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Environmental Protection Agency Transfer Of Pesticide Laboratories From Beltsville, Maryland, And Washington, D.C., To Cincinnati, Ohio, Should Be Reconsidered

There are three factors to be considered in the move: safety conditions, cost factors, and programmatic effects. The Agency has concluded that, because of safety and economic factors, the move is warranted. GAO's review has shown that the plan involves moving from unsafe buildings to unsafe buildings; the available cost data indicates the proposed move would be uneconomical and that the pesticide laboratories' work would be disrupted from 2 to 5 years.

**BY THE COMPTROLLER GENERAL
OF THE UNITED STATES**

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JULY 1, 1975

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

5-183144

The Honorable Gladys Noon Spellman
House of Representatives

Dear Mrs. Spellman:

This report is in response to your March 24, 1975, request that we investigate the Environmental Protection Agency's proposed transfer of pesticide laboratories from Beltsville, Maryland, to Cincinnati, Ohio. As your office agreed, we have also investigated the proposed transfer of pesticide laboratories from Washington, D.C., because these laboratories are scheduled to be transferred to Cincinnati with the Beltsville laboratories.

We met with Agency officials to obtain their oral comments on our findings, and we have recognized these comments, to the extent appropriate, in finalizing this report.

2 5 We are sending copies of this report to the Senate and House Committees on Government Operations and Appropriations and to the Environmental Protection Agency. <1550 < 2000

Sincerely yours,

Comptroller General
of the United States

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ABBREVIATIONS

EPA Environmental Protection Agency
FDA Food and Drug Administration
GAO General Accounting Office
INA Insurance Company of North America
OPP Office of Pesticide Programs
OSHA Occupational Safety and Health Administration
USDA U.S. Department of Agriculture

COMPTROLLER GENERAL'S
REPORT TO THE HONORABLE
GLADYS NOON SPELLMAN
HOUSE OF REPRESENTATIVES

ENVIRONMENTAL PROTECTION AGENCY
TRANSFER OF PESTICIDE
LABORATORIES FROM BELTSVILLE,
MARYLAND, AND WASHINGTON, D.C.,
TO CINCINNATI, OHIO, SHOULD BE
RECONSIDERED

D I G E S T

The Environmental Protection Agency proposed transferring four of its pesticide laboratories--two at Beltsville and two in Washington--to the Taft Center in Cincinnati. The transfer, involving 30 positions, is scheduled for completion by September 1 of this year.

The Agency's reason for moving the Beltsville laboratories is that the buildings in which they are housed have major safety deficiencies. Justification for transfer of the Washington laboratories is not entirely clear, although the Agency has questioned the building's safety.

Three factors were considered: safety, cost, and programmatic effects. The planned move involves the transfer from buildings in the Washington-Beltsville area that do not, according to the Agency and a private insurance contractor, meet structural safety standards for high-hazard laboratory operations to buildings in the Cincinnati area that, the Agency and its contractor said, have the same type of problem.

The Department of Agriculture, which owns and operates the Beltsville Federal facility, told GAO that it considered the building cited by the Agency as having major safety deficiencies to be one of its safest in the Beltsville complex. In fact, Agriculture employees occupy most of this building, including many high-hazard laboratories. The justification for the move on the basis of safety is not convincing.

The Agency has given Members of Congress cost information on the various alternatives involved if the laboratories stay in Beltsville or if they transfer to Cincinnati, as proposed. It has concluded that the economic factors, along with the safety factors, indicate a move is warranted.

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Cost information available does not support this contention. Some of the cost factors included were erroneous, some were highly questionable, and others were not considered. The cost factors provided indicate that a cost savings would result from staying at Beltsville and modifying the existing buildings. The Agency had not made a complete and valid cost analysis of the proposed move.

It appears that the programmatic results of such a move will adversely affect the pesticide laboratories involved and possibly the Agency's entire pesticide program. GAO questioned affected employees and determined that only a few of these highly qualified employees planned to move to Cincinnati.

An Agency official said that two particular employees who would not transfer could never be replaced because they are world-reknown specialists in their fields. According to Agency officials, there will be a 2- to 5-year disruption in the effectiveness and efficiency of the laboratory work because of the disruption of experiments and the time needed to train persons recruited to fill vacancies resulting from the move.

In all, the proposed transfer does not appear to be justified in view of the program disruptions and expenses which will result.

The proposed transfer has not been properly planned or coordinated. There is a serious lack of communications between the employees potentially scheduled to move, headquarters officials in Washington administratively involved in the plan, and Agency officials in Cincinnati administratively involved.

The Acting Director of the Agency's Facilities and Support Services Division, after reviewing GAO's cost analysis, told GAO that the transfer from Beltsville and Washington to Cincinnati could not be justified on the basis of economy. (See p. 34.)

RECOMMENDATIONS

On the basis of the economic, safety, and programmatic reasons discussed in this report, GAO recommends that the Administrator of the Agency reconsider the proposed laboratory transfer. Concerning the Agency-owned Taft Center in Cincinnati, GAO recommends that the Administrator of the Agency require the Director of his Facilities and Support Services Division to explore the possibility of turning the Center over to the Food and Drug Administration, because the Administration has indicated that it could use the entire Center.

CHAPTER I

INTRODUCTION

At the request of Representative Gladys Noon Spellman (see app. I), we reviewed the circumstances surrounding the proposed transfer of certain Environmental Protection Agency (EPA) laboratories located in U.S. Department of Agriculture (USDA)-owned space at the Agricultural Research Center, Beltsville, Maryland, and Washington, D.C., to EPA-owned facilities in Cincinnati, Ohio. The proposed transfer of these laboratories, which are organizationally located in EPA's Office of Pesticide Programs (OPP), is to be completed by September 1, 1975, and involves the following laboratories and positions.

<u>Laboratory</u>	<u>Location</u>	<u>Positions involved in the proposed move</u>
Analytical Chemistry	Beltsville	14
Microbiology	Beltsville	10
Reference Standards	Washington	3
Special Investigations	Washington	<u>3</u>
Total		<u>30</u>

EPA exercises the principal regulatory and research functions of the Federal Government over pesticides. This responsibility was transferred principally from USDA, along with the responsible organizational elements, to EPA on December 2, 1970, pursuant to Reorganization Plan No. 3 of 1970, which established EPA.

OFFICE OF PESTICIDE PROGRAMS

OPP is responsible for EPA's pesticide activities. Through its four divisions--Registration, Technical Services, Criteria and Evaluation, and Operations--OPP develops and carries out plans and programs to regulate pesticides.

There were four laboratories involved in the move at the time of our review. The Technical Services Division is responsible for the Microbiology and Analytical Chemistry Laboratories which are located in Beltsville, and the Registration Division is responsible for the Special Investigations and Reference Standards Laboratories which are located in Washington.

Registration Division

This division is responsible for registering all pesticides so as to insure human safety and protection of environmental quality and for establishing tolerances for pesticide residues in or on food and foodstuffs. The division also identifies the need for new standards and guidelines applicable to the registration process. The three laboratories the division operates are all located in USDA's South Agriculture Building in Washington.

<u>Laboratory</u>	<u>Function</u>
Special Investigations (note a)	Makes short-term investigations of questions of pesticide residues for which tolerances have been set. These investigations are the basis for any remedial action.
Reference Standards (note a)	Develops, maintains, and distributes pesticides-testing criteria and determines the purity of pesticide samples submitted.
Analytical Methods	Makes laboratory trials to validate and informally approve the methods for obtaining various pesticides.

^aScheduled to be transferred to Cincinnati.

Technical Services Division

This division is responsible for providing technical data and information on pesticides to other divisions in OPP and to outside groups. In its monitoring program it assesses pesticide residues in air, water, soil, crops, livestock, and aquatic and land animals and the effects on humans of exposure to pesticides. It also develops scientific publications related to the pesticides program and develops and maintains testing criteria for pesticides to support EPA's research and regulatory activities. According to the chief of the division's laboratories, no other Federal or State laboratories are doing the same types of laboratory work as the division's laboratories. The nine laboratories the division operates are:

<u>Laboratory</u>	<u>Function</u>	<u>Location</u>
Analytical Chemistry (note a)	Collects, characterizes, and distributes chemistry reference standards. Makes chemical investigations of problems and emergencies.	Beltsville
Animal Biology	Evaluates products used as rodenticides, animal repellents, and other animal control agents.	Beltsville
Ecological Monitoring	Monitors the effects of pesticides on air, water, animals, plants, and other natural resources.	Bay St. Louis, Mississippi
Entomology	Evaluates pesticide formulations used for controlling insects.	Beltsville
Microbiology (note a)	Evaluates products to be used as germicides, disinfectants, sterilizers, sanitizers, sporocides, fungicides, and bacteriostat agents, for application to inanimate materials or surfaces	Beltsville
Northwest Biological Investigations	Develops standard biological-testing procedures for use as guidelines for pesticide registrants. Evaluates the effectiveness of pesticide products and devices. This laboratory's activities are devoted primarily to pesticide uses unique to the Northwest.	Corvallis, Oregon

^aScheduled to be transferred to Cincinnati.

<u>Laboratory</u>	<u>Function</u>	<u>Location</u>
Pharmacology	Evaluates economic poisons to determine their safety when used on animals or in the environment of humans and animals.	Beltsville
Plant Biology	Evaluates pesticide products for biological activity to determine what effect they have on plants.	Beltsville
Product Analysis	Determines that the active ingredients in a product conform to the statements on the label.	Bay St. Louis

EPA's New York, Denver, and San Francisco regional offices operate three other laboratories which are not in OPP but which are directly involved in the pesticide area. All three of these laboratories are product analysis laboratories similar to the laboratory in Bay St. Louis.

Descriptions of the Beltsville facilities currently housing the laboratories involved in the proposed transfer follow.

- Building 225. This one-story masonry and frame structure, which USDA owns and leases to EPA, houses EPA's Pharmacology Laboratory. The building has approximately 2,430 square feet of space which is used almost entirely for laboratory space.
- Building 306. USDA owns this three-story masonry structure. EPA leases half of the first floor and one laboratory on the third floor for its Analytical Chemistry Laboratory. The EPA-occupied space in this building is approximately 4,700 square feet and is used almost entirely for laboratory space.
- Building 406. This one-story masonry structure has three wings which are interconnected by short passageways. USDA owns the building and leases it to EPA for its Microbiology Laboratory. The building has approximately 3,630 square feet of space which is used almost entirely for laboratory space.

A description of another building at Beltsville which EPA is considering as an alternative location for one of the affected laboratories follows.

--Building 409. USDA owns the one-story masonry structure and leases it to EPA. The building has approximately 1,700 square feet of space which EPA currently uses for storage.

Descriptions of the proposed facilities in Cincinnati to which the affected laboratories could be transferred follow.

--The Taft Center. The four-story brick structure, owned by EPA, presently holds 250 people but has a capacity of 400 people; 75 percent of the building is laboratory space and 25 percent is office space.

--The Ridge Avenue facility. The one-story brick structure is privately owned and is leased to EPA (through the General Services Administration). The building presently holds approximately 260 people but has a capacity of 350 to 400 people; 60 percent of the building is laboratory space and 40 percent is office space.

--The new EPA facility. The seven-story masonry structure is being constructed for EPA to house most of EPA's employees now in Cincinnati. The building, which is scheduled for completion by September 15, 1975, will hold approximately 600 people; 60 percent of the building will be laboratory space and 40 percent will be office space.

SCOPE OF REVIEW

We made our review at EPA's Washington headquarters, the laboratories in Beltsville and Washington, and the proposed laboratory locations in Cincinnati. We sent questionnaires to the affected employees to determine the impact of the proposed transfer on their personal and professional lives.

We examined the costs of refurbishing the existing facilities; the costs of relocating the employees; and the cost saving, if any, resulting from the transfer. We also analyzed EPA's justification for the transfer, the disruption of the programs of the laboratories in question, the impact on other U.S. Government agencies and private corporations, the condition of available facilities in Cincinnati, and the planned use of the vacated space.

We reviewed pertinent documentation and discussed the impact of the proposed transfer with appropriate officials in EPA, USDA, and the Food and Drug Administration.

CHAPTER 2

EPA'S JUSTIFICATION FOR THE PROPOSED MOVE IS QUESTIONABLE

EPA has justified the proposed move to Cincinnati on the basis that such a move will be economical and will provide the laboratories with safe facilities.

Studies by both EPA and a contractor EPA hired have concluded that the Beltsville facilities housing two of OPP's laboratories are unsafe but that the space to which EPA plans to transfer the laboratories in Cincinnati also is unsafe.

EPA based its conclusion that the move will be economical on data that was either questionable or incorrect.

REPLACING UNSAFE FACILITIES IN BELTSVILLE AND WASHINGTON WITH UNSAFE FACILITIES IN CINCINNATI

EPA's laboratory plans

The fiscal year 1972 Agriculture-Environmental and Consumer Protection Subcommittee report of the House Committee on Appropriations directed the Administrator of EPA to develop a laboratory plan responsive to its environmental mission, stressing consolidation of EPA activities. The plan, called the 1972 laboratory plan, was issued in November 1972 and concluded, among other things, that:

- Each EPA region should be provided with safe laboratory facilities adequate to meet immediate needs as well as future program growth.
- EPA research laboratories should be consolidated on a programmatic basis, to concentrate scientific capabilities in a minimum number of locations.
- A National Environmental Pesticide Center should be established at its test facility at Bay St. Louis.

The plan concluded that the Beltsville laboratories should be transferred to the proposed National Environmental Pesticide Center. It also recommended that the laboratories located in the South Agriculture Building be transferred to a "suitable interim location in the Washington, D.C., area." An official of EPA's Facilities and Support Services

Division told us that there were no long-range plans for where the South Agriculture Building laboratories would be permanently located.

In 1974 EPA reevaluated the 1972 laboratory plan and prepared a revised plan for using available space instead of budgeting for new construction or major improvements to existing facilities. This plan, issued in March 1974, reaffirmed the conclusions of the 1972 laboratory plan that

- each EPA region should be provided with safe and adequate laboratory facilities to meet immediate needs as well as future program growth and
- EPA's research laboratories should be consolidated on a programmatic basis to concentrate scientific capabilities in a minimum number of locations.

The 1974 laboratory plan also concluded that EPA should give priority to modifying or replacing existing laboratory facilities to bring all EPA laboratory facilities in compliance with Occupational Safety and Health Administration (OSHA) and EPA safety standards.

The conclusion reached in the 1972 laboratory plan calling for establishing a National Environmental Pesticide Center in Bay St. Louis was deleted in the 1974 laboratory plan. The 1974 laboratory plan directed that the Beltsville site be retained because of ongoing pesticides programs tied to existing agricultural plots and orchards at Beltsville but that the Chemistry and Microbiology Laboratories' activities, which are not geographically dependent on their location, be transferred to safe and adequate space to be made available in EPA-owned facilities in Cincinnati.

According to the plan two of the Beltsville buildings occupied by EPA, housing the Pharmacology and Chemistry Laboratories, did not structurally meet OSHA and EPA safety standards for high-hazard laboratory operations. However, because it was determined that pharmacology was tied programatically to its present location, it was decided to move the Pharmacology Laboratory into the building housing the Microbiology Laboratory and move the Microbiology Laboratory to Cincinnati. Also the USDA South Agriculture Building did not meet OSHA and EPA safety standards for high-hazard laboratory operations. Therefore the plan concluded that the South Agriculture Building laboratories should be transferred into EPA-owned facilities in Cincinnati.

Studies by both EPA and its contractor have concluded however, that both the Beltsville and the proposed facilities in Cincinnati are unsafe.

Safety studies

Between December 1970 and the fall of 1973, EPA's Safety Management Office and Facilities Management Branch made 56 safety surveys of various EPA-occupied facilities, including those at Beltsville, the South Agriculture Building, and the proposed locations in Cincinnati where the laboratories were to be transferred. These surveys were to evaluate the total adequacy of the facilities and identify any serious safety problems that needed immediate attention.

On the basis of serious deficiencies EPA discovered in these surveys, it was decided to let a contract to the Insurance Company of North America (INA) to evaluate the safety of all EPA facilities for:

"* * * assessing total compliance with the standards of The Occupational Safety and Health Act * * * of 1970 as per October 18, 1972 including all applicable revisions and all applicable provisions of other standards and requirements cited in * * * [the act], as well as the National Building Code, 1967 Edition, recommended by the American Insurance Association."

EPA's Safety Officer at the time this contract was awarded told us that EPA had contracted for the safety review because EPA did not have the manpower to undertake such a large task--reviewing almost 100 buildings. This contract, costing about \$187,500, was awarded on June 29, 1973.

Safety deficiencies identified by EPA
and INA safety surveys of Beltsville,
Washington, and Cincinnati facilities

Beltsville

EPA survey on
April 14 and 17, 1972

Building 306, Chemistry
Laboratory:

Lacked a sprinkler
system
Ventilation system
inadequate

Building 225, Pharmacology
Laboratory:

Ventilation system
inadequate
Lacked a fire-alarm
device

Building 406, Microbiology
Laboratory:

Ventilation system
inadequate
Fire-alarm device not
present

INA survey on
April 8 and 9, 1974

Building 306, Chemistry
Laboratory, did not
meet:

Fire-resistive
standards
Exit requirements
Ventilation standards

Building 225, Pharmacology
Laboratory, did not meet:

Construction standards
Exit requirements
Ventilation standards

Building 406, Microbiology
Laboratory, did not meet:

Fire-resistive
standards
Exit requirements
Ventilation standards

Officials of USDA, the agency which owns and operates the Beltsville facilities EPA occupies, told us that they considered building 306--the building occupied by EPA's Analytical Chemistry Laboratory and considered by EPA as the most unsafe--one of the safest facilities of the Beltsville complex.

Although USDA officials feel there are minor safety deficiencies in the buildings in question, they do not feel the building (building 306) is unsafe for high-hazard laboratory work. USDA has high-hazard laboratories in building 306.

According to a USDA official, if EPA vacates the buildings at Beltsville, which it identified as unsafe, USDA will place some of its laboratories in the vacated space; however, USDA has no plans for major refurbishing of any of the buildings.

South Agriculture Building

EPA survey on
April 10, 1972

Lacked an automatic fire
suppression system
Ventilation system
inadequate

INA survey in January 1974

Room ventilation inadequate
Fire-resistive construction
inadequate
No automatic fire extin-
guishing systems
No warning alarm
Laboratory doors did not
meet safety standards

According to OPP officials, the safety problems EPA and INA identified in the South Agriculture Building appear to be less serious than originally reported in the studies. USDA's Facilities staff told EPA that the safety deficiencies identified in these facilities could be corrected with a minimum of expense.

Cincinnati locations where laboratories
are to be located

EPA is considering two existing facilities in Cincinnati--the Taft Center and the Ridge Avenue facility--as possible locations to house the laboratories. EPA also considered another facility, to be completed in September 1975, as a possible location for the laboratories. Facilities and Support Services Division officials decided that the laboratories would be temporarily located in the Ridge Avenue facility and eventually moved permanently to the Taft Center.

Both EPA and INA conducted safety surveys for these two locations as discussed below.

EPA

Officials of EPA's Facilities and Support Services Division told us they made safety surveys on the Cincinnati locations on the following dates.

Taft Center	7/21/71
	6/16/72
Ridge Avenue	7/27/71
	6/ 2/72

EPA was unable to provide us with copies of these surveys. A former EPA Safety Officer who made the surveys told us that the EPA surveys disclosed deficiencies similar to those INA identified.

INA

Taft Center--Survey made between August 27 and September 11, 1973:

Fire-resistive standards inadequate. Doors open inward, therefore not allowing fast egress. Sprinkler system only in basement. Ventilation system inadequate.

Conclusion: "Taft would require moderately extensive changes to the heating, ventilation, and air conditioning system and specific physical structure modifications for the purpose of improving fire resistivity, fire extinguishment and control, and life safety."

Ridge Avenue facility:

Ventilation system inadequate. No automatic, remote alarm system.

Conclusion: "To qualify this structure for continued use as a high-hazard occupancy would require major structural changes. It would not be economically feasible to modify this structure."

EPA'S DECISION TO MOVE TO CINCINNATI
BASED ON QUESTIONABLE DATA

EPA officials have identified three possible alternatives to the Cincinnati move, which would result in the subject Beltsville laboratories' remaining in their present location.

- Constructing a new laboratory building in Beltsville which would house both the Analytical Chemistry and the Pharmacology Laboratories. The Microbiology Laboratory would remain at its present location.
- Renovating building 225, which houses the Pharmacology Laboratory, and constructing an addition to existing storage building 409, which would house the entire Analytical Chemistry Laboratory. The Microbiology Laboratory would remain at its present location.
- Modifying both building 306, which currently houses the Analytical Chemistry Laboratory, and building 225. The Microbiology Laboratory would remain at its present location.

EPA officials identified three options for housing the laboratories in Cincinnati.

- Move into the existing EPA-owned Taft Center. The Taft Center is to be vacated when the people now there move to a new facility (as yet unnamed) in September 1975.
- Modify rooms in the new Cincinnati laboratory and move to that location.
- Move into already modified laboratory space in the new Cincinnati laboratory.

In a letter to Representative Spellman, dated March 4, 1975 (see app. II), EPA concluded that the Cincinnati options were the most economical and said that it was in the process of determining "the best specific location in Cincinnati for the pesticides programs."

Some of the cost data EPA considered in deciding which alternative was the most economical was questionable or incorrect.

Beltsville alternatives

The alternatives and costs stated in the March 4, 1975, letter (see app. II) were as follows:

Construction of new laboratory building	\$1,500,000
Modification of buildings 225 and 409	550,000
Modification of building 306	1,000,000

At our request, EPA provided us with more detailed cost analysis on the various alternatives, as follows:

Option 1--Construction of new building:

Design, construct, and equip 15,000 square feet at \$100 a square foot	\$1,500,000
Move into new building	<u>10,000</u>
Total	<u>\$1,510,000</u>

Option 2--Modifications of buildings 225 and 409:

Renovate building 225 2,000 square feet at \$25 a square foot	\$ 50,000
Modify and equip building 409 1,700 square feet at \$25 a square foot	45,000
Construct and equip addition to building 409, 2,800 square feet at \$100 a square foot	280,000
Move into building 409	10,000
Reimburse USDA for use of facilities	<u>165,000</u>
Total	<u>\$550,000</u>

Option 3--Modification of building 306:

Renovate existing building ventilation system, 30,000 square feet at \$25 a square foot	\$ 750,000
Modify building for improved fire protection and egress	105,000
Reimburse USDA for use of facilities	<u>165,000</u>
Total	<u>\$1,020,000</u>

We examined these cost estimates in detail.

Option 1--Construction of new building

The \$1.5 million includes \$100,000 already appropriated by the Congress and spent for design of this facility. With this \$100,000 deducted, the cost is actually \$1.4 million, or about \$93.33 a square foot.

EPA Facilities and Support Services Division officials told us that \$100 a square foot was an educated guess. We contacted USDA officials for an estimate of the cost to build such a building. The estimates ranged from \$40 a square foot to \$80 a square foot. Thus the Federal agency--USDA--that owns and operates the Beltsville site estimates that the cost would be between \$600,000 and \$1.2 million. USDA officials told us that EPA had not contacted them for their estimates.

Therefore, if the estimate of \$93.33 a square foot is correct, the maximum cost of this facility would be about \$1.4 million; if the USDA estimate of \$40 a square foot is accurate, the facility could cost as little as \$600,000.

Option 2--Modifications of buildings 225 and 409

The same question is raised here as was raised about the \$100 a-square-foot estimate--possible deduction of 20 percent to 60 percent of the cost. EPA estimated \$280,000 for the 2,800-square-foot addition to building 409; USDA estimated between \$112,000 and \$224,000.

Since the \$165,000 includes the EPA costs for using all the facilities at Beltsville, only that which is allocated to the Chemistry and Pharmacology Laboratories should be included here. The Chemistry and Pharmacology Laboratories' part of the \$165,000 is approximately \$59,000; therefore the difference between these two figures (\$106,000) should be subtracted from the cost of this option.

Thus EPA's cost estimate of \$550,000 is questionable. Based on data provided to us, perhaps a more realistic estimate would be between \$276,000 and \$388,000. Therefore, if the estimate of \$93.33 a square foot is accurate, the maximum cost of this option would be \$425,000; if the USDA estimate of \$40 a square foot is accurate, the cost of this option could be as low as \$276,000.

Option 3--Modification of building 306

INA estimated that the total cost for correcting deficiencies it identified for this building would be \$105,000. However, EPA's Safety Officer told us he did not believe INA had done an adequate job in its safety survey of this building. He said that the \$1,020,000 estimate was his educated guess, based on his knowledge of the facility.

Again, the \$165,000 cost for the use of facilities should be only that which is assigned to the Chemistry Laboratory, which is \$40,000, or \$125,000 less than the \$165,000. Therefore, the maximum cost of this option is the EPA estimate based on an educated guess of \$1,020,000, less the \$125,000. If the INA estimate is correct, this option could cost as little as \$145,000.

Cincinnati alternatives

In its March 4, 1975, letter, EPA also provided cost estimates of the three alternatives in the Cincinnati area where the Chemistry and Microbiology Laboratories could be transferred, as follows:

Modifying rooms of the existing Taft Center and moving to that location	\$345,000 to \$507,000
Modifying the new Cincinnati laboratory and moving to that location	\$275,000 to \$437,000
Moving into already equipped laboratory space in the new building	\$45,000 to \$207,000

The above three estimates included costs of moving some equipment from Beltsville and of moving employees. EPA explained these costs as follows:

"These data provide for moving some equipment from Beltsville and for costs of employee moves. For example, the range of \$45,000 to \$207,000 is indicated because the actual number of employees to relocate is unknown and entitlement to relocation costs will vary. If all employees move, and all are home owners receiving maximum reimbursement for real estate settlement costs, the high figure will be close. If one-half move, and receive average cost reimbursement based on our experience, then the low figure will be close."

As we did for the Beltsville options, we asked EPA to give us a more detailed cost analysis of the various alternatives, which is as follows:

Move into the existing Taft Center:

Renovate existing building
ventilation system, 15,000
square feet at \$20 a square
foot--\$300,000

Move employees and special
equipment from Beltsville to
Cincinnati:

11 persons at estimated minimum
relocation costs--\$45,000
21 persons at estimated maximum
relocation costs--\$207,000

Total \$345,000 to \$507,000

Move into unequipped space in new
laboratory building:

Furnish and install laboratory
equipment in 15,000 square
feet of unequipped space--
\$230,000

Move employees and special
equipment from Beltsville to
Cincinnati:

11 persons at estimated minimum
relocation costs--\$45,000
21 persons at estimated maximum
relocation costs--\$207,000

Total \$275,000 to \$437,000

Move into equipped space in new
laboratory building:

Move employees and special
equipment from Beltsville to
Cincinnati:

11 persons at estimated minimum
relocation costs--\$45,000
21 persons at estimated maximum
relocation costs--\$207,000

Total \$45,000 to \$207,000

EPA has decided to move the laboratories into the existing Taft Center. We analyzed that option's costs.

Taft Center

INA estimated the cost to correct the ventilation system deficiencies at the Taft Center to be \$3.4 million and the total cost to correct all the deficiencies to be about \$4.4 million. EPA officials told us they thought INA was much too strict in its criticism of the Taft Center. Facilities and Support Services Division officials told us they felt a more realistic figure would be \$300,000 for each floor to correct the ventilation system plus \$62,000 for each floor to correct other deficiencies (or a total cost of \$1,448,000 for four floors) which had not been included in the March 4, 1975, letter.

These officials also estimated that the Beltsville people would occupy 1-1/2 floors of the Taft Center. Therefore the total cost to refurbish this area will be about \$543,000, or \$243,000 more than the EPA estimate. They said that the employees from the Washington, D.C., laboratories would need about half a floor. Therefore the total cost to renovate the Taft Center will be about \$724,000.

EPA officials have told us that they were not satisfied with the INA survey studies completed in either Beltsville or Cincinnati. They thought the INA estimates of the costs to refurbish the Beltsville facilities too low and the Cincinnati estimates too high. As noted above, however, the best estimates that EPA could give us in some instances were "educated guesses" or were incomplete. In addition, we noted that two of the three people making the INA evaluations in both locations were the same people, INA's fire protection specialist and its industrial hygiene consultant. It seems unlikely that these two people would have erred in such opposite directions.

Additional costs not considered by EPA

Many costs which would be incurred if the proposed transfer takes place have not been developed and therefore could not have been considered by EPA management. Examples of such costs not developed are the costs of recruiting and training persons to fill expected vacancies, purchasing equipment necessary because of the transfer, and contracting out to private laboratories to complete necessary research which EPA would not be able to complete because of vacancies.

Recruiting and training

EPA officials informed us that very few employees, mainly chemists, planned to move to Cincinnati. Officials in OPP did not have cost data for recruiting and training chemists needed to fill vacancies caused by the move. According to both EPA and USDA, it can take from 2 to 5 years to train a chemist to do the type of work being done by EPA chemists at Beltsville and in the South Agriculture Building.

Equipment costs

At the time of our review, EPA had not determined what equipment might be transferred to Cincinnati. Because the laboratories at Beltsville and the South Agriculture Building have interfaced for so long on an almost daily basis with other EPA laboratories in the same general location, officials in the laboratories have told us they have shared each other's equipment so much that it is impossible, in some cases, to determine what equipment should stay and what should be transferred to Cincinnati. However, EPA officials told us that if the move was made EPA would have to duplicate some of its most expensive equipment which must stay in the remaining Beltsville and Washington laboratories.

We were unable to determine what equipment must be purchased in Cincinnati, if the move is made; however, EPA officials told us that the value of the major laboratory equipment--excluding such items as glassware and small laboratory implements--to be transferred was about \$650,000. EPA officials said that an unknown part of this equipment would have to be purchased if the move was made.

Contracting

If, as expected, many of the current laboratory employees do not choose to transfer to Cincinnati, EPA will still have the laboratory functions but not the experienced employees to do the work. Because of these vacancies and the lack of experienced employees to fill them, EPA officials have said on many occasions that it will be necessary for EPA to contract out with private laboratories for the necessary tests and analyses. EPA could not estimate the extent or costs of these services.

CHAPTER 3

POSSIBLE ADVERSE EFFECTS OF THE PROPOSED LABORATORY MOVE

The proposed transfer could result in the loss of uniquely qualified staff and could adversely affect other Government agencies and other organizations that routinely deal with EPA's pesticide laboratories.

LOSS OF UNIQUELY QUALIFIED STAFF

According to EPA's plan, 30 of the 32 laboratory positions are to be transferred to Cincinnati. At the time of our review, EPA had not identified the 2 positions which were not to be transferred. Also EPA had not tried to determine how many of the 32 employees occupying those positions were planning to transfer to Cincinnati. In fact, before our review 11 of the 32 affected employees were not even aware that a move was to take place.

We sent these 32 employees a questionnaire to determine what effects the transfer would have on their personal and professional lives. Some of the questions and answers were:

Do you plan to move?

Definite yes	5
Definite no	6
No, if I can find job in pesticides area	6
No, if I can find job in any field	12
Undecided	3

Do you feel you are working in unsafe conditions?

Yes	4
No	25
Unanswered	3

Will EPA experience difficulty in replacing those who do not transfer?

Yes	25
No	5
Unknown	2

Will move cause setback in the work of laboratories?

Yes	26
No	4
Unknown	2

Does the D.C. area have pesticide work-related advantages over Cincinnati?

Yes	26
No	4
Unknown	2

The questionnaires returned to us showed that only a few of the employees planned to transfer to Cincinnati; only one of the supervisors planned to transfer. At the Beltsville laboratories alone, this could result in a loss to EPA of employees having a total of over 100 years' experience in the pesticide area.

The Director, Technical Services Division, said that two employees who he was sure would not transfer could never be replaced because they are world-reknown specialists in their fields.

According to estimates division officials gave us, there will be at least a 2- to 5-year disruption in the effectiveness and efficiency of the laboratory work because of the time needed to train persons recruited to fill vacancies resulting from the move. The Director of USDA's Agriculture Pesticide Degradation Laboratory in Beltsville substantiated this estimate.

EFFECTS OF MOVE ON OTHER GOVERNMENT AGENCIES AND OTHER ORGANIZATIONS

Various Government officials familiar with pesticide work have told us that the Washington, D.C., area is known as the "pesticide capital of the world." The reasons given were that laws concerning the regulation of pesticides are conceived and developed here; many of the major pesticide manufacturers have their main offices, or at least branch offices, here; and other Government agencies, such as USDA and the Food and Drug Administration (FDA), have their laboratories with pesticide expertise here.

The Director of USDA's Pesticide Degradation Laboratory told us that the transfer would be detrimental to EPA's and USDA's joint efforts. (See app. III for a list of cooperative efforts of the two agencies.)

Two private organizations have expressed concern about the effects of the proposed transfer. In a letter dated March 12, 1975, the National Agricultural Chemicals Association told EPA's Assistant Administrator for Water and Hazardous Materials that it was:

"* * * concerned when research areas of importance to our Industry begin to be affected, and particularly when they seem to be in danger of being dissipated. If safety is the primary concern it seems to me that it would be wise to study the cost factor of making the present laboratories safe vs. the cost involved in moving the laboratories and the people to Cincinnati."

In a letter to the same EPA Assistant Administrator dated February 11, 1975, the Association of American Pesticide Control Officials said that:

"* * * such action [the transfer] would very likely disrupt to some extent, or at least render more difficult our cooperative efforts."

This organization was concerned because, at its 1974 convention, the following agreements were reached.

- The Beltsville chemistry laboratory would complete a new chemists' manual which would specify chemical methods of analyses for commercial pesticide formulations.
- EPA and State chemists of the association would establish a training program which would be administered by the Chemistry Laboratory.
- The Chemistry Laboratory would assist State laboratories in analyzing certain formulations where there were contested actions.
- The Chemistry Laboratory would supply pesticides standards to be used in formulation analyses.

Officials of the Technical Services Division have told us that, if the transfer takes place, the cooperative efforts discussed above could be set back by as much as 20 months.

In closing, the association told EPA that:

"The location of a laboratory in the Washington, D.C. area has certain advantages such as ready accessibility to scientists and facilities of other federal laboratories. Likewise, should a problem outside the scope of EPA be submitted by a state, in most cases referral to the proper laboratory (USDA, FDA, DI [Department of the Interior]) can be accomplished with a minimum of difficulty and delay. This is most helpful to the state seeking assistance."

We noted that, in at least one instance, EPA and another Federal agency were experiencing problems that could be compounded by the move. On February 10, 1975, EPA's Registration Division received a letter from FDA concerning "a potentially serious problem FDA has been encountering with the pesticide reference standards." The pesticide reference standards were submitted to FDA by OPP's Reference Standards Laboratory located in the South Agriculture Building. The letter further stated that:

"The problem concerns the difficulties several FDA laboratories have been experiencing with these standards. For example, some of the reference standards that are received from EPA are five years old and their exact purity and composition are either not known or very questionable. In other instances, we have been asked to restrain our request for new standards or for replacements of out-of-date standards."

An official in EPA's Registration Division told us that the transfer would increase the problems identified in the FDA letter.

The Director of the Reference Standards Laboratory told us that in the past he had furnished standards to various embassies of foreign nations which are located in Washington, D.C. He told us that a transfer to Cincinnati would be detrimental to the rapport he had developed with representatives from these foreign countries.

CHAPTER 4

LACK OF COMMUNICATION BETWEEN CINCINNATI AND HEADQUARTERS ON THE PROPOSED MOVE

We visited the Cincinnati facilities and interviewed various responsible EPA officials in the Cincinnati area and found that the transfer had not been properly coordinated between EPA headquarters and Cincinnati. The following comparison of opinions of key Washington and Cincinnati officials about various aspects of the transfer illustrates the lack of communication.

<u>Issue</u>	<u>Washington understanding</u>	<u>Cincinnati understanding</u>
Reason or justification for transfer.	Safety; definitely not programmatic	Programmatic consolidation of pesticide laboratory program in accordance with laboratory plan; no idea that not all employees in laboratories are going to transfer, if move is made.
Filing of vacancies caused by move-- at present only 5 of the 30 employees plan to move.	Acting Administrative Officer, Office of Pesticide Programs, has said no problem filling vacancies by using National Field Investigations Center employees.	Director, National Field Investigations Center, is dubious about his employees' adequately filling vacancies. At the time we discussed this with him, EPA had not asked him for such data.

<u>Issue</u>	<u>Washington understanding</u>	<u>Cincinnati understanding</u>
Planned interim move to a temporary location at the Ridge Avenue facility until the Taft Center is refurbished.	Acting Administrative Officer is planning on placing the laboratories in the Ridge Avenue facility from September 1975 until at least January 1976.	Director of Administration was unaware of proposed interim move. He said it would further disrupt the program. The Chief, Facilities Management Services, told us the Ridge Avenue facility's lease would expire in September and there were no plans to renew it.
What is to happen to the Taft Center facility? When the new facility is complete, EPA plans to move virtually all employees now in the Taft Center to the new facility.	Acting Director, Facilities and Support Services Division, says only a small number of EPA employees (80) will be housed there.	Director of Administration wants to fill the building with EPA employees and possibly some FDA employees. (FDA has expressed desire to fill the entire building.)
Costs of refurbishing Taft Center	Acting Director, Facilities and Support Services Division, has given us an estimate of \$362,000 a floor, although Washington officials have not examined the facility.	Facilities Management, Cincinnati, has no idea of the cost, would not give an estimate, and has no idea when work will be complete. It plans to hire an architect to determine what has to be done to the Taft Center to make it safe for high-hazard laboratory operations.

Perhaps the largest area of confusion within EPA concerns the reason for the move. Although the safety deficiencies in the existing facilities is EPA's official justification for the proposed transfer (see app. II), many EPA officials have said that the major consideration for the transfer was to fill space to become available in the Taft Center once a new EPA facility in Cincinnati is complete.

Because most of the 260 employees now occupying the Taft Center are to be transferred to the new facility when it is complete, the Taft Center will be virtually empty. An EPA occupancy plan for the Cincinnati area dated February 27, 1975, stated that only 80 EPA employees would be housed in the Taft Center. Included in this figure were the 30 positions to be transferred from the Beltsville and South Agriculture Building laboratories. A Taft Center official told us that at one time the Taft Center housed 400 employees.

We noted several indications that the desire to fill part of the Taft Center might well be a major reason for the proposed move.

A January 11, 1974, memorandum from the EPA Director, Facilities and Support Services Division, to the Assistant Administrator for Planning and Management stated, in part, that:

"The Task Force established to re-evaluate the EPA lab plan is nearing completion of its work. One of the purposes of a new look was to see what if anything could be relocated to Cincinnati to better utilize the new lab plan and the Taft Center.

"The functions that are candidates for relocation to Cincinnati are microbiology and the chemistry support laboratory. A total of 24 positions could be relocated to Cincinnati. These include 11 positions in the microbiology lab and 13 positions in the chemistry support lab.

"Once you exclude labs which are geographically located for program reasons there is little left that could be relocated to Cincinnati."

The memorandum mentioned that the Beltsville facilities were unsafe and inadequate, apparently as a result of EPA

safety surveys of the facilities, because the memorandum was written some 3 months before the INA safety survey of Beltsville.

It is interesting to note that the memorandum did not mention the results of the safety surveys EPA had made of the Taft Center in 1971 and 1972. (EPA was unable to give us copies of these surveys.) Neither did the memorandum mention the INA safety survey of the Cincinnati facility, which was made in August and September 1973.

The January 11, 1974, memorandum stated that EPA should inform the Department of Health, Education, and Welfare that there might be vacant space in the Taft Center for FDA personnel.

We found that EPA has been discussing, on an informal, preliminary basis, the possibility of FDA's moving some of its employees into the Taft Center. FDA officials told us that they could use all the Taft Center if EPA would turn the facility over to them.

CHAPTER 5

CONCLUSIONS, RECOMMENDATIONS, AND AGENCY COMMENTS

CONCLUSIONS

According to the EPA and INA safety surveys, safety deficiencies apparently do exist in the Beltsville facilities. However, as also evidenced by these safety surveys, safety deficiencies exist in the proposed location in Cincinnati where the laboratories are to be located. Therefore any move to the Cincinnati facilities would simply be moving the laboratories from unsafe conditions to unsafe conditions.

EPA's proposed transfer of the laboratories from the Beltsville and the Washington locations has not been justified on the basis of economy. The cost analyses EPA developed concerning the various aspects of the transfer included incorrect and questionable data. Additionally, some of the cost information which should have been developed is not available.

Since EPA has decided to transfer the laboratories to the Taft Center in Cincinnati, the costs associated with providing safe facilities in the Taft Center should be compared with the costs of providing safe facilities in Beltsville, to determine which is the most economical.

On the basis of EPA's cost analysis, it appears that the Taft Center option is less expensive than any of the Beltsville options. However, after adjusting EPA's analysis to reflect correct data, it appears the least expensive Beltsville option is the one which involves refurbishing the Pharmacology Laboratory building (building 225) and constructing an addition to an already existing building at the Beltsville complex and moving the entire Analytical Chemistry Laboratory (now in building 306) into that facility.

The cost of refurbishing the Taft Center to accommodate only the Beltsville laboratories would be about \$543,000; \$181,000 additional would be required to accommodate the Washington laboratories proposed to be transferred. Therefore EPA would have to spend about \$724,000 to refurbish the Taft Center to make it safe for the laboratories' high-hazard work.

In addition, \$207,000 could possibly be spent to transfer the affected employees. Therefore it could cost about \$931,000 to refurbish the Taft Center and move the employees. Additional costs, such as for recruiting and training employees and for contracting with private laboratories for necessary services, will increase the cost of transferring the laboratories to Cincinnati to over \$1 million. This figure is twice the amount of the least expensive Beltsville estimate.

The least expensive Beltsville estimate consists of refurbishing the Pharmacology Laboratory building (building 225) and constructing an addition to building 409 to accommodate the Analytical Chemistry Laboratory; the estimated maximum cost for the necessary work is about \$425,000.

It appears that the effects of the transfer on OPP's pesticide program were not adequately considered and therefore, if the transfer is made, OPP's pesticide capability, as well as the capability of other Government agencies and other organizations, may be hindered.

The loss of uniquely qualified staff; the time lost recruiting and training new employees; the geographic dislocation from Washington, which is considered "the pesticide capital of the world"; and the loss of contacts with other U.S. Government agencies, private associations, and foreign nations concerned with pesticides, will be detrimental to EPA's pesticide control program.

RECOMMENDATIONS TO THE ADMINISTRATOR, EPA

In view of the costs of the transfer and various program considerations--such as loss of uniquely qualified staff and disruption of EPA's pesticide control program and the programs of other Government agencies and other organizations--we recommend that the Administrator, EPA, reconsider the proposed laboratory transfer. Whatever is decided, the laboratories should be provided with safe facilities.

Concerning the Taft Center in Cincinnati, we recommend that the Administrator, EPA, require the Director, Facilities and Support Services Division, to explore the possibility of turning the Center over to the FDA, since FDA has told us that it could use the entire Center.

AGENCY COMMENTS

In a meeting with EPA officials on May 29, 1975, the Assistant Administrator for Planning and Management told us that, if it could be shown that it was more economical for the laboratories to remain in the Beltsville and Washington locations than to transfer the laboratories to Cincinnati, EPA would cancel the proposed move.

In a meeting with officials in EPA's Facilities and Support Services Division on June 2, 1975, we were given EPA's revised cost analysis of the least expensive Beltsville option and the cost of moving to the Cincinnati location where EPA plans to transfer the laboratories.

The Beltsville option consists of renovating the building housing the Pharmacology Laboratory (building 225), moving the Chemistry Laboratory from building 306 to building 409 (this involves constructing an addition), and renovating the space occupied by the Washington laboratories.

The Cincinnati option involves moving the Microbiology Laboratory and part of the Chemistry Laboratory from Beltsville and part of the Washington laboratories to the Taft Center in Cincinnati. The Pharmacology Laboratory and part of the Chemistry Laboratory would be moved to an already existing building in Beltsville, and the part of the Washington laboratories remaining would stay in their present location.

EPA's June 2 analysis of these two options was as follows.

Space Analysis--EPA at Beltsville

Existing (note a)

Building:	<u>Net square feet (note b)</u>	<u>Gross square feet</u>
225 (Pharmacology)	2,430	3,200
306 (Chemistry)	4,700	^c 7,000
406 and 407A (Microbiology)	3,630	4,500
409 (Pesticide storage)	1,400	1,700
South Agriculture	6,000	^c 8,900

Stay at Beltsville and Washington

Building:	<u>Net square feet (note b)</u>	<u>Gross square feet</u>	<u>Modification</u>
225 (Pharmacology)	2,430	3,200	^d \$ 50,000
306 (release)	0	0	0
406 and 407A (Microbiology)	3,630	4,500	0
409 (Chemistry)	4,400	6,500	525,000
South Agriculture	6,000	^c 8,900	317,000
			<u>892,000</u>
Moving and adjustment in interagency agreement			85,000
			<u>\$977,000</u>

Move to Cincinnati

Building:	<u>Net square feet (note b)</u>	<u>Gross square feet</u>	<u>Modification</u>
Taft Center	15,750	26,700	\$627,000
225 (release)	0	0	0
306 (release)	0	0	0
406 and 407A (Pharmacology and Chemistry)	3,630	4,500	0
409 (Animal)	1,150	1,700	10,000
South Agriculture (release)	0	0	0
			<u>637,000</u>
Relocation costs		45,000 to	207,000
		<u>\$682,000</u> to	<u>\$844,000</u>

^aBuilding whose occupancy could change depending on option selected.

^bUsable space.

^cEstimated equivalent gross square feet.

^dModification of 2,000 gross square feet of total.

However, EPA's cost analysis was again based on questionable or incorrect data. Therefore, after detailed discussions concerning each figure, it was mutually agreed that the correct analysis was as follows:

Existing

	<u>Net square feet</u>	<u>Gross square feet</u>
Building:		
225 (Pharmacology)	2,000	2,900
306 (Chemistry)	3,400	5,000
406 and 407A (Microbiology)	4,000	5,000
409 (Pesticide storage)	1,400	1,700
South Agriculture	5,200	7,700

Stay at Beltsville and Washington

	<u>Net square feet</u>	<u>Gross square feet</u>	<u>Modification</u>
Building:			
225 (Pharmacology)	2,100	2,900	\$ 50,000
306 (release)	0	0	0
406 and 407A (Microbiology)	4,000	5,000	0
409 (Chemistry)	3,400	5,000	365,000
South Agriculture	5,200	7,700	281,000
			<u>696,000</u>
Moving from building 306 to building 409			10,000
Space use costs for laboratories			80,000
			<u>\$786,000</u>

Move to Cincinnati

	<u>Net square feet</u>	<u>Gross square feet</u>	<u>Modification</u>
Building:			
Taft Center	10,500	17,800	\$418,000
225 (release)	0	0	0
306 (release)	0	0	0
406 and 407A (Pharmacology and Chemistry)	4,000	5,000	0
409 (Animal)	1,150	1,700	10,000
South Agriculture	3,000	4,400	180,000
			<u>608,000</u>
Relocation costs (this is the maximum relocation cost estimate)			207,000
			<u>815,000</u>
Space-use costs for remaining laboratories in Beltsville			36,000
Moving costs for remaining laboratories in Beltsville			10,000
Refurbishing building in Beltsville for Chemistry Laboratory			36,000
Total			<u>\$897,000</u>

The \$897,000 does not include such costs as those for purchasing equipment needed in Cincinnati, renting of the Ridge Avenue facility for 5 months, contracting out to private laboratories to make necessary experiments, and moving from the Ridge Avenue facility to the Taft Center. If these costs were included, the Cincinnati option would be considerably higher.

The Beltsville option will cost at least \$111,000 less than the Cincinnati option, excluding other costs mentioned above. The Acting Director, Facilities and Support Services Division, told us that therefore, on the basis of the adjusted cost analysis, he would tell the Assistant Administrator for Planning and Management that the transfer from Beltsville and Washington to Cincinnati could not be justified on the basis of economy.

APPENDIX I
GLADYS NOON SPELLMAN
5TH DISTRICT, MARYLAND

WASHINGTON OFFICE:
1117 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
(202) 225-4131

DISTRICT OFFICE:
SUITE 180
PRESIDENTIAL BUILDING
6525 BELCREST ROAD
HYATTSVILLE, MARYLAND 20782
(301) 436-8865

APPENDIX I
COMMITTEES:
BANKING, CURRENCY
AND HOUSING
POST OFFICE AND CIVIL SERVICE

Congress of the United States
House of Representatives
Washington, D.C. 20515

March 24, 1975

The Honorable Elmer Boyd Staats
Comptroller General of the United States
General Accounting Office
441 G Street, N. W.
Washington, D. C. 20548

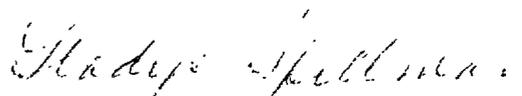
Dear Mr. Staats:

Enclosed is a letter I have received from Mr. Alvin L. Alm, Assistant Administrator for Planning and Management, Environmental Protection Agency, regarding estimated costs of moving the EPA Pesticide Chemistry and Microbiology Laboratories from their present facilities in Beltsville to Cincinnati, Ohio. I have been concerned about the reasons behind such a move for some time. Moreover, I am aware that Senator Mathias has requested you to look into this matter.

I am impressed that the primary reasoning behind this relocation is neither for better coordination nor for cost efficiency; rather, I perceive that the sole purpose of the projected move is based on a previous EPA commitment to provide occupancy to vacant EPA facilities in Cincinnati. Such insensitivity to the disruption of these employees' rights is deeply troubling. I find this doubly so when the move is justified in terms of safety and economy.

The most recent letter I have received (also enclosed) disturbs me in its implications about the relative safety of the EPA space in Cincinnati. I would, therefore, appreciate your investigating the cost merits of such a move, specifically assuring me that the proposed facilities in Cincinnati would be significantly safer.

Sincerely,



Gladys Noon Spellman
Member of Congress



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

6 JAN 1975

OFFICE OF
PLANNING AND MANAGEMENT

Honorable Gladys Noon Spellman
House of Representatives
Washington, D. C. 20515

Dear Mrs. Spellman:

This is in response to your letter of January 2, 1975, on the transfer of our microbiology and chemistry laboratories from Beltsville, Maryland to Cincinnati, Ohio.

Historically, it has been our long-standing intention to relocate from inadequate facilities at Beltsville starting in late 1960's with the pre-EPA appropriations of \$100,000 spent for building plans for a new laboratory facility at Beltsville and continuing into 1971 with the serious consideration of alternative sites, including Fort Detrick, for location of the Beltsville operations.

In 1972, the identification of major safety deficiencies in a number of EPA-occupied buildings at Beltsville and the Congressionally-directed study of EPA laboratories stressing consolidation of EPA activities, resulted in the EPA Laboratory Plan conclusion to establish a National Environmental Pesticides Center (NEPC) at NASA's Mississippi Test Facility (MTF) by consolidating Beltsville, Corvallis, and MTF Pesticides operations at MTF.

In 1974, a reevaluation of the 1972 EPA Laboratory Plan produced a revised Plan based on the EPA policy of utilizing available space wherever possible in lieu of budgeting for new construction or major improvements to existing facilities. This latest revised EPA Laboratory Plan, dated March 1974, states that the Beltsville site must be retained because of ongoing pesticide programs tied to existing agricultural plots and orchards at that location. It also concluded that the chemistry and microbiology activities which are not geographically dependent on their location will be transferred to available EPA-owned space in Cincinnati, and that space presently occupied in Buildings 225 and 306 will be turned back to USDA as surplus to EPA needs.

In brief, Buildings 225 and 306 are classified as having high hazard contents and operations. They do not meet minimum Occupational Safety and Health Administration and EPA safety requirements for ventilation and exits, and in certain aspects for construction. As examples, Building 306 has an inadequate supply of outside air to provide laboratory ventilation and make-up air to fume hoods. There is no second means of exiting from the laboratories. Fire-rated doors and partitions are required. There is no adequate fire suppression system in the building. Building 225 has similar deficiencies and its roof does not meet requirements of noncombustible construction.

In the broader context, we have employees in some 72 geographical locations around the country. Safety surveys have been conducted at 46 of those locations where the major concentration of employees and program activities exist. Safety surveys are planned for the remaining 26 locations which are mainly 1 to 4 man operations such as state liaison offices, pesticides inspectors offices, etc.

In the 46 locations surveyed, major deficiencies were identified in facilities in 35 locations where EPA has laboratories with "high hazard" contents as defined by OSHA.

Since 1972, EPA has had plans to correct identified major safety deficiencies by various means including replacing or upgrading an existing substandard facility depending on the economics and the program need to remain at the location, or relocating the program activities to a different location where safe and adequate facilities could be provided based on program considerations and facilities utilization requirements. The EPA Laboratory Plans of November 1972 and March 1974, as submitted to the OMB and the Congressional Appropriations Subcommittees, are evidence of this planning process. Many locations have already been closed out with others in process of being relocated.

With regard to costs, our estimates are as follows:

1. Construction of new lab building at
Beltsville.....\$1,500,000
2. Modifications of Buildings 225
and 409.....\$ 550,000
3. Modifications of Building 306.....\$1,000,000

The alternatives listed above were then compared to the cost of three options in Cincinnati for the chemistry and microbiology activities.

- 1. Modification of the existing Taft Center
and moving to that location.....\$ 345,000
to
\$ 507,000

- 2. Preparing unequipped space in the new
Cincinnati Laboratory and moving to that
location.....\$ 275,000
to
\$ 437,000

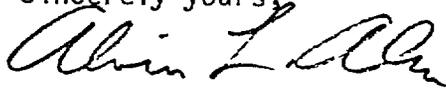
- 3. Moving into already equipped laboratory
space in the new building.....\$ 45,000
to
\$ 207,000

(These data provide for moving some equipment from Beltsville and for costs of employee moves. For example, the range of \$45,000 to \$207,000 is indicated because the actual number of employees to relocate is unknown and entitlement to relocation costs will vary. If all employees move, and all are home owners receiving maximum reimbursement for real estate settlement costs, the high figure will be close. If one-half move, and receive average cost reimbursement based on our experience, then the low figure will be close.)

As indicated above, the Cincinnati options are the most economical and provide safe facilities. Because of recent organizational changes in Cincinnati, we are now exploring program relocationship to determine the best specific location in Cincinnati for the pesticides programs.

Finally in connection with personnel relocations, we will make every effort to minimize disruption. Counseling, outplacement assistance, and moving assistance will be provided to affected employees.

Please contact me if I can be of further assistance.

Sincerely yours,

 Alvin L. Alm
 Assistant Administrator
 for Planning and Management

EPA--USDA COOPERATIVE PROJECTS

1. One EPA laboratory in Beltsville collaborated in a study with USDA's Agricultural Research Service of the deaths of premature infants in a number of hospitals in this country. Together they accumulated the scientific data needed to solve the problem caused by using a commercial fungicide on infant ware and prevented further deaths. This study was done quickly (in a matter of weeks) and efficiently because of the close cooperation between the two units.
2. This same EPA laboratory and the Service collaborated in a study which involved the deaths of thousands of beef cattle in the western United States.
3. The same EPA laboratory and the Service furnished data on a cancer-causing compound with respect to its occurrence and formation in fungicides which may be used on at least 50 percent of the Nation's food supply. This data was developed through the informal exchange of scientific ideas, theories, and data between EPA and USDA. The data resulted in important publications' being issued and in new tolerances' being set for the fungicides most widely used on the Nation's food supply and has caused a worldwide review of the uses of these fungicides.
4. EPA gave USDA data on 600,000 aerosols consigned to the Department of Defense. USDA asked EPA's Beltsville laboratory to evaluate the analytical method and analyze a representative sample of the aerosols. The laboratory found the aerosols to have a pesticide content acceptable to the Department of Defense. EPA and the prime manufacturer, together, are to submit to USDA an interim specification analysis for this type of product. EPA is developing a permanent specification method.
5. EPA's Beltsville laboratory constantly trains, formally and informally, Service chemists in operating infrared, ultraviolet, and visible spectrometers. In addition, the EPA laboratory makes its sophisticated instrumentation available to USDA on a daily basis. One EPA-trained USDA chemist immediately solved a difficult problem for his division as a result of the training.
6. The EPA laboratory routinely furnishes pesticide standards to USDA for use in its research programs.

7. The EPA laboratory has worked closely with USDA in developing methods for analyzing chemicals which are highly toxic and those which cause birth defects.
8. EPA's Beltsville laboratories routinely analyze USDA grains for pesticide residues. The food processed from these grains is used to feed a large segment of our country's population and that of underdeveloped nations. USDA says it is essential that EPA have a close physical relationship with USDA, to efficiently and quickly pass on information to it with respect to harmful residues.
9. EPA's Beltsville laboratories have arranged many seminars for both EPA's and USDA's scientific personnel who have mutual interest in the chemistry of pesticides and their relation to the health of the country.
10. EPA's Beltsville laboratories and USDA, together, have generated important data on the effect of pesticide cross-contamination in agricultural formulations. EPA developed the technique of detection and, together with USDA, showed the effects of such contamination in fat residues of beef cattle in the United States.
11. EPA's Beltsville laboratories worked closely with USDA in evaluating a new larval fly media, which is used in rearing houseflies for standards tests in evaluating new insecticides.
12. EPA's Beltsville laboratories routinely furnish USDA with such services eradicating rats, mice, and birds in USDA's granary and poultry units. Such services allow USDA to effectively carry on certain research programs which are valuable to agricultural growth in this country. Such services also save USDA considerable amounts of money which can be applied to agricultural research.
13. EPA's Beltsville laboratories have given USDA important scientific data with respect to USDA's search for alternatives to the cyanide-cartridge gun for predator control.
14. EPA's Beltsville laboratories have given USDA important advice on minimizing deer damage to fruit tree orchards. This advice not only saves USDA's research in this area but also results in a considerable cost saving which can be applied to further fruit tree research.

15. EPA's Beltsville laboratories did viral radioactive polio recovery studies for USDA. This data was generated as part of USDA's Blue Plains solid-waste (sludge) experiment.
16. EPA's Beltsville laboratories evaluate the toxicity of USDA-developed insect attractants--disparlure (gypsy moth), phenethylpropionate (Japanese beetle), and heptyl butyrate (yellow-jacket wasp). Such information is vital to USDA, EPA, and environmental groups throughout the country with respect to developing biological pest controls.
17. EPA's Beltsville laboratories routinely furnish technical assistance to USDA's poultry antisera program (for poultry viruses).
18. EPA's Beltsville laboratories have furnished USDA with toxicity data on treated seed corn for suitability as livestock feed.
19. EPA's Beltsville laboratories gave USDA data for evaluating hand-washing lotions used in food-processing plants. FDA will probably use this data when evaluating sanitary conditions of food-processing establishments.
20. EPA's Beltsville laboratories provided USDA's Agricultural Environmental Quality Institute and the Veterinary Science Laboratory in Beltsville with over 114 pesticide standards in the last year. Many of these compounds are not readily available to USDA but are available to EPA's Beltsville laboratories.

PRINCIPAL EPA OFFICIALS
RESPONSIBLE FOR ACTIVITIES
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
ADMINISTRATOR: Russell E. Train	Sept. 1973	Present
ASSISTANT ADMINISTRATOR FOR PLANNING AND MANAGEMENT: Alvin L. Alm	July 1973	Present
DEPUTY ASSISTANT ADMINISTRATOR FOR ADMINISTRATION: Howard M. Messner	Jan. 1971	Present
ASSISTANT ADMINISTRATOR FOR WATER AND HAZARDOUS MATERIALS: James L. Agee	July 1974	Present
DEPUTY ASSISTANT ADMINISTRATOR FOR PESTICIDE PROGRAMS: Edwin L. Johnson	Apr. 1975	Present
Edwin L. Johnson (acting)	Dec. 1974	Apr. 1975