent to that previously provided and paid for under IAGs with EPA Headquarters. The Corps will apply this 2% overhead rate to all costs (including in-house labor and contractor costs) in each project invoice for work completed under an IAG. Annually, OSRTI will review and negotiate the estimated administrative overhead budget prepared by the Corps Headquarters. The approved budget will be compared with a forecast of the funds to be generated prior to determining whether the rate will need future adjustment.

Conclusion/Implementation

As of the signature date of this Memorandum, the Corps will (as soon as practicable) begin applying a 2% indirect overhead rate to all invoices for ongoing work on all active and new IAGs for Superfund remedial, removal and Federal Facility program projects. For ongoing projects, only new incremental funding added after this date would be subject to the 2% indirect overhead rate.

The subject matter specialist for this document is Ken Skahn, Liaison to the Corps of Engineers for the Superfund program. Ken is in OSRTI and can be reached at (703) 603-8801.

Attachment

cc: OSWER Office Directors
OSRTI Division Directors
Susan Bromm, OSRE
Earl Salo, OGC
Nancy Riveland, Superfund Lead Region Coordinator, USEPA Region 9
Jeff Josephson
NARPM Co-Chairs
Joanna Gibson, OSRTI Documents Coordinator
Patricia Rivers, US Army Corps of Engineers, HQ
Kip Huston, US Army Corps of Engineers, HQ

Attachment

ADMINISTRATIVE SUPPORT ACTIVITIES
PERFORMED BY THE U.S. ARMY CORPS OF ENGINEERS (USACE)

The U.S. Army Corps of Engineers (Corps) provides support to all levels of the Environmental Protection Agency's Superfund program. The most visible support is that of the project or site technical, real estate, contracting, construction management and other support provided by Corps Districts to the EPA Regional Offices. In addition to this, Corps Headquarters, Division's and Hazardous, Toxic and Radioactive Waste (HTRW) Center of Expertise (CX) provide management, oversight and technical support to Corps Districts. The Corps refers to this as Management and Support or M&S. Below is a summary of M&S services:

Corps Headquarters and Division Offices: The Corps Headquarters and Division offices provide top-level command and control of the Corps' support to EPA's Superfund Program as outlined in the current Memorandum of Understanding. The following is a list of major areas where support is provided:

- Ensure "One Door to the Corps" service for EPA.
- Develop, coordinate and implement policy and technical guidance regarding interagency agreements, contracting, safety and occupational health, real estate, construction, resource management, project management, public affairs, etc.
- Facilitate EPA's review of Corps support to Superfund. Implement recommendations from the review.
- Monitor and conduct reviews of Corps Interagency Agreement (IAG) funding to identify potentially available excess funds. Facilitate the return of excess funds to EPA.
- Conduct and participate in meetings and conference calls with EPA management and staff to identify and track progress of superfund support policies, guidance, issues and actions.
- Monitor and track Corps support and facilitate program and project execution issues.
- Resolve issues between Corps division offices.
- Maintain and oversee staff of Superfund Division Coordinators to closely interface with Corps Districts and EPA Regions to: Monitor project performance and EPA satisfaction; monitor division-wide workload of Superfund remedial action, remedial design, enforcement and various/types of technical assistance projects; ensure critical project milestones are maintained; monitor obligations and expenditures pursuant to IAG schedules and projected funding levels; coordinate with Corps Headquarters and EPA Regions; participate in program and project review meetings; coordinate and perform regular site visits; and work with EPA Regions to evaluate needs and project requirements and various district capabilities for assigning project work among districts to ensure optimum product quality and customer satisfaction.

- Manage and oversee HTRW-CX support to the Superfund Program, including IAG processing, Superfund Cost Recovery actions, IAG and Cost Recovery Workshops with EPA Regions and Corps Districts, etc.
- Coordinate rapid response CX support to EPA Regions and Corps Districts for cost reimbursable contract management start-up, training and tiger teams.
- Conduct annual joint EPA and Corps Superfund Site Remediation Conference (SRC).
- Review and coordinate contract acquisition plans involving Superfund.
- Respond to inquiries from EPA and GAO on Superfund program execution.
- Provide and monitor technical liaison support to EPA Headquarters.
- Provide legal services and advice encompassing legislative interpretation, questions related to Corps and EPA authorities, procurement oversight and strategy development of innovative contracting mechanisms to improve program execution capabilities, contract litigation and procurement protest activities, fiscal law issues on availability of funding and limitations on funding utilization, and conflicts of interest matters associated with program execution and other Corps mission requirements.
- Coordinate and monitor real estate support for activities involving institutional controls, relocations, easements, guidance, Real Estate Planning Reports, etc.
- Monitor development and maintenance of groundwater model for use by EPA Regions and others at the Corps' Engineering Research and Development Center (ERDC).
- Monitor and report Small and Disadvantaged Business utilization.
- Provide and monitor contaminated sediment guidance development and technical support provided through ERDC at the Waterways Experiment Station (WES) in Vicksburg, MS.
- Prepare and manage Superfund Management and Support (M&S) Program Budget.

Hazardous, Toxic, and Radioactive Waste Center of Expertise (HTRW CX): The HTRW CX provides a wide range of technical expertise and support to the Superfund Program. The following is a list of major areas where support is provided:

- Provide technical expert representation at meetings, seminars, conferences, site visits and other forums.
- Provide technical assistance in the form of reports, reviews, fact sheets, project meetings and site visits.
- Develop and provide technical guidance for EPA and the Corps.
- Assist with 5-Year Reviews.
- EPA Guidance Reviews – Review and provide written comments to EPA Headquarters.
- EPA Requested Reviews - Review and provide comments to reports to EPA Headquarters.
- Provide technical assistance to Corps Districts on EPA Regional Superfund projects.
- Review project/site cost estimates, contractor work plans, technical documents.
- Provide national financial and technical support for Superfund Interagency Agreement

(IAG) processing to EPA Headquarters, Regions, and Financial Management Center, and Corps Headquarters and Districts/Divisions.

- Develop and implement, with EPA, the Superfund IAG Training Workshop to train Corps District and EPA Regional staff on preparation and implementation of Superfund IAG's.
- Provide extensive support to EPA Regions and Department of Justice for Superfund Cost Recovery. During fiscal year 2003, responded to cost recovery requests on 11 projects. Successfully documented 99% of the cost incurred on those projects or approximately \$12.5 million.
- Serve on the Corps' Radiation Safety Support Team (RSST) to provide technical, regulatory, and on-site field support to districts and USEPA during all phases of radioactive waste environmental restoration projects, as well assist Corps Districts in implementation of their command's Radiation Safety Program.
- Support the "Triad Approach" by increasing awareness through training and tools, engaging more Triad advocates, supporting Triad use on sites, setting up the Corps' Triad technical support network, and documenting case studies.
- Provide instructors for Corps CERCLA/RCRA Remediation Process Workshop.
- Provided technical support for the waste profiling and manifest reviews. Provide Corps District staff with clarification issues regarding listed waste and pesticide manufacturing processes.
- Support the joint EPA/Corps Superfund Electronic Data Deliverable (SEDD) to develop a common Electronic Data Deliverable (EDD) to deliver chemistry data from analytical testing laboratories to data "requesters".
- Manage the Federal Remediation Round Table (FRTR) Website for EPA Headquarters. Manage the day-to-day maintenance of the site, answering user questions, and updating information as requested by FRTR members. Coordinate major improvements in the Website look and functionality along with updates to the Technology Screening Matrix.
- Prepare and develop Superfund Independent Government Cost Estimates (IGCE) guidance document and estimating spreadsheets.
- Assist Corps/EPA Headquarters with special assignments, e.g., Government Property disposition, 5-year Review coordination, technical/quality assurance reviews and Superfund web pages.
- Attend and coordinate Corps participation at National Association of Remedial Project Managers (NARPM) and On-Scene Coordinators (OSC) Readiness Training Program annual training/meetings.
- Represent the Corps at EPA-Superfund sponsored Institutional Controls (IC) Workshops. Identify and discuss various items used to develop, enforce, and monitor IC at project sites.



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

SEP 22 2004

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

OSWER 9355.0-104-1

MEMORANDUM

SUBJECT: Revision to the Memorandum Assigning Corps Administrative Costs to Site-Specific Agreements

FROM: Michael B. Cook, Director *M. B. Cook*
Office of Superfund Remediation and Technology Innovation

Debbie Y. Dietrich, Director *D. Y. Dietrich*
Office of Emergency Management

fm James E. Woolford, Director *J. E. Woolford*
Federal Facilities Restoration and Reuse Office

TO: Superfund National Policy Managers, Regions 1 - 10

Purpose

This memorandum updates OSWER Directive 9355.0-104 requiring the application of a uniform overhead rate to site-specific work performed by the U.S. Army Corps of Engineers (Corps). Effective October 1, the Corps is authorized to begin assigning administrative costs to all site-specific agreement vouchers.

Background

OSWER Directive 9355.0-104 (attached), dated June 30, 2004, explains the purpose for directing the Corps to assign its management and support costs on a uniform basis (as an overhead rate initially set at 2%) to invoices for all individual Interagency Agreements (IAGs) for Superfund remedial, removal, and Federal Facilities projects issued to the Corps. Initial plans to apply the overhead rate to only new IAGs and the increased funding added to existing IAGs after June 30, 2004, proved to be unworkable administratively.

Enclosure 2

Conclusion/Implementation

Beginning October 1, 2004, the Corps is authorized to apply the 2% overhead rate to all invoiced costs for Superfund remedial, removal, and Federal Facilities projects. The 2% overhead rate is to be applied regardless of when an IAG was initially funded or received a funding increase. The intent of this memorandum is to notify approving officials that the 2% cost is appropriate. There will be no need for modification of existing IAGs because of this action.

When new IAGs or amendments to existing IAGs are issued, they should include the 2% charge within the total estimated cost for the project. The 2% charge should have very little effect on existing IAGs; however, additional funds will be provided for an existing IAG if project contingency funding is insufficient to cover this cost. The Corps has been requested to review new IAGs to verify that cost estimates include the 2% charge and existing IAGs to determine if any funding increases by EPA are required.

The subject matter specialist for this document is Ken Skahn, Liaison to the Corps of Engineers for the Superfund program. Ken is in OSRTI and can be reached at (703) 603-8801.

Attachment

cc: OSWER Office Directors
OSRTI Division Directors
OSRTI Regional Coordinators
Art Flaks, OSRTI/BPEB
Susan Bromm, OSRE
Earl Salo, OGC
Nancy Riveland, Superfund Lead Region Coordinator, USEPA Region 9
Eric Steinhaus, Superfund Lead Region Coordinator (FY 2005-2007), USEPA Region 8
NARPM Co-Chairs
Joanna Gibson, OSRTI Documents Coordinator
Patricia Rivers, US Army Corps of Engineers, HQ
Kip Huston, US Army Corps of Engineers, HQ

Business Process for Funding U.S. Environmental Protection Agency (USEPA) Superfund (SF) Program Management and Support (M&S) Activities from Superfund Project Interagency Agreements (IAGs)

1. SCOPE. This business process applies to all USACE elements that support the U.S. Environmental Protection Agency (USEPA) Superfund (SF) Program. It is effective 1 October 2004 and will not expire. This business process replaces existing processes for obtaining SF HQ program-level management and support (M&S) funds and USEPA cost recovery support activity funds for USACE from USEPA. It does not apply to funding for activities other than USACE support to USEPA's SF Program, even if the funding originates from USEPA.

2. BACKGROUND.

a. The USACE provides support to the USEPA SF Program for environmental response actions under the Comprehensive Environmental Response, Compensation and Liability Act. Funds and work assignments are received from USEPA via IAGs. Under current procedures, the USEPA regional offices execute IAGs with USACE districts to assign and fund projects and certain other activities. Headquarters (HQ) USEPA and HQ USACE have previously executed IAGs to provide funding to USACE for M&S activities at HQ USACE; the Major Subordinate Commands; the Hazardous, Toxic and Radioactive Waster Center of Expertise (HTRW-CX) and some districts. HQ USEPA also funded the USACE for cost recovery support.

b. The new business process is prompted by HQ USEPA direction that in the future, USACE obtain M&S and USEPA cost recovery support funds from Superfund project IAGs. This will allow USEPA to capture this funding under their SF cost recovery program, and will eliminate the need for funding these items by IAGs executed at the HQ level as is currently the case.

3. PROCEDURES.

a. Funds for the M&S of the SF Program and for USEPA cost recovery support activities will be provided by the USACE revolving fund established by the Civil Functions Appropriation Act of 1954, Public Law 153, dated 27 July 1953, in accordance with ER 37-2-10. Reimbursements to the revolving fund will be obtained by assessing a charge to all existing and new SF project and/or task IAGs, including site-specific IAGs and site-specific Work Authorization Forms (WAFs) issued from generic IAGs. Any exceptions to this will be determined by HQ USACE and HQ USEPA and will be communicated to affected USACE elements by CEMP-I.

Enclosure 3

b. The M&S charge will be a uniform but adjustable percentage of the IAGs' or WAFs' total monthly expenditures for both revised reimbursable and direct fund cite expenditures. The charge is calculated on the total expenditures, but paid from the revised reimbursable portion of the IAG funding. The IAGs or WAFs to be charged, the rate to be charged and the target level of total funding for each fiscal year will be determined by coordination between the HQ USACE Superfund program management team and HQ USEPA with input from USACE SF support elements that use M&S funds. The rate may be changed at any time, but will be reviewed and coordinated at least once per year in time to communicate any change by 1 October. CEMP-I will request operating M&S budget input from, and communicate any change in the rate to affected USACE elements. When asked by CEMP-I each year, USACE elements requesting M&S funds will submit their budget proposals for the next two fiscal years to HQ USACE for approval. Beginning 1 October 2004, the initial rate will be two percent, and will remain so until changed by CEMP-I.

c. As soon as possible after each change in the rate to be charged, each district with active SF IAGs will coordinate with the USEPA region that issued and manages the IAG to communicate any funding impacts to the Remedial Project Manager, the Response Coordinator, the IAG Project Officer or other appropriate responsible individual. For SF IAG budget estimating purposes, the M&S charge will be included in the "Indirect Cost" budget category on the IAG document. The USEPA letters enclosed with the memorandum transmitting this procedure are HQ USEPA's instruction to their regional offices on this policy. The RPM or other USEPA person responsible for the IAG may authorize USACE to shift funds from the direct fund cite category to the revised reimbursable category from which the charge is paid without amending the IAG by using the *Transfer of Funds Document* provided with instructions at attachment 1.

d. HQUSACE has established a revolving fund account and resource code specifically for SF M&S activities. Effective 1 October 2004, the districts will establish a PR&C for the M&S charge on each of the currently active IAGs. For direct fund cite authority, the charge will be loaded under the reimbursable authority. The accounts will operate like facility accounts. At the end of each month's IAG billing cycle the district will process "Shop and Facility" transactions to assess the authorized percentage fee to the project IAGs and transfer the fee amount to the SF M&S account established at each district. Districts may reduce the effort required by these transactions by using a CEFMS database standard query to be developed by CEHEC-ZC.

e. Effective 1 October 2004, the following must be manually entered as an activity in the P2 project Work Breakdown Structure (WBS) for all active site-specific EPA Superfund Interagency Agreements (IAGs) and site-specific Work Authorization Forms (WAFs) issued from generic IAGs.

Enclosure 3

Activity ID
SFMS000

Activity Name
Superfund Management and Support

Resource Code
SFMSFEE

Work Category Code (WCC)
35500 – OTHER HTRW
96X3122 (Revised Reimbursable)

35500 – OTHER HTRW
68X8145 (Direct Fund Cite)

Effective 1 October 2004, the resource estimate for this activity should be equal to 2% of projected total project costs, which is the sum of direct fund cite and revised reimbursable projected expenditures. This resource estimate must be adjusted to be consistent with any rate change promulgated by CEMP-I under paragraphs 3.b and 3.c.

f. A new Revolving Fund account, RF3920 (Superfund Program Management and Support), and its associated resource code, SFMSFEE, has been established in CEFMS and moved to all production sites. The account will operate like a facility account and will be excluded from the Command Management Review evaluation of the Shop and Facility accounts to avoid distorting the metrics reported. The SF M&S funds, which will be identified by the unique resource code (SFMSFEE), will be linked to P2 by the unique work breakdown structure activity described in paragraph 3e.

g. Within one week after the end of each fiscal quarter, the districts that have collected SF M&S funds will process a reverse 1080 to transfer funds from the SF M&S accounts at the districts to the HQ USACE-level SF M&S revolving fund account.

h. A SF M&S program account manager in CEMP-I, with support from the Superfund program management team, will ensure the total funds assessed for M&S and USEPA cost recovery support activities are sufficient to cover USACE costs, including an appropriate level of contingency. The contingency amount may change, and will be defined during the periodic M&S budget coordination between HQ USACE and HQ USEPA.

i. CEMP-I's SF M&S program account manager will provide expenditure authority to HQ USACE-level elements; MSCs; and the Hazardous, Toxic and Radioactive Waste Center of Expertise or other USACE elements to perform SF M&S and cost recovery activities. When any district is authorized by HQ USACE to perform M&S activities for the SF Program, funds will be provided from HQ USACE to the authorized district. Each USACE element receiving authority to expend SF M&S funds will be responsible for ensuring expenditures do not exceed the budget authority approved by HQ USACE.

Enclosure 3

j. The HQ USACE Superfund program management team (including the chief of the Environmental Community of Practice, the Superfund National Program Manager, and the SF M&S program account manager in CEMP-I) will provide overall management and control of the SF M&S budget and expenses to ensure the USACE revolving fund is fully reimbursed for all sums expensed for SF M&S activities and USEPA cost recovery support activities for the USEPA SF program. Each quarter the HQ USACE-level SF M&S revolving fund status will be monitored and evaluated by the team for needed changes. The HQ USACE Superfund program management team will confer periodically, and no less frequently than annually, with HQ USEPA regarding the scope of activities and total budgeted amount to be used by USACE for the SF Program.

4. TRANSITION PROCESSES AND REQUIREMENTS.

a. HQ USEPA and HQ USACE will continue funding M&S and USEPA cost recovery support in USACE via the existing HQ-level IAG until the new business process using the USACE revolving fund is established and ascertained to be functioning reliably. HQ USACE will continue to fund MSCs and the HTRW-CX via customer orders until the new procedures are fully operational. Then the appropriate HQ IAG(s) will be modified or reissued to retain the scope of services and other relevant requirements, but to revise the procedures for funding the services provided by USACE to USEPA to the new project IAG percentage assessment procedure. The goal is for HQ USEPA to not add new funding to the SF M&S HQ IAGs after fiscal year 2005.

b. CEMP-I will work with the HTRW CX at Omaha District, CERM, CEHEC and CEFC-ZL to pursue modifications to CEFMS that will support more efficiently this new business process.

c. The HQ USACE Superfund program management team will work with the HTRW CX at Omaha District to ensure the availability of program data needed to execute its management and administrative responsibilities.

d. CEMP-I, in coordination with the P2 development and deployment team at HQ USACE and program management team members, will investigate the need to address any additional P2 issues that may relate to this new business process..

e. The HQ USACE Superfund program management team will work with HQ USEPA to continue to resolve issues or concerns at USEPA regions and at USACE elements. If USEPA regions have questions about the HQ USEPA directive, they may contact HQ USEPA's coordinator for this policy, Ken Skahn, at 703-603-8801.

Enclosure 3

**EPA Superfund Program
Instructions for Transfer of Funds Document
Revised Reimbursable and Direct Fund Cite Funding
1 October 2004**

The Transfer of Funds Document is used to transfer funds between the revised reimbursable funding authorization and the direct cite funding authorization for a Superfund Interagency Agreement (IAG), without changing the total amount of IAG funding or issuing an IAG amendment.

- EPA RPM coordinates with USACE PM to verify that the funding amount to be transferred is available.
- EPA region confirms EPA accounting codes with EPA Cincinnati Financial Management Center.
- EPA region completes, signs, and dates Transfer of Funding Document.
- 1st Original - Send to EPA Cincinnati Financial Management Center.
- 2nd Original - Send to USACE, HTRW-CX.
- Transfer of Funds Document must be coordinated with EPA region grants office.
- **Funding transfer amounts must be included in next IAG amendment issued.**
The IAG amendment budget category procurement line (f) must agree with the direct fund cite amount.

NOTES:

The EPA region can also transfer funds between revised reimbursable and direct fund cite by issuing a signed IAG amendment instead of using the Transfer of Funds Document.

All EPA Superfund Management and Support percentage costs are revised reimbursable funded amounts.

Points of contact for questions on completing Transfer of Funds Document:

EPA
Cincinnati Financial Management Center
Jeff Marsala
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