

## **I. PURPOSE**

RMDS 2550D provides EPA guidance on how employees should track and charge superfund costs and explains related site-specific accounting rules and methods to identify costs by site for cost recovery and reporting purposes. Below is the background, descriptions of the major organizations involved, and references to specific relevant guidance.

In 1980, Congress passed the Comprehensive Environmental Response, Compensation and Liability Act to address the dangers of abandoned or uncontrolled sites contaminated with hazardous substances. The law established the Superfund Trust Fund for the EPA to use in cleaning up sites where the parties liable for the contamination could not be found or were not financially viable to pay for the cleanup. The legislation also enabled the federal government to recover the costs of its actions from the responsible parties or to compel them to clean up sites at their own expense. EPA assigns a high priority to locating responsible parties and requiring them to address cleanup. The agency's goal is to ensure that liable and financially viable parties pay for the cost of cleanup.

Even though EPA prefers to have financially viable responsible parties clean up their sites, it may become necessary for EPA to begin work at a site and recover costs later. Therefore, EPA must be able to identify costs it has incurred specific to a site. The method EPA uses is the site-specific identifier code. All costs incurred at a specific site must be identified with a unique SSID code.

The superfund cleanup process begins with site discovery or notification to EPA of possible releases of hazardous substances. Once discovered, sites are entered into the Superfund Enterprise Management System, which houses EPA's inventory of sites with potential hazardous substance releases. The agency assesses sites to determine if a real or potential threat exists and if further investigation or action is needed.

EPA employees who assess and/or clean up hazardous waste sites incur costs, such as salaries and travel, which are recorded in administrative systems (payroll and travel) to be transferred to the agency's financial system of record. The EPA also obtains cleanup and support services from non-EPA entities, such as other federal agencies, municipalities, tribes, states, and private contractors using various funding mechanisms, including interagency agreements, cooperative agreements, grants, and contracts. Non-EPA entities' costs also are recorded in administrative systems to be transferred to the agency financial system of record.

The funding documents processed through EPA's administrative and financial systems must contain enough information to assign superfund costs properly. Consequently, EPA developed the SSID, so that the agency can properly assign Superfund hazardous waste response costs and identify costs by site for cost recovery and reporting purposes. The SSID code is flexible enough to cover the following circumstances:

- A.** Assigning or allocating costs when specific sites are known and a site-specific SSID code has been established (see Section III.B).
- B.** Assigning costs when specific amounts cannot be assigned to specific sites at the time of obligation:

the “WQ identifier” (see Section III.C.1).

- C. Assigning or allocating costs when an SSID code has not been established: the “ZZ identifier” (see Section III.C.2).
- D. Assigning or allocating costs that do not apply to a particular site or that are not economically feasible to charge on a site basis: the zero zero (“00”) identifier” (see Section III.C.3).

Additionally, the Oil Pollution Act of 1990 augments the authorities and requirements under the Clean Water Act to govern the discharge of oil into the navigable waters of the United States. EPA is responsible for responding to oil discharges in the inland zone of the United States. Cost documentation provided by EPA OnScene Coordinators is the basis for subsequent cost recovery efforts by the U.S. Coast Guard. Funding for oil spill response (cleanup) activities is derived from a reimbursable interagency agreement with the USCG. EPA uses a similar SSID code to capture costs at oil spill response actions.

Several offices play a role in making sure that controls are in place to ensure that SSID codes are properly assigned to funding documents and that costs are properly allocated to a specific site. This Policy Procedure describes the roles and responsibilities of these offices and the processes involved in accounting for superfund and oil spill costs.

## II. AREAS OF RESPONSIBILITY

### A. EPA Contracting Officers Representative

1. Ensure that contracts and agreements with outside parties require the recipient to provide sitespecific cost details in a timely manner.
2. Ensure that *sufficient documentation is provided in a timely manner*<sup>1</sup> as prescribed in Section III.C to allow redistribution of costs to the correct site-specific or non-site specific accounting information.
3. Provide, in a timely manner as prescribed in Section III.C.1, the appropriate Finance Center with sufficient site-specific accounting information to redistribute costs that may not have been assigned to a specific site at the time of obligation (WQ identifier) or that were recorded prior to establishment of an SSID code (ZZ identifier) in the agency financial system of record.
4. *Review expenditure data at least quarterly*<sup>2</sup> to assess whether costs charged to WQ identifiers have been redistributed.
5. *Ensure compliance with the terms and conditions set forth by the Office of Grants and Debarment in Section II.H.2 for future superfund grants/cooperative agreements.*<sup>3</sup>

---

<sup>1</sup> Key internal control

<sup>2</sup> Key internal control

<sup>3</sup> Key internal control

## **B. Regional Remedial, Removal, Federal Facilities, or Enforcement Program Offices**

1. Determine if and when new SSID codes need to be established.
2. Confirm that a site is not listed under another name prior to establishing a new SSID code, especially if multiple operable units are involved.
3. Request the regional comptroller, finance office, or other official as established within each region's organizational structure to establish new SSID codes in the agency financial system of record.
4. Contact the Cincinnati Finance Center to obtain new oil spill SSID codes.
5. *Record new superfund SSID codes in SEMS.*<sup>4</sup>
6. Establish communication procedures to disseminate new SSID codes and any additional guidance required for proper cost allocation. Ensure guidance addresses proper use of SSID codes and superfund accounting procedures before any funding vehicles are approved.

- 
7. In concert with the regional comptroller or finance office, ensure that appropriate staff are properly trained and equipped to (1) identify and record costs associated with a specific site and provide site distribution documentation as necessary, and (2) identify and record costs not associated with a specific site, or costs not economically feasible to charge on a site-specific basis.
  8. *Ensure that employees correctly charge time and travel using the appropriate SSID code.*<sup>4</sup>

## **C. Headquarters Program Offices**

1. Ensure that appropriate staff are properly trained and equipped to (1) identify and record costs associated with a specific site and provide site distribution documentation as necessary, and (2) identify and record costs not associated with a specific site or costs not economically feasible to charge on a site-specific basis.
2. Provide access to superfund-specific training to regions on tracking costs by site and providing site distribution documentation for contracts and IAs.

3. ***Ensure that employees correctly charge time and travel using the appropriate SSID code.***<sup>5</sup>
4. ***Review headquarters expenditure data at least quarterly***<sup>6</sup> to assess whether costs charged to WQ identifiers have been redistributed.

#### **D. Regional Comptrollers or Finance Offices**

1. Establish and maintain new superfund SSID codes and accompanying accounting information in the agency financial system of record at the direction of the regional program offices.
2. Enter new superfund accounting information in the agency financial system of record as necessary, at the direction of the regional program offices, to allow site-specific charging for appropriate response actions.
3. Provide People Plus work code administration that includes processing the Compass Payroll Reallocation Notebook, reviewing and following up on the PPL unattested report, training site chargers, assisting users by establishing work codes, troubleshooting PPL system work code charging issues, etc. PPL is EPA's automated time and attendance system.
4. Monitor, reconcile, and certify site-specific costs via the Superfund Cost Recovery Package Imaging and On-line System. Verify through SCORPIOS documentation/reconciliation that sitespecific costs are supported by documentary evidence and are accurately charged.

- 
5. ***Review regional expenditure data at least quarterly***<sup>7</sup> to assess whether costs charged to WQ identifiers have been redistributed.
  6. In concert with program/Office of Regional Counsel/legal enforcement offices, establish communication procedures to disseminate new superfund SSIDs and any additional guidance required for proper cost allocation.
  7. In concert with program office, ensure that appropriate staff are properly trained and equipped to (1) identify and record costs associated with a specific site and provide site distribution documentation as necessary, and (2) identify and record costs not associated with a specific site, or costs not economically feasible to charge on a site-specific basis.
  8. Provide witness testimony regarding site costs reflected in SCORPIOS cost reports.

---

<sup>5</sup> Key internal control

<sup>6</sup> Key internal control

<sup>7</sup> Key internal control

## **E. Office of the Controller, Office of the Chief Financial Officer**

### *Immediate Office*

Provide witness testimony regarding annual allocation and EPA's indirect rates.

### *Finance Centers*

1. Only the Cincinnati Finance Center assigns oil spill SSID codes to regional program offices. CFC enters oil spill SSIDs and organization codes into the agency financial system of record.
2. Process payment requests for superfund and oil spill activities.
3. ***Review expenditure data quarterly***<sup>8</sup> to assess whether costs charged to WQ and ZZ identifiers have been redistributed and advise the contracting officer representative, and/or responsible EPA official or grant recipient, as appropriate.
4. ***Confirm the recording of the site-specific hours in PPL and verify***<sup>9</sup> that site-specific travel costs incurred during the pay period are charged to the same site-specific accounting information as the employee's timesheet while in travel status.
5. ***Ensure that site-specific travel receipts are obtained and scanned. Follow up on missing travel receipts directly with employees. Elevate missing receipts to the regional liaison when appropriate.***<sup>11</sup>

---

### *Policy, Training and Accountability Division*

1. Ensures that ***policies and procedures are current***<sup>10</sup> for site-specific and non-site specific charging and superfund and oil cost recovery. Develops new superfund and oil cost recovery guidance and policies.
2. Periodically request SSID expenditure reviews in accordance with EPA Order 1000.24 Management's Responsibility for Internal Controls.

### *Accounting and Cost Analysis Division*

---

<sup>8</sup> Key internal control

<sup>9</sup> Key internal control

<sup>11</sup>

<sup>10</sup> Key internal control

1. Upon request, reviews methodologies for allocating costs apportioned within a site (e.g., operable units) and provides witness services concerning the methodology during litigation. Accounting at the operable unit level is discussed in Section III.D.
2. *Manages the annual allocation process to recover superfund contractors' site support costs that cannot be assigned to a specific site<sup>11</sup> and updates the annual allocation rate in SCORPIOS.*
3. Calculates EPA's fiscal year indirect costs rates; updates SCORPIOS at the time new indirect rates are issued to ensure that indirect costs are assigned to the correct SSID codes.

#### **G. Office of Grants and Debarment**

1. Provides access to superfund-specific training on tracking costs by site and providing site distribution documentation for cooperative agreements and grants, and tracks grants and IA COR training certifications.
2. Inserts terms and conditions in future superfund grants/cooperative agreements requiring sitespecific cost details within one business day of the payment drawdown.

### **III PROCEDURE DETAILS**

#### **A. Superfund Site/Spill Identifiers**

1. The regional program office (i.e., the regional removal, remedial, federal facilities, or enforcement organizational units) will make the determination to establish a new SSID code. The SSID code is a four-character alpha-numeric code occupying the first four positions of the Site/Project field in EPA's Account Code Structure. It is used in the agency financial system of record to track superfund costs for each specific site.
2. SSID codes generally are established during the period when the agency is determining if a threat exists and if further investigation is needed. A general description of the superfund cleanup process is available at <https://www.epa.gov/superfund/superfund-cleanup-process>.

---

<sup>11</sup> Key internal control

- a. **Removal Program:** When it is not feasible, with the exception of emergencies, the SSID code should be established no later than when extramural funds are obligated for removal cleanup action. A new SSID code should not be assigned for removal work at a site already on the National Priorities List; appropriate existing removal program results codes and action codes should be used.
  - b. **Remedial Program:** The SSID code generally should be established during or after the preliminary assessment/site inspection stage when further federal response action is determined to be necessary. The SSID code must be set up by the time the remedial investigation (RI) stage has begun.
  - c. **Enforcement Program and Federal Facilities Program:** These programs establish SSIDS in accordance with the same superfund cleanup process as the Remedial Program.
  - d. **Oil Program:** SSIDs are established when an oil spill occurs and the regional office contacts Cincinnati Finance Center to establish an oil spill SSID.
3. Each region and headquarters office should have *communication procedures that effectively disseminate new SSID codes*<sup>14</sup> to ensure that all applicable costs are charged to the SSID codes as soon as possible. The following offices/staff should be advised of the new SSID code at the same time:
- a. CORs.
  - b. Work assignment managers.
  - c. Other contract managers to include contracting officer representatives.
  - d. Applicable Finance Centers.
  - e. Office of Regional Counsel/Legal Enforcement Program.
  - f. Other program staff and managers assigned to or otherwise working on the site.
  - g. Other offices within EPA, contractors, federal agencies, or state agencies that require this information.
4. For additional guidance on SSID code assignments, contact the regional comptroller/regional finance office or as otherwise reflected in regional organizational structures.

## **B. Recording Site-Specific Costs Using SSID codes**

- 1. All costs directly associated with cleanup/response actions at or for a particular superfund site must be charged to that site. The only exception is for costs that cannot be identified or easily allocated to specific sites. Examples include a meeting held to discuss issues regarding all sites in

the region or staff training on a specific type of cleanup response methodology that affects all sites. Costs that may be charged site-specifically include salaries and benefits, travel, rental and purchase of equipment and supplies, and those costs incurred by parties external to EPA, such as EPA's contractors, other federal agencies, local governments, states, and private parties.

3. To charge costs against a specific SSID, employees should include the appropriate program results code and action code from the Action Code Dictionary. All EPA staff should carefully consider whether any work in which they have engaged could be attributed to a specific superfund site. Staff engaged in superfund site-specific work must ensure that the correct work codes are in PPL so they can record the time spent working at or on a site. Examples of employees performing activities chargeable to superfund are finance and enforcement specialists, On-Scene Coordinators, remedial project managers, and attorneys who work directly at the site, negotiate settlements, or work on cost recovery actions. However, many other EPA employees perform site-related activities chargeable to superfund. Branch chiefs, division directors, office directors, and their employees may charge their costs to a specific site if appropriate. Employees who normally do not charge to sites, or who have non-superfund payroll cost allocation work codes should charge any time and travel for superfund site-specific work to the appropriate SSID code. Exhibit 1, *Allocation of Payroll, Travel, and Other Intramural Costs*, contains additional details on the allocation of payroll costs.
4. When recording time in PPL, time should be charged to specific sites in 15-minute increments, regardless of how many sites were worked on during a given pay period. This requirement applies to any program, legal, or administrative activities performed by staff at any organizational level in headquarters, finance centers, and the regions.
5. If an employee's time is divided among several sites in a manner that is not economically feasible to charge to a specific site (e.g., less than 15 minutes per site), or cannot be tracked by site, the 00 identifier should be used. The ZZ identifier should not be used in this situation; the ZZ identifier should be used only for site-specific costs incurred before an SSID code is assigned.
6. Once an SSID code is established, CORs and other EPA officials must assign new charges for this site to the new SSID code. Exhibit 1 contains additional guidance.
7. If corrections to time charged in PPL are necessary, refer to the PPL resource page located on the agency intranet.
7. In general, the same criteria for determining site-specific time charges also apply to travel expenditures. Travel should be charged to the same SSID and accounting information as the traveler's salary during the period of travel. Other intramural expenses should follow suit.



8. Travel should be processed through the travel management system (Concur). Travelers should ensure original site-specific travel receipts are provided to the Cincinnati Finance Center and/or in accordance with regional operating procedures.
9. Charge comp-time and credit hours accrued while working on specific sites to the non-site specific 00 SSID instead of the site-specific SSID. The Agency's Indirect Cost Rate allocation methodology accounts for these costs. This determination supersedes all previous policy announcements.

### **C. Recording Costs Not Immediately Attributable to Specific Superfund Sites**

Under some circumstances, it is impossible or impractical to charge certain superfund costs to a specific site. EPA uses special SSID identifiers for these situations, as explained below. These standard codes appear in the third and fourth position of the SSID code and must be used by all regions and headquarters offices charging costs to the superfund. Additional information is available in Exhibit 2 Frequently Asked Questions and Answers to Recording and Allocating Costs Not Immediately Attributable to Specific Superfund Sites.

#### **Codes for Recording Costs Not Immediately Attributable to Specific Superfund Sites.**

<b>Identifier</b>	<b>Use</b>
WQ	When amounts cannot be determined for specific sites at the time of obligation
ZZ	When a site-specific SSID code has not been established, but initial assessment costs are incurred.
00	When recording superfund costs that are not directly attributable to a site, or when it is not economically feasible to charge costs on a site basis

#### **1. WQ Identifier**

- a. The WQ identifier is a generic SSID code that EPA uses to obligate funds to IAs, cooperative agreements, grants, and contracts when the precise amount to be charged to specific sites or actions is unknown at the time of obligation. Use of the WQ identifier is called "bulk funding."
- b. Superfund special account funds (i.e., fund codes TR2, TR2A, and TR2B) and Superfund state cost share resources (i.e., fund code TR1) may not be obligated or expended to the WQ identifier in the SSID field; a site-specific SSID must be used for the obligation of special account funds and state cost share resources.

- c. *Costs should be redistributed from WQ to a site-specific SSID code, ZZ, or 00 identifier within 30 days of payment for all funding vehicles (i.e., IAs, grants, small purchases, and contracts).*<sup>15</sup> (See ZZ, 00, and timing of drawdown and redistribution actions discussions below.)

- d. *Finance Centers perform quarterly reviews of WQ expenses.*<sup>12</sup> Useful Compass Data Warehouse inquiries include:

- i. Budget Detail Spending Inquiry.
- ii. Compass Advanced Query.

## 2. ZZ Identifier

- a. *The ZZ SSID records initial assessment costs at a superfund site where no SSID exists. If EPA determines that a cleanup response is necessary, a site-specific SSID is set-up to charge all future costs incurred.*
  - i. Removal Program: Costs charged to the ZZ SSID primarily include removal assessment and technical assistance-related costs. See the Action Code Dictionaries for specific guidance on actions applicable to the ZZ SSID.
  - ii. Remedial Program: Costs charged to the ZZ SSID generally include, but are not limited to, preliminary assessment/site inspections. Generally, assign site-specific costs associated with the Remedial Investigation and beyond to a site-specific SSID, not the ZZ SSID (See section III. A. 2. b.). In addition, assign multi-site project management to the 00 SSID when it is not economically feasible to divide costs among site-specific SSIDs (see Section III. B. 5.). See the Action Code Dictionary for specific guidance on actions applicable to the ZZ SSID.
- b. *Costs may be charged to ZZ identifiers as prescribed in the Action Code Dictionary.*
- c. The approving official, usually the COR, should request the Regional Comptroller or Finance Office to adjustment of previous charges from the ZZ identifier to the site account during the first billing cycle after the site-specific SSID code is established. Intramural costs also should be adjusted during the first billing cycle after the site-specific SSID code is established.

---

<sup>12</sup> Key internal control

### **3. 00 Identifier**

- a. The 00 identifier is used only when recording general superfund costs or when it is not economically feasible to charge costs on a site basis.
- b. Efforts spent preparing a response to a site-specific Freedom of Information Act request for information about a particular site are charged to the 00 identifier.
- c. EPA uses the annual allocation process to assign site-allocable 00 identifier (non-site specific) costs to sites for certain superfund contracts. Accounting and Cost Analysis Division reviews annual allocation reports and ensures cost recovery of the contractors' nonsite-specific costs. The *Instructions for Performing the Annual Allocation of Non-Site-*

*Specific Costs* contains more information about non-site-specific costs for superfund contracts.

### **D. Accounting at the Operable Unit Level**

1. Operable units are discrete portions of a larger superfund site. The operable unit is a tool that can be used to better manage the superfund site.
2. The 7<sup>th</sup> and 8<sup>th</sup> fields in the Site/Project field of the Account Code Structure can be used to enter the OU number for the site to track costs (i.e., 01, 02, etc.).
3. Costs incurred at a superfund site may be directly associated with one specific operable unit, directly associated with several operable units, or costs incurred may be directly associated with the superfund site in general. For cost recovery purposes, regions using operable unit accounting may need to develop an allocation methodology for the general superfund site costs so the operable units receive their share of the general superfund site costs.
4. As regions develop their allocation methodologies, they may elect to have the ACAD review and approve the allocation methodology.

### **E. Oil Spill Accounting**

1. The Cincinnati Finance Center assigns the SSID codes for oil spill sites.
2. CFC records oil spill SSID codes and organization codes in the accounting system.
3. Oil spill SSID codes only have four characters and do not include action codes or operable units. These codes use a Z or V designation instead of a 0 in the first position.
4. Oil spill sites do not have ZZ costs.

5. Oil spill sites use the 00 code for bulk funding, which must be redistributed.
6. Oil sites do not use the WQ code.

#### **F. Timing of Drawdown and Redistribution Actions**

1. ***CORS for contracts and IAs should provide Finance Centers with site redistributions within one business day of payment approval*** as specified in the site redistribution clause. Grant recipients must submit a superfund reallocation form to the appropriate Finance Center within one business day of the payment request.<sup>17</sup>
2. ***CORs should explain and document situations for their supervisors where WQ redistributions are not submitted within one day of payment approval.***<sup>13</sup> Documentation also should be provided to the Office of Financial Services, with a copy to the appropriate Finance Center.
3. Within 30 days of receiving redistribution information from a COR or grant recipient, the Finance Center should redistribute costs in the agency financial system of record for IAs and contracts.
4. ***Finance Centers review WQ expenditure data quarterly***<sup>14</sup> to assess whether costs charged to WQ identifiers have been redistributed and advise the contracting officer representative, and/or responsible EPA official or grant recipient, as appropriate.
5. ***Finance Centers confirm the recording of the site-specific hours***<sup>15</sup> in PPL within 30 calendar days of processing the travel vouchers for payment. They also verify that site-specific travel costs incurred during the pay period are charged to the same SSID and accounting information as the employee's time for the days in travel status.
6. ***New superfund IAs should contain the statement "IA recipients must provide site-specific costs within (1) day of drawing down funds" as part of the terms of the agreement.***<sup>16</sup> CORs for older IAs without that requirement should ensure recipients provide site-specific redistribution documentation in a timely manner.

---

<sup>13</sup> Key internal control

<sup>14</sup> Key internal control

<sup>15</sup> Key internal control

<sup>16</sup> Key internal control

7. Cooperative agreements, prepared after December 23, 2008, should require the recipient to provide site-specific cost details within one (1) business day of drawing down funds.
8. Finance Centers should meet the following specific redistribution schedule:

- a. **Las Vegas Finance Center**

**Grants:** Makes funds available in Treasury's Automated Standard Application for Payments referencing either the WQ account or the specific SSID. If drawing from the WQ account, the recipient must submit a superfund reallocation form within one (1) business day indicating the SSID codes to which the payment should be redistributed. If the SSID is listed in ASAP, the recipient selects the proper SSID code to charge at the time the request payment. *LVFC reviews disbursements at least quarterly.*<sup>22</sup> Any amounts expensed directly from WQ are identified for the recipient to take corrective action. LVFC also *verifies that all WQ expenditures have been redistributed at the time of grants closeout.*<sup>23</sup>

---

**b. Cincinnati Finance Center**

**Interagency Agreements:** Processes completed IA's payment requests and reallocations in the Intra-Governmental Payment and Collection within thirty days of receipt of the site distribution form.

**c. Research Triangle Park Finance Center**

- i. **Contracts:** Processes monthly reports of bulk-funded superfund and oil spill activity by funding vehicle and completes contract and small purchase site distribution within thirty days of the document being certified to the Department of the Treasury for payment.
  - ii. **Small Purchases:** Processes small purchase site redistributions within thirty days of the document being certified to the Department of the Treasury for payment.
9. Once a site-specific SSID is established, the approving official, usually the COR, will request adjustment of previous disbursements from the ZZ SSID to the site-specific SSID. Generally, conduct readjustments during the first billing cycle after the site-specific SSID is established. Redistributions of ZZ intramural and cooperative agreement disbursements are not required due to the complexity associated with tracking site-specific costs outside agency systems. However, once a site-specific SSID is established, do not charge disbursements for the site to the ZZ SSID (See Section III. B. 7).

**IV. REFERENCES**

- A. RMDS documents are available on the EPA Intranet at <http://intranet.epa.gov/ocfo/policies/resource.htm>.
1. RMDS 2550D, *Financial Management of the Superfund Program*.
  2. RMDS 2550B, *EPA Travel Policies and Procedures*.
  3. RMDS 2540-08, *Payroll*.
  4. RMDS 2540-13.1, *Indirect Billing Rates*.
- B. EPA's Records Management Schedule Policy is available at <https://www.epa.gov/records>
- C. Superfund Policies and Guides <https://www.epa.gov/superfund/superfund-policy-guidance-and-laws>
- D. Action Code Dictionary  
[http://intranet.epa.gov/ocfo/superfund\\_A/action\\_code\\_dictionaries.htm](http://intranet.epa.gov/ocfo/superfund_A/action_code_dictionaries.htm)

- E. A general description of the superfund cleanup process is available at <https://www.epa.gov/superfund/superfund-cleanup-process>.
- 
- F. Compass Data Warehouse is available at <https://ocfosystem1.epa.gov/neis/adw.welcome>
- G. Concur, the travel management system, is available at <https://cge.concursolutions.com/>.
- H. Information on EPA travel is available at <https://intranet.epa.gov/ocfo/finservices/travel.htm>
- I. Contact the Office of Grants and Debarment for information on OGD’s superfund-specific training. <http://intranet.epa.gov/ogd/contactus.htm>.
- J. Payroll Cost Allocation Work Code information is available on the agency sharepoint at [https://usepa.sharepoint.com/sites/OCFO\\_Work/OFM\\_FPPS/SitePages/PCA%20Home.aspx](https://usepa.sharepoint.com/sites/OCFO_Work/OFM_FPPS/SitePages/PCA%20Home.aspx)
- K. PeoplePlus resource page is available at <http://intranet.epa.gov/peopleplus/>.
- L. For superfund-specific policies and training to regions on tracking costs by site and providing site distribution documentation for contracts and IAs contact the Office of Land and Emergency Management, Office of Superfund Remediation and Technology Innovation <http://intranet.epa.gov/osrti/about/contact.htm>.

## V. DEFINITIONS/ACRONYMS

### A. Definitions

**Bulk Funding** – The WQ identifier is a generic SSID code that EPA uses to obligate funds to IAs, cooperative agreements, grants, and contracts when the precise amount to be charged to specific sites or actions is unknown at the time of obligation. Use of the WQ identifier is called “bulk funding.”

**Extramural Costs** – Costs incurred by parties external to EPA, such as EPA’s contractors, other federal agencies, local governments, States, and private parties.

**Concur** – EPA’s automated eTravel system.

**Intramural Costs** – EPA’s internal operational costs for performing an activity.

**NPL** – The National Priorities List of sites identified for possible long-term cleanup.

### B. Acronyms

**00** Non-site-specific account used when recording general non-site specific Superfund costs

<b>ACAD</b>	Accounting and Cost Analysis Division located within the Office of the Controller, Office of the Chief Financial Officer
<b>ASAP</b>	Automated Standard Application for Payments
<b>CERCLA</b>	Comprehensive Environmental Response, Compensation and Liability Act of 1980 (the law governing the Superfund program)
<b>CFC</b>	Cincinnati Finance Center located with the Office of the Controller, Office of the Chief Financial Officer
<b>COR</b>	Contracting Officer Representative
<b>EPM</b>	Environmental Program Management (EPA's basic appropriation for funding its internal operating expenses)
<b>IA</b>	Interagency Agreement
<b>LVFC</b>	Las Vegas Finance Center located within the Office of the Controller, Office of the Chief Financial Officer
<b>NPL</b>	National Priorities List
<b>OCFO</b>	Office of the Chief Financial Officer
<b>OC</b>	Office of the Controller
<b>OGD</b>	Office of Grants and Debarment
<b>PPL</b>	PeoplePlus (EPA's automated system that integrates human resources, benefits, payroll, and time and attendance activities). The PeoplePlus resource page is located on the agency intranet at
<b>RMDS</b>	Resource Management Directives System
<b>SCORPIOS</b>	Superfund Cost Recovery Package Imaging and On-line System
<b>SEMS</b>	Superfund Enterprise Management System



**SSID Code** Site/Spill Identifier (The SSID code is a four-character alpha-numeric code occupying the first four positions of the Site/Project field in the agency financial system of record.)

**USCG** United States Coast Guard

**WQ** SSID code used to obligate funds to IAs, cooperative agreements, grants, and contracts when the precise amount to be charged to specific sites or actions is unknown at the time of obligation.

**ZZ** SSID code used to track costs associated with Superfund site-specific work where no SSID code has been established.

## **VI. MANDATORY REVIEW**

The next review for this policy is three (3) years. However, this policy will be reviewed and revised as warranted by new federal legislation, applicable Federal Accounting Standards Advisory Board releases, regulations, or EPA policy.

## **EXHIBIT 1. ALLOCATION OF PAYROLL, TRAVEL, AND OTHER INTRAMURAL COSTS**

All in-house operational expenses fall under the umbrella of intramural costs. These costs include salaries and benefits, and travel. EPA's basic appropriation for funding its internal operating expenses is the Environmental Program Management appropriation (also known as EPM), but superfund and oil spill intramural costs are to be charged to the Superfund or oil spill appropriation. These charges may be site-specific or non-site specific if they do not benefit a specific site, and may be applied to the Superfund or oil spill appropriation either directly or indirectly through an allocation process.

### **1. Direct Charging Intramural Costs to a Specific Site Using the Superfund or Oil Spill Appropriation**

Where EPA incurs costs that can be identified as solely benefiting a superfund or an oil spill site, the applicable site is charged directly through the agency's account code structure. For example, the hours a remedial project manager works at a site benefits only superfund. These hours must be "direct charged" to an SSID and appropriate accounting information in PPL. This exhibit outlines how intramural costs are to be directly charged.

### **2. Allocating Non-Site Specific Intramural Costs to the Superfund or Oil Spill Appropriation**

In some cases, hours worked by an EPA employee or other intramural charges cannot be identified directly with the Superfund or oil spill appropriation alone. For example, it would not be practical for the staff responsible for processing travel vouchers to measure directly how much time they spend processing Superfund versus other vouchers. In these cases, allocation of that time or other charges among appropriations is the acceptable method for distributing the time worked or costs incurred. Before incurring salaries or other intramural costs to superfund in this manner, an office must have a superfund allowance issued by the Office of the Chief Financial Officer. Allowance holders have a continued responsibility to ensure that budgetary ceilings are not exceeded, whether direct charging or allocation methods are used.

### **3. Salaries**

Where full-time equivalent and personnel compensation and benefits costs are readily identifiable and directly assignable to a superfund site, they must be charged directly to the superfund site. The primary method for charging these costs is through recording actual hours worked to the benefit of the superfund or oil spill site through PeoplePlus. All employees who perform site-specific work must ensure that the work code with the appropriate accounting information, including the appropriate SSID and action code, is included in their PPL entry to show hours chargeable to that site. Time can be tracked in 15-minute increments.

### **4. Payroll Cost Allocation Work Codes**

As part of the Payroll Cost Allocation project implemented in October 2017, the OC developed a new structure, referred to as the Work Code. There are three types of Work Codes which include the HR Work Code, Project Work Code, or the Hybrid Work. Work Codes replace the accounting strings in the Time and Attendance

System and function like recording hours on the timecard. Employees charge their time to either their HR Work Code, Project Work Code or Hybrid Work. Work Codes eliminate the previous process which used a FAN for each employee. Governance guidance for Work Codes is available on the [OC SharePoint](#).

## **5. Time Reporting**

If, during a given pay period, employees who usually perform non-Superfund related work spend time working on a Superfund activity, they must allocate their time in PPL to properly charge the Superfund appropriation for that time. Conversely, when EPA employees who usually perform Superfund work spend time during a pay period working on a non-Superfund activity, they must properly allocate all time spent between the various activities.

## **7. Approving Time**

Supervisors must review and approve time reported in PPL including site-specific charging on the designated biweekly approval day.

## **8. Travel Costs**

Where sufficient justification is present for a site charge, all superfund travel costs, such as transportation, lodging, and meals, should be charged to specific sites and activities through Concur.

The Office of the Chief Financial Officer distributes individual travel ceilings for each EPA office. Travel, as any other expense, may not exceed the amounts set forth in the budgetary ceilings. However, costs for siterelated travel performed under the provisions outlined in CERCLA are exempt from the limitations imposed on non-site related travel charged to the Superfund appropriation.

All travel authorization forms must include the EPA travel code that most nearly describes the purpose for the travel. All site-related travel should be coded with travel purpose code "1." General Superfund charges never should be coded with travel purpose code "1." Definitions and examples of the different types of travel are provided in Resource Management Directive System 2550B, *EPA Travel Policies and Procedures*.

## **9. Charging of Travel Costs**

When employee travel is for superfund purposes only, it must be charged to the appropriate superfund accounting information. If travel benefits both superfund and non-superfund programs, and the portion of the travel that benefits each program is distinguishable, the non-superfund (EPM, oil, Leaking Underground Storage Tanks, etc.) and superfund appropriations each should be charged for the actual costs incurred. For example, if a headquarters grants specialist on travel to a region spent the first day in a superfund meeting and the second day working on general grants administration issues, that employee would charge travel expenses for each day to the non-superfund and superfund appropriations, respectively. Transportation (e.g., airfare) would be split in proportion to the time spent on each activity.

Some portions of travel costs, such as transportation costs between superfund and non-superfund activities, or between superfund sites on an extended trip, may not be easily distinguishable. These costs should be

distributed on a reasonable basis, i.e., according to how much time the employee traveling spends on each activity. The travel documents should include an explanation of the basis on which the costs were divided. However, in cases where travel benefits both Superfund and non-superfund, and it is impossible to divide segments of the travel between the programs benefited, the cost should be fully charged to the program that realizes the predominant benefit.

With respect to site visits, travel should be charged to site-specific SSIDs. For site-specific visits to a location for which a Site/Spill Identifier has not been assigned, the site travel is charged to an SSID code ending with the ZZ code.

When distributing costs between sites on a multi-site trip, these charges normally are based on time. If this is not practical or feasible, a rational and reasonable basis should be used.

## **10. Reconciliation of Time and Travel Documents**

Employees must ensure that the allocation of hours entered into PPL is consistent with the allocation of travel costs on travel vouchers entered into Concur. Superfund site-specific travel costs incurred during the pay period must be charged to the same accounting information as the employee's time for the days in travel status. If all employee's time is charged to one site during the first two days of the pay period, any travel costs incurred on those two days must be charged to that site. The Cincinnati Service Center will perform quarterly reconciliations of time reported in PPL and accounts charged on the travel authorization.

## **11. Equipment and Supply Costs**

Where a purchase will benefit only the superfund program, it should be charged to the appropriate Superfund accounting information. Except for items charged to one of EPA's support accounts, items procured using superfund resources will be charged as follows:

### **A. Purchases of \$25,000 per Item or More**

Where a purchase will benefit superfund as well as other programs, the requesting office must estimate the expected superfund and non-superfund use of that item and include a justification for that estimate on the procurement request they provide to the OC and charge the superfund and nonSuperfund appropriations accordingly. Resource Management Directives System 2520, *Administrative Control of Appropriated Funds*, section J, "Split Funding with Multiple Appropriations," provides additional details about split funding for the Superfund program.

### **B. Purchases of Less than \$25,000 per Item**

Where data are available to support an equitable distribution of costs between appropriations, requesting offices must assign costs according to each program's use of the items, as in the above procedure for purchases of at least \$25,000. However, where such data are unavailable, the requesting office may choose instead to charge the entire cost of the item to the program that will

predominantly benefit. For either method, requesting offices must state on the procurement request the basis they used to assign the costs whenever more than one appropriation will benefit from the purchased item. The OC is responsible for approving split funding requests, as described in Section 11A above.

### **C. Rentals**

Distribution of rental costs will follow the same policies as stated in Sections 11A and 11B above, except that under \$10,000 per item per year replaces the under \$25,000 maximum costs allowable for charges made on a "predominant use" basis.

If audited, offices are not expected to produce written documentation of actual usage of equipment or supplies above or documentation beyond the records that are kept for other purposes. Offices must be able to provide information that support decisions on how to charge items bought for partial or total superfund use.

## **12. Reconciliation of Payroll, Travel, and Training**

Employees must ensure that the allocation of payroll and travel costs is consistent with the allocation of training costs. If site travel is charged during training, the costs for payroll and training need to be charged to the same accounting information.

## **Exhibit 2: Frequently Asked Questions and Answers to Recording and Allocating Costs Not Immediately Attributable to Specific Superfund Sites.**

1. What policy governs WQ, ZZ, 00 identifiers costs?

[RMDS 2550D-04-P1, Direct Charging of Superfund Costs Site-Specific Cost Accounting Methods](#) provide the roles, responsibilities, and processes to account for superfund and oil spill site-specific costs.

2. What is the purpose of the [Action Code Dictionary](#) in relation to WQ and ZZ identifiers?

The action code dictionary identifies the allowable site designators (site-specific, WQ, ZZ, or non-sitespecific), which dictate what types of Site/Spill Identifier codes may be used for that action code. The WQ identifier may also be used as an action code, and should be redistributed to a site-specific SSID or the 00 identifier based on the action code the funds will be redistributed to.

3. What is the purpose of the WQ and ZZ identifiers?

The WQ and ZZ identifiers are temporary holding accounts for costs not immediately attributed to specific superfund sites. Costs may not remain in either WQ and/or the ZZ identifier for an indefinite time.

4. Must an SSID be established for sites?

The regional program office (i.e., the regional removal, remedial, Federal facilities, or enforcement organizational units) will make the determination to establish a new SSID code. For Removals, the SSID code should be established no later than when extramural funds are obligated for removal cleanup action. For Remedial, the SSID code should be established during or after the preliminary assessment/site inspection stage when further federal response action is determined to be necessary. Program Offices should provide an explanation for deciding whether or not to setup an SSID (i.e., a remedial program with no further federal response action is necessary). Decisions concerning SSID codes should be documented in accordance with RMDS 2550-D-12, Superfund Cost Documentation and Cost Recovery and Program Offices.

5. When should costs be redistributed to an SSID?

When an SSID is established all costs, with limited exceptions, are redistributed to the established SSID. The limited exceptions to redistributing costs to an SSID only include costs that cannot be identified or easily allocated to specific sites (ZZ intramural and cooperative agreement disbursements are not required due to the complexity associated with tracking site-specific costs outside agency systems). The limited exceptions to redistributing costs to an SSID must be moved from the ZZ identifier and redistributed to the 00 identifier.

6. What policy governs the documentation of superfund transactions?

Superfund transactions are to be documented in accordance to [RMDS 2550D-12, Superfund Cost Documentation and Cost Recovery](#), and [RMDS 2550D-12-P1, Superfund Cost Documentation and Cost Recovery Procedure](#).