

 **OPENTHEBOOKS OVERSIGHT REPORT**

U.S. ENVIRONMENTAL PROTECTION AGENCY

**QUANTIFYING AGENCY OPERATIONS DURING
FISCAL YEARS 2018-2022**





ENVIRONMENTAL PROTECTION AGENCY

QUANTIFYING AGENCY OPERATIONS DURING FISCAL YEARS 2018-2022

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Dedicated to Dr. Tom Coburn

OpenTheBooks Honorary Chairman
Rest In Peace - March 28, 2020

By Adam Andrzejewski
Founder/CEO

Thomas W. Smith
Chairman

*"OpenTheBooks is doing the work I envisioned when the Coburn-Obama bill became law.
Their innovative app and other tools are putting sunlight through a magnifying glass."*

U.S. Senator Tom Coburn, MD
Washington, D.C. | March 11, 2014

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*"I know that restoring transparency is not only the surest way to
achieve results, but also to earn back the trust in government..."*

U.S. Sen. Barack Obama



PROLOGUE

THE ENVIRONMENTAL PROTECTION AGENCY HAS A SHORT, SIMPLE MISSION: "TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT."

Founded by Richard Nixon in 1970, different administrations and parties have taken different approaches to the size and scope of the EPA mission—what toxic chemicals should the agency regulate? What is an acceptable amount of environmental contaminants in air or water? What constitutes an environmental hazard and what tools can a government agency use to enforce its undergirding principles?

While some administrations worked to constrain the EPA's regulatory power and budget, the agency today has expanded considerably since 1970. With over 15,000 staffers as of FY 2022, the agency has law enforcement, homeland security, and legal teams working to enforce and develop environmental policies. In the past two years alone Congress has appropriated the agency over \$100 billion, much of it intended to bolster the agency's decades-long vision of bringing about "environmental justice."

The EPA does so much more than protect water sources and clean up toxic waste sites, and the auditors at OpenTheBooks.com have endeavored to show Americans what they're paying for—and how much they're paying for it.

WHO WE ARE

American transparency is a public charity. We do not accept government money. Our oversight reports present hard data so citizens, media, think tanks, politicians, and watchdogs can "follow the money." Hard facts are non-partisan and enhance the public discourse.

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SCOPE AND METHODOLOGY

OpenTheBooks auditors used spending data gathered from federal checkbook database USASpending.gov, and salary data via agency FOIA request. Salary data for federal agencies, states, and local governments is posted on OpenTheBooks.com.

The report primarily covers fiscal years 2018-2022, although data from earlier years or later years is occasionally used to add context. Other information regarding agency spending or activities was collected via online resources. Citations are provided as hyperlinks within the text.

Spending figures are not adjusted for inflation.

This oversight report does not study the impact of EPA regulation on the environment or commerce. Our report is only financial in scope.

Journalists, organizations, oversight committees, politicians and watchdogs are encouraged to review the facts delineated in our report and continue to investigate.



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TOP 10 TAKEAWAYS

1. THE EPA'S REGULATORY MANDATE and budget are both expanding considerably. As the agency is tasked to write more regulations combatting climate change, over \$100 billion more dollars in federal funds have been allocated to the EPA to spend in new grants.

- American Rescue Plan of 2021: \$100 million
- Infrastructure Investment and Jobs Act of 2021: \$60 billion
- Inflation Reduction Act of 2022: \$40 billion

2. "ENVIRONMENTAL JUSTICE" has been an agency priority since the 1990s, but has accelerated under the Biden administration due to new executive orders, a new Office of Environmental Justice and External Civil Rights, and billions of dollars in new funding to direct towards environmental justice-related goals.

Grant spending specifically tagged with the words "environmental justice" went from about \$5.6 million in FY 2021 to over \$14 million in FY 2022, but Biden administration executive orders have made clear the entire agency must be oriented around environmental justice.

3. IN 2023 THE EPA'S OWN INSPECTOR GENERAL said in a Congressional hearing that the agency had so much new funding that it could not be properly audited.

The \$41.5 billion from the Inflation Reduction Act, set to begin spending in fiscal year 2023, did not include any funds for oversight activities. Inspector General Sean O'Donnell said, "Without adequate resources, not only have we been unable to do any meaningful IRA oversight, but we have also had to cancel or postpone work in important EPA areas, such as chemical safety and pollution cleanup."

4. THE EPA ANNOUNCED A "HIRING SPREE" in 2021, bringing staffing levels to over 15,000 from about 14,700. For FY 2024 the EPA's budget proposal asks for over 17,000 full-time equivalent staff.

Interestingly, the EPA employs 223 public affairs officers, costing taxpayers over \$100 million since 2018.

5. AVERAGE EPA SALARY in FY 2022 was \$124,252, with a total compensation for all 15,043 employees of \$1.9 billion.

Forty EPA staffers are under schedule 42, a designation for scientists and other research professionals that helps boost pay. The six highest paid EPA employees are schedule 42 employees, each making \$250,000 in FY 2022. The EPA Administrator Michael Regan took home \$183,100 that same year.

6. THE EPA HAS A LAW ENFORCEMENT ARM responsible for bringing environmental criminals to justice. In FY 2023 appropriations for the Criminal Enforcement Program were \$70.7 million. This spending does not include EPA's Office of Homeland Security. Originally set up in response to 9/11, EPA documents state the office's mandate has since expanded "and several areas (e.g., climate, natural disasters) now involve engagement from the broader national security community." EPA budgeted \$89 million for Homeland Security activities in FY 2023.

7. THE EPA EMPLOYS 137 SPECIAL AGENTS WITH ARREST AND FIREARM AUTHORITY. Between 2018-2022 EPA spent \$618,602 on guns, ammunition, and military-style equipment, including body armor, optical sights, night vision equipment, security vehicles, and tactical sets, kits, and outfits.

8. IF THE EPA LEGAL TEAM WAS A PRIVATE LAW FIRM, then it would currently rank as the 34th largest law firm in America with 1,022 "general attorneys" (and one "patent attorney") in FY 2022.

Last year this crew collectively received \$157,267,047 in compensation. 960 of the attorneys make over \$100,000, and 18 make over \$200,000. FY 2022 has seen the highest total compensation for the general attorney workforce, swelling from 989 staffers and \$146 million compensation in FY 2018.

9. FROM FY 2018-2022 THE EPA HAS ENGAGED IN 66,109 CONTRACTING TRANSACTIONS amounting to \$6,406,870,570, averaging about \$1.3 billion a year.

EPA contract spending decreased during the Trump administration and jumped about \$400 million in the first fiscal year of the Biden administration.

Spending includes \$15 million on furniture and \$244,466 on various awards for EPA staff.

10. BETWEEN 2018 AND 2022, THE EPA MADE 29,093 TRANSACTIONS WITH GRANTEES, worth \$26,459,600,452. On average, this works out to \$5.3 billion per year, or a little more than half of the EPA's annual budget in this time.

About 89% of this money, over \$23.7 billion, was distributed to state or local governments (not including higher education). The biggest government grant recipients were California (\$2.2 billion) and New York (\$1.5 billion).

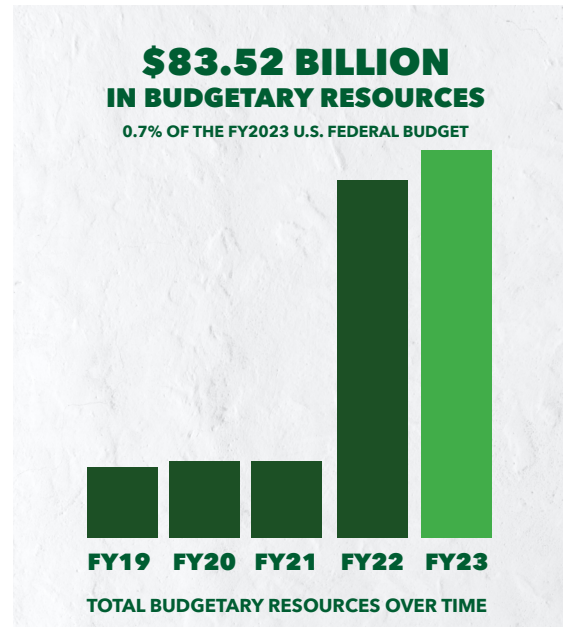
THE EPA TODAY

Over the past five years, two presidential administrations have had, at times, wildly different ideas of what the EPA should do.

Generally, the Trump administration attempted (not always successfully) to reduce EPA's workforce, budget, and regulatory and enforcement power.

The Biden administration—and a sympathetic Congress—reversed course, tasking the agency with new rulemaking powers and appropriating over \$100 billion in new spending over the next few years.

FISCAL YEAR	ENACTED BUDGET
2023	\$10,135,433,000
2022	\$9,559,485,000
2021	\$9,237,153,000
2020	\$9,057,401,000
2019	\$8,849,488,000
2018	\$8,824,488,000



Recent regulatory events at the EPA underscore the economy-wide impact of the agency. For example, just this year:

- In April EPA rolled out new [proposals](#) limiting tail-pipe emissions. The agency estimated that, if enacted, 67% of passenger vehicles produced from 2032 forward would be electric.
- In May the EPA proposed new rules for carbon, methane and hydrofluorocarbon emissions. The proposal would require, for [example](#), natural gas plants to install carbon sequestration devices that remove 90% of carbon emissions by 2035.
- In June the EPA proposed a [new rule](#) that would require the elimination of dust from lead paint in older homes and schools. While lead paint was phased out in 1978, about 31 million homes still have lead paint on their walls, and more than 15 million students were enrolled in school districts that have buildings containing lead-based paint.

With a huge amount of funding and new regulatory powers, it is worthwhile to explore how tax dollars are being spent at the EPA.

ENVIRONMENTAL JUSTICE (EJ)

No discussion of EPA spending could be complete without “environmental justice” (EJ), a major Biden administration priority that is receiving a huge amount of funding through the EPA and other agencies.

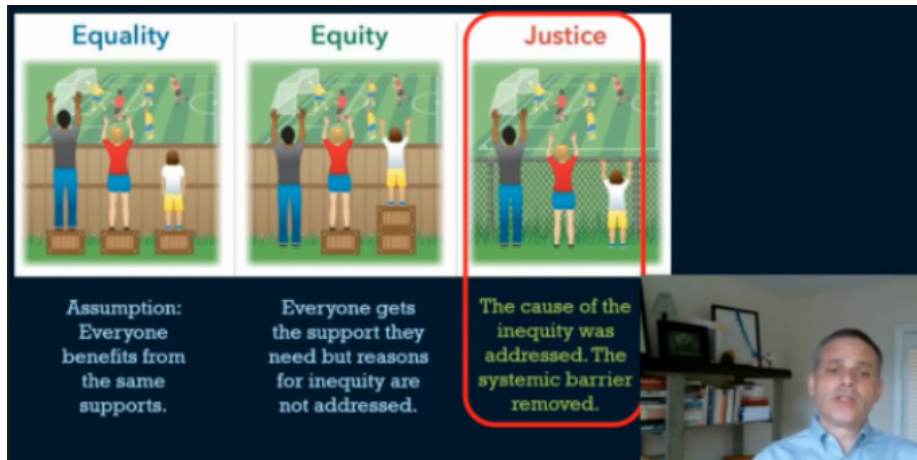
The Biden EPA has frequently stated that EJ concepts will be infused into every aspect of the agency, so a baseline knowledge of what defines EJ is critical to understanding all other spending decisions at the agency.

According to the EPA’s Environmental Justice webpage:

“Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys:

- The same degree of protection from environmental and health hazards, and
- Equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”

Other EPA resources [clarify](#) that “fair treatment” means “no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.”



In [June 2021](#) Biden Office of Environmental Justice administrator Michael Tejada explains the underlying philosophy of his office, and the broader agency, uses to tackle “equity” and “justice” problems, explaining how “inequities” between “outcomes” are a result of policies that sometimes go back hundreds of years:

“At EPA you need to pursue environmental justice, not just equity.

“Justice recognizes that there are inequitable outcomes across the United States but there are reasons why those inequitable outcomes exist, and a lot of those reasons have to do with statutes, with policies – with decisions about things like resources throughout the entire history of the United States and way before the United States was founded, and figuring out what those reasons are for the inequity or the injustice, and then doing something about the reason. That’s practicing justice, so it’s a little – it’s different from equity, okay?”

“Equity is trying to close the gap; justice is about finding the reason for the gap, and doing something about that reason. So it’s important to have both.”

EJ UNDER BIDEN: NEW MONEY

The Biden EPA, with the help of Congressional appropriations, has been able to funnel billions of dollars into its EJ agenda while directing the use of these funds through executive orders. This section covers the most substantial regulatory and spending activities on behalf of EJ during the Biden administration so far.



Executive Order (EO) 14008

One of the first actions the Biden administration took was Executive Order 14008 - Tackling the Climate Crisis at Home and Abroad, which among other items, rolled out the [Justice40 initiative](#). Justice40 mandates that 40% or more of the benefits of some federal programs related to the environment and energy flow to “disadvantaged communities.”

The EPA [identified](#) 73 programs that fit Justice40 standards, some of which would receive funding from subsequent Congressional appropriations outlined below.

Along with Justice40, the 2021 executive order developed the “[Environmental Justice Scorecard](#)” through the White House Environmental Justice Interagency Council and the White House Environmental Advisory Council—two new committees the executive order also created.

Through the EJ Scorecard every agency, including EPA, must assess how it is meeting EJ goals and incorporating them into every aspect of their work, including efforts to implement Justice40.

A few months after EO 14008, Congress passed the American Rescue Plan (ARP) of 2021, a \$1.9 trillion economic stimulus bill. EPA received [\\$100 million](#) from ARP to “address health outcome disparities from pollution and the COVID-19 pandemic.”

The funding was split between air monitoring initiatives and environmental justice programs. Funding within the EJ programs [included](#):

- \$16.65 million was used for EJ-related grants
- \$7 million went to replacing diesel school buses with electric at “underserved and tribal schools”
- \$5.13 million went to expand enforcement activities near “low-income communities”
- \$5 million went to mediate Brownfields
- \$1 million in administration costs
- \$700,000 to enhance development of “EJSCREEN,” a digital tool published in 2015 identifying “vulnerable communities” most likely to be eligible for EJ-related grants

As of January 2022, about 67% of total ARP funds had been spent.

Funding provided by ARP seemed like a test run for the billions of dollars to come. The 2021 Infrastructure Investment and Jobs Act (IIJA) and the 2022 Inflation Reduction Act (IRA) have pumped unprecedented billions into the EPA to be spent over the next few years.

Hard spending data is only available through FY 2022, but news reports and agency press releases provide some insight into how money is moving through the agency in both contracts and grants.

American Rescue Plan Real Spending

First published in [RealClearPolicy](#):

Reports on EPA spending through ARP noted 99 organizations had been awarded grants in 2021, some with seemingly no connection to COVID-19.

One project, a nonprofit named Speak for the Trees, used its grant money for storytelling and tree walks to “increase awareness and dialogue surrounding inequitable tree canopy cover and its implications on the health of residents living in [environmental justice] communities,” according to [Fox News](#).

Another nonprofit, Teaching Responsible Earth Education, received funding to “establish an empowering, school curriculum-integrated environmental education program for younger students propelling their awareness of problems like climate change and the injustices they create.”

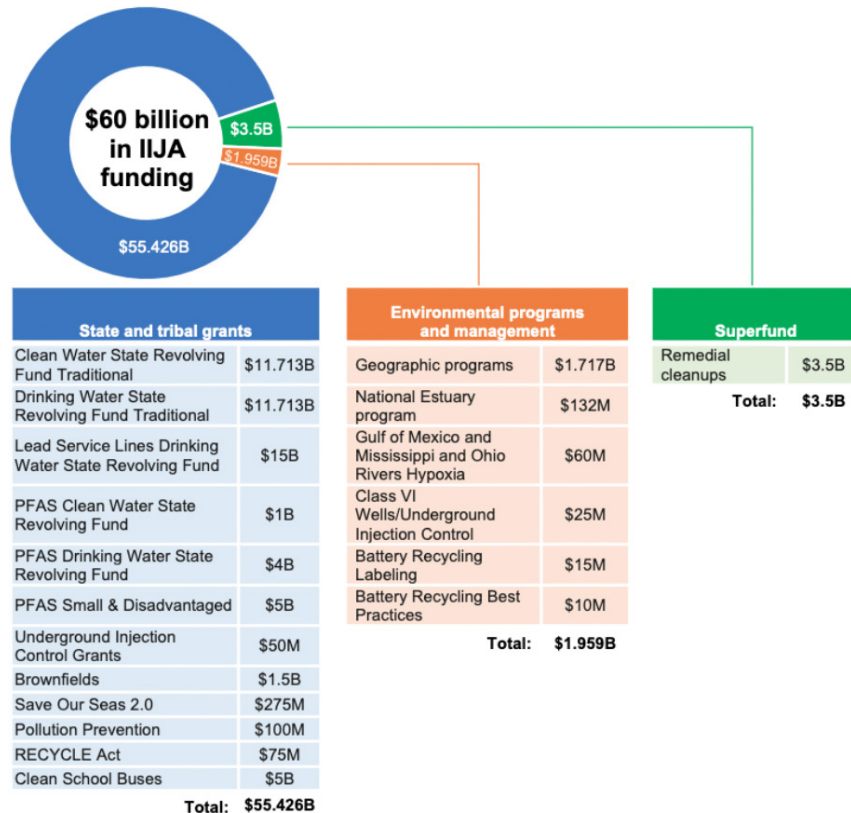
Other grants went to projects like building electric vehicle charging stations.

Infrastructure Investment and Jobs Act of 2021

IJA, signed into law November 2021, appropriated \$60 billion to the EPA for fiscal years 2022-2026. Spending will be issued [as follows](#):

- \$14.1 billion in FY 2022
- \$11.2 billion in FY 2023
- \$11.6 billion in FY 2024
- \$12.0 billion in FY 2025
- \$12.0 billion in FY 2026

Table 1: IJA funding by program



Notes: B = Billion; M = Million; PFAS = Per- and Polyfluoroalkyl Substances.

Source: EPA, [FACT SHEET: EPA & The Bipartisan Infrastructure Law](#), November 6, 2021. (EPA OIG table)

According to a first-anniversary [report](#) released by the agency:

Most of this funding (\$50 billion) is intended for “clean water and drinking water projects” which includes replacing lead service lines, “addressing” per- and polyfluorinated substances (PFAS) pollution (a toxic chemical), and “broadening efforts to protect critical water bodies that are important to communities and the economy.”

- \$5 billion will go towards cleaning up Superfund and Brownfield sites, and “improving waste management and recycling systems.”
- \$5 billion for “decarbonizing the nation’s school bus fleet.”
- \$100 million for the “Pollution Prevention Program” intended to help businesses reduce pollution at the source.
- While \$14.1 billion was allocated in FY 2022 (which began in October 2021), only \$5.5 billion was actually spent as of November 1, 2022. Spending was made through grants, contracts, interagency agreements, and implementation costs.

Inflation Reduction Act of 2022

IRA gave EPA \$41.5 billion in funding for “24 new and existing programs,” according to an agency publication. Spending categories include:

- \$27 billion to fund new and existing “green banks” and for “state and local government investment in distributed energy and other clean technologies.”
- \$5 billion for Climate Pollution Reduction Grants to state, local, and tribal governments to [develop](#) and implement plans for reducing air pollution and greenhouse gas emissions.
- \$3 billion in Environmental and Climate Justice Block Grants to fund “community-based nonprofit organizations.”
- \$3 billion in Grants to Reduce Air Pollution at Ports so ports can design “climate action plans” and install “zero-emission technology”
- \$1.55 billion for the Methane Emissions Reduction Program to fund grants to reduce emissions from oil and gas sectors.
- \$1 billion to replace heavy duty vehicles with “zero-emission alternatives.”

In November 2022 the EPA began soliciting public comments on how to spend \$13 billion in IRA funding.

Expenditures under IRA are gearing up in FY 2023, with [hundreds of millions of dollars](#) in grant funding announced in the new year.

In September 2022 the EPA [opened](#) the Office of Environmental Justice and External Civil Rights, to “oversee the implementation and delivery of a \$3 billion climate and environmental justice block grant program created by the Inflation Reduction Act.”

According to acting principal deputy assistant administrator Marianne Engelman Lado, the new office will also work to “infuse equity, civil rights and environmental justice principles into all of [EPA’s] practices, policies and programs.” Engleman Lado added that the agency is adding 200 new employees to staff the office.

An activist interviewed by the *Washington Post* shortly after the Office was announced [stated](#):

“[Environmental justice] will now become a part of the institutional fabric of EPA. It’s going to take a hell of a lot to try to unravel that going forward.”

In April 2023 President Biden issued an [executive order](#) on “Revitalizing Our Nation’s Commitment to Environmental Justice for All.”

Some of the EO’s priorities include improving “equitable access to parks,” “facilitating an equitable transition of the workforce as part of a clean energy future,” and ensuring “affordable options for housing, energy, and transportation.”

“Under this order,” Biden said at the signing ceremony, “environmental justice will become the responsibility of every single federal agency – I mean, every single federal agency.”

The EO requires agencies, among other things, to create “environmental justice strategic plans” under the guidance of the White House Council on Environmental Quality. The plans are meant to “address opportunities through regulations, policies, permits, or other means to improve accountability and compliance with any statute the agency administers that affects the health and environment of communities with environmental justice concerns.”

It is not clear how much funding will be necessary to implement this EO at the EPA or the other federal agencies.

NEW MONEY OVERSIGHT

Tens of billions of dollars in new spending in such a short time period would overwhelm any organization, and the EPA is no exception. In March 2023 Sean O’Donnell, EPA’s inspector general, gave Congressional [testimony](#) on IIJA and IRA oversight so far, highlighting the difficulty oversight officials have had in reviewing these funds for waste, fraud and abuse.

Infrastructure Investment and Jobs Act (IIJA)

During his testimony O’Donnell said of the \$60 billion in IIJA funding to EPA:

“Such an enormous investment in American infrastructure requires a robust oversight mechanism to protect American dollars, especially as most of the EPA’s IIJA funds will flow to nonfederal entities with potential capacity and capability issues. It is also critical to monitor program progress and to determine whether the Agency accomplished its promised program outcomes.”

An IIJA oversight [progress report](#) published March 2023 acknowledged ongoing problems with oversight, while providing some solutions:

“EPA leadership needs to commit the Agency to proactively address problem areas by effectively overseeing its program partners. Most of the infrastructure funding will flow through these partner programs. The Agency should, therefore, commit to improving its capacity to oversee these partner programs and develop a framework for addressing identified oversight issues.”

The First Anniversary Report for the IIJA, published November 2022, emphasized that the agency would “continue to work closely with our Inspector General’s Office to mitigate risk for waste, fraud, and abuse,” but funds allocated to the Inspector General’s Office had the lowest spend rate of all categories—just 3%. As of November 2022, of the \$64.573 million allocated, only \$1.998 million was spent on Office of the Inspector General activities.

INFLATION REDUCTION ACT OF 2022 (IRA)

As IRA spending begins to kick into gear for FY 2023, O'Donnell stressed that monitoring the \$41.5 billion from this law is even more challenging than the funding from IIJA, because IRA allocated no funding at all for oversight at the EPA. He followed with:

"Without adequate resources, not only have we been unable to do any meaningful IRA oversight, but we have also had to cancel or postpone work in important EPA areas, such as chemical safety and pollution cleanup."

O'Donnell highlighted that IRA funds were more susceptible to fraud, waste, and abuse than IIJA funds because 1) IRA funding will create more new programs, which are generally more prone to errors and 2) IRA funding has far more spending expiration dates than IIJA. \$27 billion, or 65%, of IRA funding must be spent by the end of fiscal year 2024, and another \$7.93 billion, or 19%, must be spent by the end of fiscal year 2026.

ENVIRONMENTAL JUSTICE BEFORE BIDEN

While the Biden administration has put a historic amount of funding towards the cause, environmental justice has been a part of the EPA for decades; the agency unveiled its first "[Environmental Justice Strategy](#)" in 1995, following President Clinton's 1994 executive order "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."



Clinton EPA administrator Carol Browner said at the time:

"We will develop strategies to bring justice to Americans who are suffering disproportionately..."

"We will develop strategies to ensure that low-income and minority communities have access to information about their environment--and that they have an opportunity to participate in shaping the government policies that affect their health and environment."

EJ initiatives at EPA continued to be built out in all subsequent administrations.

An EPA [fact sheet](#) highlights some of the notable moments in EJ since 1994, including:

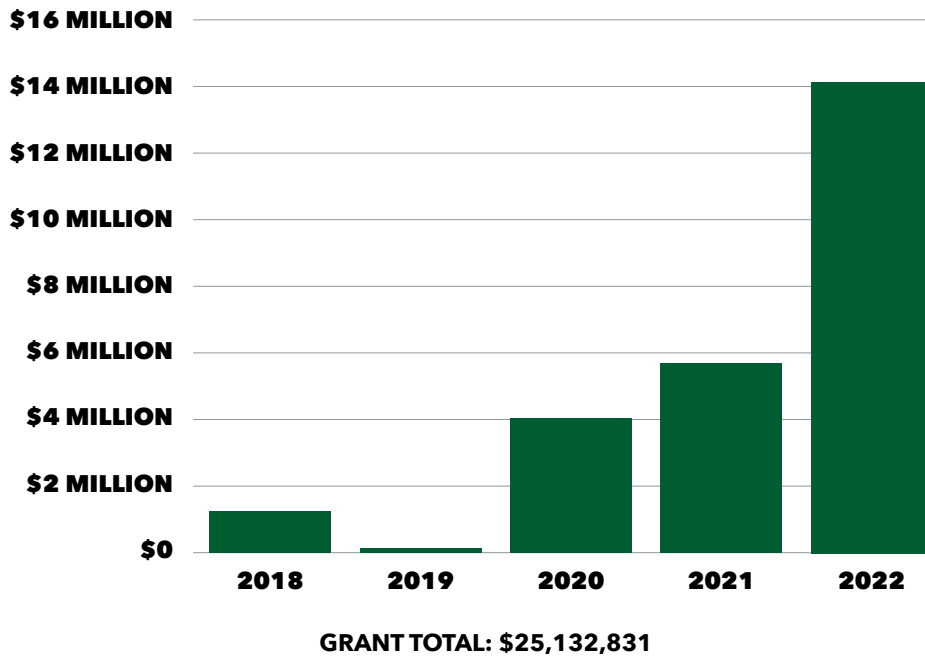
- **2003:** EPA offices developed and began implementing environmental justice action plans.
- **2005:** EPA produced an "EJ Toolkit for Assessing Potential Allegations of Environmental Injustice" to help conduct "environmental justice assessments."
- **2009:** EPA funded the "[Environmental Justice Showcase Communities Program](#)," which "brings together governmental and non-governmental organizations to pool their collective resources and expertise on the best ways to achieve real results" in ten selected communities. Each community received \$100,000 for two years and was meant to act as a blueprint for later EJ initiatives.
- **2014:** [EJ Legal Tools](#) is launched. This is a "compilation of legal authorities available to EPA for identifying and addressing the disproportionate impact of pollution on underserved and overburdened communities."
- **2015:** EPA publishes [EJScreen](#), a mapping program intended to identify "environmental justice communities" more likely to receive EJ-related funding or other resources.

The Trump administration [attempted](#) to curtail some EJ spending, including by proposing (unsuccessfully) to eliminate the Office of Environmental Justice’s then-\$6.8 million annual budget for FY 2018.

Despite this seemingly hostile posture towards EJ, the EPA published [Environmental Justice Progress Reports](#) every year of the Trump administration, detailing EJ-related projects worth hundreds of millions of dollars. The [last report](#) published by the Trump administration, in 2020, highlighted:

- \$160 million in grant funding “to support low income and minority communities” for programs like cleaning up Brownfields, reducing port emissions, and providing job training.
- \$4.3 million for a new grant program to increase lead testing on Tribal land.
- A [Clearing House for Environmental Finance](#) to make it easier for communities to find grants and other resources available at EPA.
- Repurposed \$1 million in EJ grants to develop new technical guidance in response to COVID-19.

ENVIRONMENTAL JUSTICE GRANT SPENDING



Grants, unlike contracts, have EJ-specific spending categories. The above graph is for spending under the labels “environmental justice collaborative problem-solving cooperative agreement program,” “environmental justice small grant program,” “state environmental justice cooperative agreement program,” and “surveys, studies, investigations, training, and special purpose activities relating to environmental justice.”

The following sections will discuss the EPA workforce, and contract and grant spending between 2018-2022. While not all funding is directly related to EJ, it is important to keep in mind that EJ principles are meant to be incorporated into every aspect of EPA operations, including the deployment of grant and contract resources.



EPA WORKFORCE

In February 2023 members of the American Federation of Government Employees (AFGE) Council 238—a union representing roughly half of EPA employees—[converged](#) on Capitol Hill to lobby Congress for more staff, more pay, more remote work, and better career advancement opportunities.

According to the [New York Times](#), staffers at the agency are under stress due to demands from the Biden administration to write new climate regulations and from Congress to distribute billions in new grant spending.

The EPA announced a “hiring spree” in 2021 to support the agency-relevant goals of the Bipartisan Infrastructure Act (also known as Infrastructure Investment and Jobs Act, or IIJA). Deputy Administrator Janet McCabe [stated](#) at the time, “One of my top priorities is moving quickly to hire 1,000+ highly qualified team members across the agency,” which would have brought staffing levels to over 15,000—a target achieved for fiscal year 2023.

According to the February 2023 demands from AFGE Council 238, however, at least 20,000 staff are needed to fulfill the agency’s mission. The EPA FY 2024 [budget proposal](#) provides \$12.083 billion and 17,077 full time employees.

Another demand from the AFGE Council 238 is more remote work flexibility, which was not supported by the agency. [Currently](#) rank-and-file staff at EPA can work from home up to four days a week. While that policy remains unchanged, new agency rules state managers and supervisors will have to begin working in the office at least four days per two-week pay period, starting in August of this year.

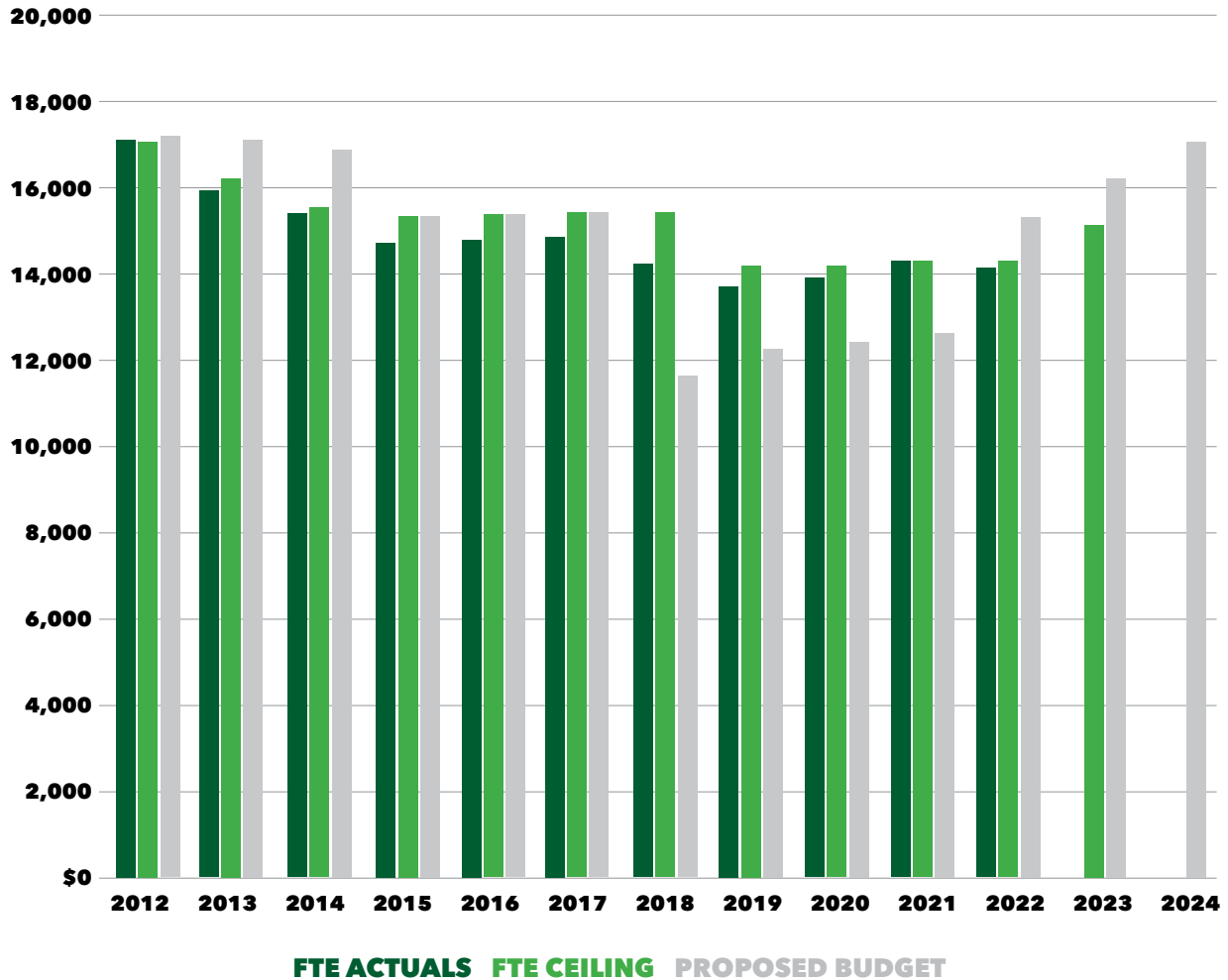
As the agency attempts to recruit thousands of new staffers, EPA’s workforce trends and current composition deserve a closer look.

HIGHLIGHTS

- In FY 2022 the EPA had 15,044 people on payroll with an average salary of \$124,252. There were 152 individual job classifications.
- Total annual compensation at EPA amounted to about \$1.9 billion in FY2022.
- 11,663 employees, or about 77% of all staff, took home \$100,000 or more in compensation, not including other benefits.
- 282 EPA staffers earn more than current EPA Administrator Michael Regan, whose salary was \$183,100 in FY2022.
- Six employees tie for highest paid at \$250,000, all based in EPA’s Durham, North Carolina office
- 259 EPA employee names are redacted from public reporting, most of whom (217) are classified under “Criminal Investigation.”

EPA FTE WORKFORCE BY YEAR 2012-2022 FULL-TIME EQUIVALENT (FTE) HEADCOUNT

ACTUAL, CEILING, AND PROPOSED FROM 2012-2024



Source: EPA Congressional justifications.

The federal fiscal year (FY) runs from October 1 to September 30, so FY 2023, for example, begins October 1, 2022, and ends September 30, 2023.

Between FY 2012 and FY 2022 the EPA workforce fluctuated between a high of 17,105.6 full time equivalent (FTE) employees in FY 2012 and a low of 13,686.9 in FY 2019—a difference of 3,418.7.

In federal accounting, one **FTE equals** “one employee working full time for a full year (52 weeks X 40 hours = 2,080 hours), or the equivalent number of hours worked by several part-time or temporary employees.”

Overtime, unpaid leave, and ceiling-exempt employees are **not** included in FTE totals. The number of staff receiving a paycheck from an agency in a given fiscal year is then likely to be higher than the FTE number.

Each year, the President proposes a budget for FTE in each agency in line with his or her policy priorities. Congress then decides how much funding agencies receive through the appropriation process, which in turn decides the FTE “ceiling,” or the maximum number of FTE staff an agency can have without going over its budget. The FTE “actuals” are how much FTE was used throughout the fiscal year and should therefore be equal to or less than the FTE ceiling.



Proposed, ceiling, and actual FTE were all trending downward by the end of the Obama administration. The last fiscal year the Obama administration proposed a budget for—FY 2017—saw an actual EPA staff of 14,217.2.



President Trump assumed office with a promise to drastically shrink federal agencies, **singling out** the EPA in particular on the campaign trail by vowing to dismantle the agency “in almost every form. We’re going to have little tidbits left, but we’re going to take a tremendous amount out.” While his first EPA budget proposed cutting the EPA workforce to 11,611.4 FTE for FY 2018, actual numbers were only reduced by about 600, to 14,217.20.

Trump’s proposed EPA budgets never rose higher than 12,611 FTE, but the Congressionally-allocated FTE ceiling at that time never dipped below 14,172 FTE. Actual FTE got as low as 13,686.9 in FY 2019 before rebounding to 14,272.10 in FY 2021—the last year the Trump administration proposed a budget.



Since taking office, President Biden has vowed to aggressively increase EPA staffing levels, proposing 17,077.4 FTE in his FY 2024 budget. However, actual staffing levels were last recorded as 14,142.80 FTE for FY 2022— 129.3 lower than they were in FY 2021. It remains to be seen whether Congress will allocate spending to meet this proposal—and whether EPA can find and hire the employees the agency claims to need.

CASE STUDY: THE OFFICIAL NUMBERS, FTE

The EPA Spending and Budget [webpage](#)—the most easily accessible repository of EPA workforce and budget information year over year—has not been updated with “FTE actuals” numbers since FY 2016. The webpage says that “The FY 2017 workforce levels reflects the FTE ceiling pending final actuals.”

Although much time has passed since then, the numbers for FY 2017 and subsequent years were never updated to reflect FTE actuals, and instead used ceiling numbers, making FTE levels seem much higher in some years than reality.

An official website of the United States government [Here's how you know](#)

EPA United States Environmental Protection Agency

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EPA's Budget and Spending

Fiscal Year	Enacted Budget	Workforce
FY 2023	\$10,135,433,000	15,115
FY 2022	\$9,559,485,000	14,581

Budget Resource Use

- [Financial and performance reports](#): see how EPA managed its

*FY 1970-FY 2016 workforce levels reflect FTE actuals. The FY 2017 workforce level reflects the FTE ceiling pending final actuals.

[Contact Us](#) to ask a question, provide feedback, or report a problem. LAST UPDATED ON FEBRUARY 28, 2023

Screenshot from EPA Spending and Budget webpage taken April 14, 2023

EPA officials of course know what the actual FTE numbers are—they are available in agency Congressional Justification documents also posted on the EPA website. When asked for the actual FTE numbers for FY 2017 via email, an agency spokesperson responded with the correct answer: 14,824. The number listed on the [webpage](#) is 15,408.

Why is this significant? Because the public and media use this resource to make misinformed claims about the Trump administration.

As recently as January 2023 the *New York Times* [reported](#) the EPA workforce numbers took a “sharp dip” during the Trump presidency, claiming “when Mr. Trump entered the White House, the E.P.A. had 15,408 employees. The following year it dropped to 14,172 employees, a level that stood more or less steady until the Biden administration.”

The newspaper confuses FTE for number of employees, but the “sharp dip” is also less substantial than reported—606.8 FTE, rather than 1,236. The *Times* story was republished in local papers like the [Buffalo News](#) and [Seattle Times](#).

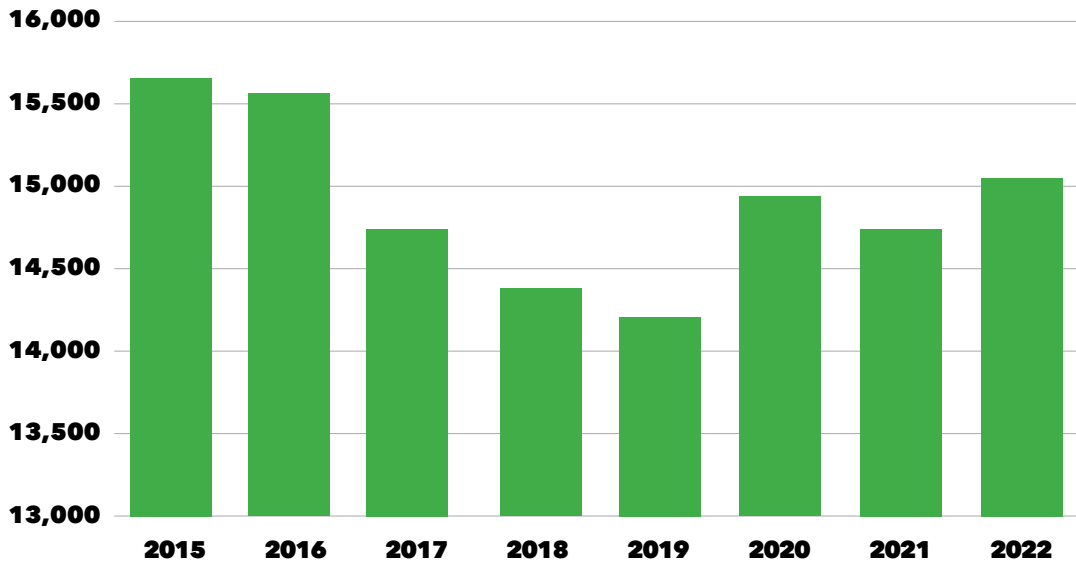
We requested comment from agency staff as to why the webpage’s numbers have not been updated to reflect FTE actuals since FY 2016, and did not hear back by the time of publication.

CASE STUDY: THE OFFICIAL NUMBERS, PAYROLL

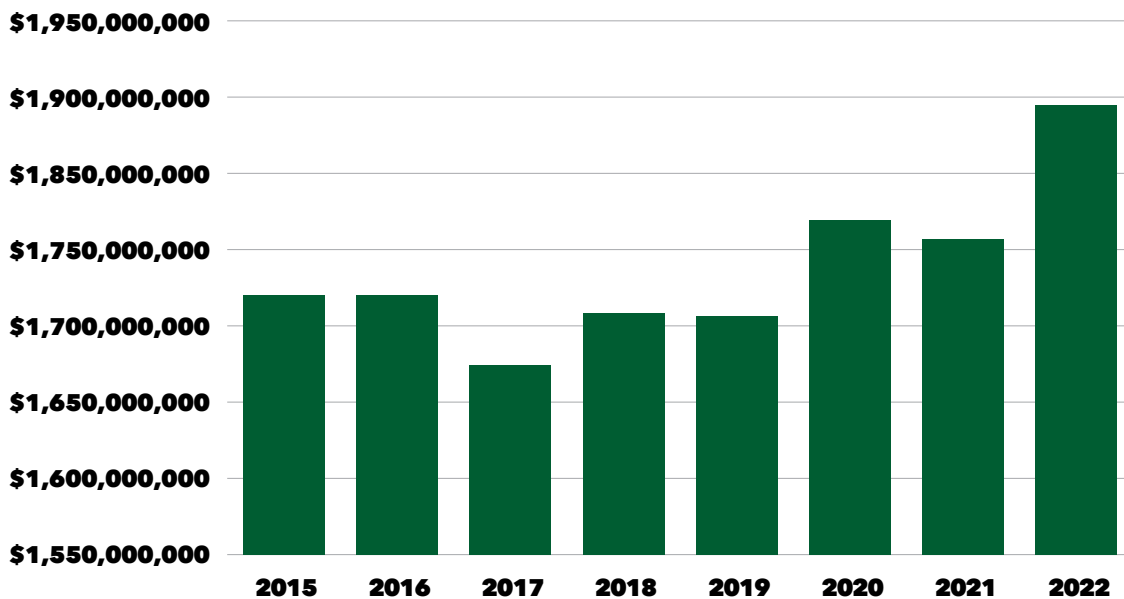
Another way of measuring the number of staff at an agency is through its payroll. OpenTheBooks.com collects the names, positions, and salaries of every staffer at the civilian federal agencies.

Records show similar trends to the FTE actuals: staff numbers declined during the first years of the Trump administration, began to rebound by FY 2020, and after dipping in 2021, increased again in 2022.

EPA EMPLOYEES ON PAYROLL



SUM OF TOTAL COMPENSATION

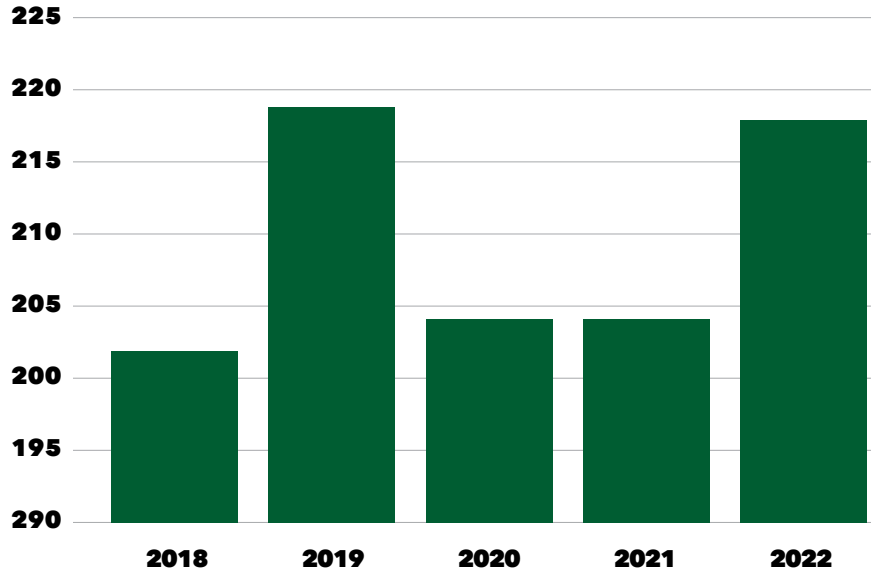


Total compensation and numbers of staffers on the EPA payroll, not adjusted for inflation. "Total number of EPA Employees" is the number of staff who received a paycheck, which is not the same as full-time equivalent measurements, explained in an earlier section.

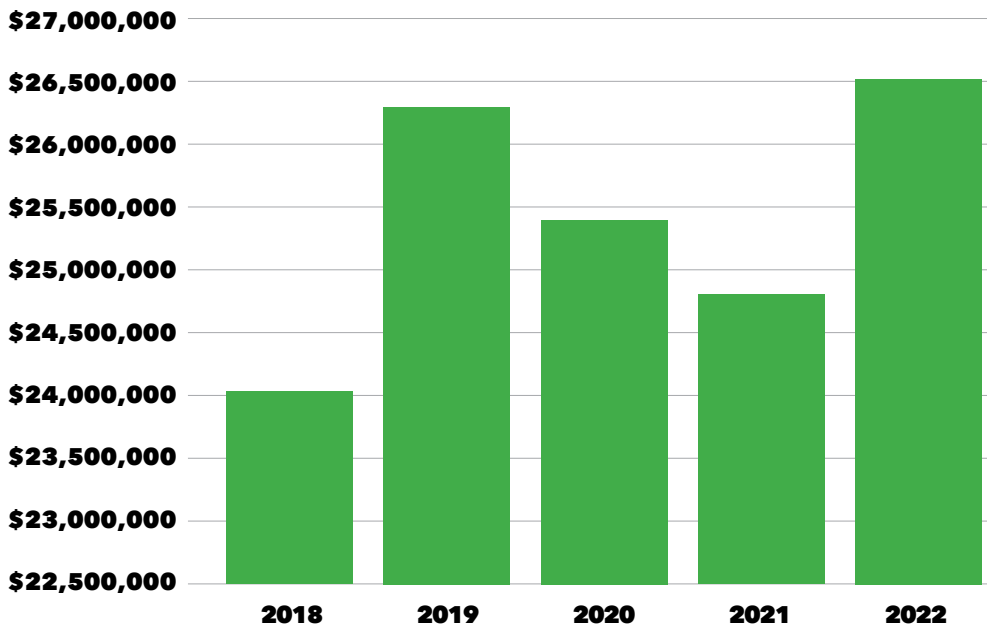
CASE STUDY: EPA TO ARMS

The Office of Personnel Management withheld 259 EPA employee names from public reporting. These employees are listed under the occupations "Criminal Investigation" (217), "General Inspection" (21), "General Investigation" (14), "Intelligence" (4), and "Nuclear Engineering" (3). Collectively these staffers earned \$31,652,744 in total compensation last year. 217 earned over \$100,000 in total compensation, and one earned over \$200,000.

NUMBER OF EMPLOYEES WITH "CRIMINAL INVESTIGATION" TITLE



COLLECTIVE SALARY OF EMPLOYEES WITH "CRIMINAL INVESTIGATION" TITLE



The EPA’s **Criminal Enforcement Program** was [established](#) in 1982 and granted full law enforcement authority by Congress in 1988, during the Reagan administration. According to the EPA [website](#), Criminal Enforcement agents “investigate the most significant and egregious violations of environmental laws which pose significant threats to human health and the environment.”

The agency’s many goals for the Criminal Enforcement Program are outlined in its [FY 2024 Congressional Justification](#), prioritizing “communities with [environmental justice] concerns, the HFC (Hydrofluorocarbons) Enforcement Task Force, the After Market Defeat Device criminal enforcement initiative, and preventing the illegal importation, sale, and distribution of unregistered pesticides.”

The FY 2023 [appropriations](#) for the Criminal Enforcement Program are \$70.7 million.

The EPA also hosts an Office of Homeland Security, created in 2003 in response to 9/11 to address “homeland security-related incidents, such as threats to water and wastewater treatment facilities.”

The office’s mandate has expanded considerably since then, according to the FY 2024 Congressional Justification:

“There has been an evolution of the term and mission of national and homeland security since 9/11. National security is now widely understood to include non-military dimensions, such as climate and environmental security, economic security, energy security, and cybersecurity, as well as traditional homeland security topics. Due to this, the homeland security roles and responsibilities of the EPA have expanded, and several areas (e.g., climate, natural disasters) now involve engagement from the broader national security community. Systematic preparation is essential for the threats that pose the greatest risk to the security of the Nation, including acts of terrorism, climate change, pandemics, catastrophic natural disasters, cyber-attacks, and other national security emergencies.”

EPA budgeted \$89,993,000 for Homeland Security activities for FY 2023.

SCIENCE AND TECHNOLOGY:

Critical Infrastructure Protection: \$10,852,000
 Preparedness, Response, and Recovery: \$25,347,000
 Protection of EPA Personnel and Infrastructure: \$625,000
Total: \$36,824,000

ENVIRONMENTAL PROGRAMS AND MANAGEMENT:

Communication and Information: \$4,692,000
 Critical Infrastructure Protection: \$923,000
 Protection of EPA Personnel and Infrastructure: \$5,188,000
Total: \$10,803,000

BUILDINGS AND FACILITIES:

Protection of EPA Personnel and Infrastructure: \$6,676,000
Total: \$6,676,000

HAZARDOUS SUBSTANCE SUPERFUND:

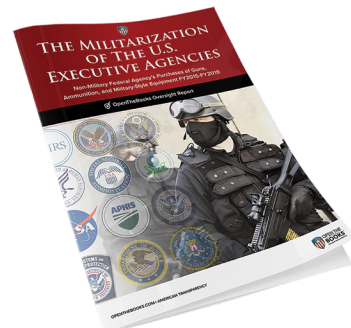
Preparedness, Response, and Recovery: \$34,661,000
 Protection of EPA Personnel and Infrastructure: \$1,029,000
Total: \$35,690,000



Millions Spent on Arming EPA

Crime might not pay, but equipping a team to investigate environmental crimes costs a pretty penny. Disclosed EPA spending shows the agency is stocking up on ammunition, guns, night vision devices, airborne radar, “tactical sets,” and personal armor.

As highlighted in the OpenTheBooks [Militarization of the U.S. Executive Agencies](#) report, like many federal agencies, the EPA has its own law enforcement division. Between 2018-2022 EPA spent \$618,602 on items categorized as “Small Arms” or “Small Arms Ammunition.”



Here is a sample of EPA checkbook spending in detail from 2018-2022:

- \$389,502 for “ammunition” of various sizes
- \$105,208 was spent on “armor, personal”
- \$34,023 went to “optical sighting and ranging equipment”
- \$26,273 was spent on “specialized ammunition handling and servicing equipment”
- \$26,726 went to “night vision equipment”
- \$124,676 on “security vehicle” transportation
- \$70,201 on “tactical sets, kits, and outfits”

CASE STUDY: LAWYERS

If the EPA legal team were a private law firm, then it would currently rank as the 34th largest law firm in America with 1,022 “general attorneys” (and one “patent attorney”) in FY 2022.

Last year this crew collectively received \$157,267,047 in compensation. 960 of the attorneys make over \$100,000, and 18 make over \$200,000. FY 2022 has seen the highest total compensation for the general attorney workforce, swelling from 989 staffers and \$146 million compensation in FY 2018.

And despite the big bucks spent on in-house lawyers, from 2018-2022 EPA also spent \$592,430 on legal professional support contracts, and \$38,555,401 on “environmental consulting and legal support.”

EPA’s ever-expanding regulatory mandates mean there are plenty of opportunities for individuals and organizations to bring litigation against the agency—either for being too strict or not strict enough.

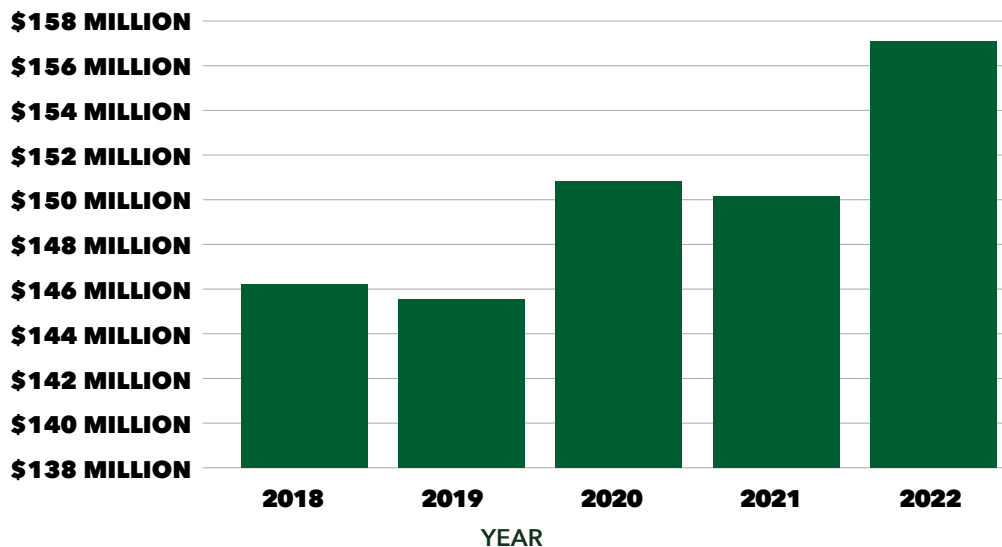
One example: In February 2023, 24 states filed a [federal lawsuit](#) against the Biden administration, naming the EPA and three other federal agencies as defendants over the “Waters of the United States” (WOTUS) rule, rolled out in December 2022.

WOTUS expanded the scope of the federal government’s regulatory power over lakes, wetlands, ponds, streams, and other waterways via the Clean Water Act. The new WOTUS rule would expand EPA jurisdiction to [any](#) body of water—not just open, flowing “streams oceans, rivers, and lakes.”

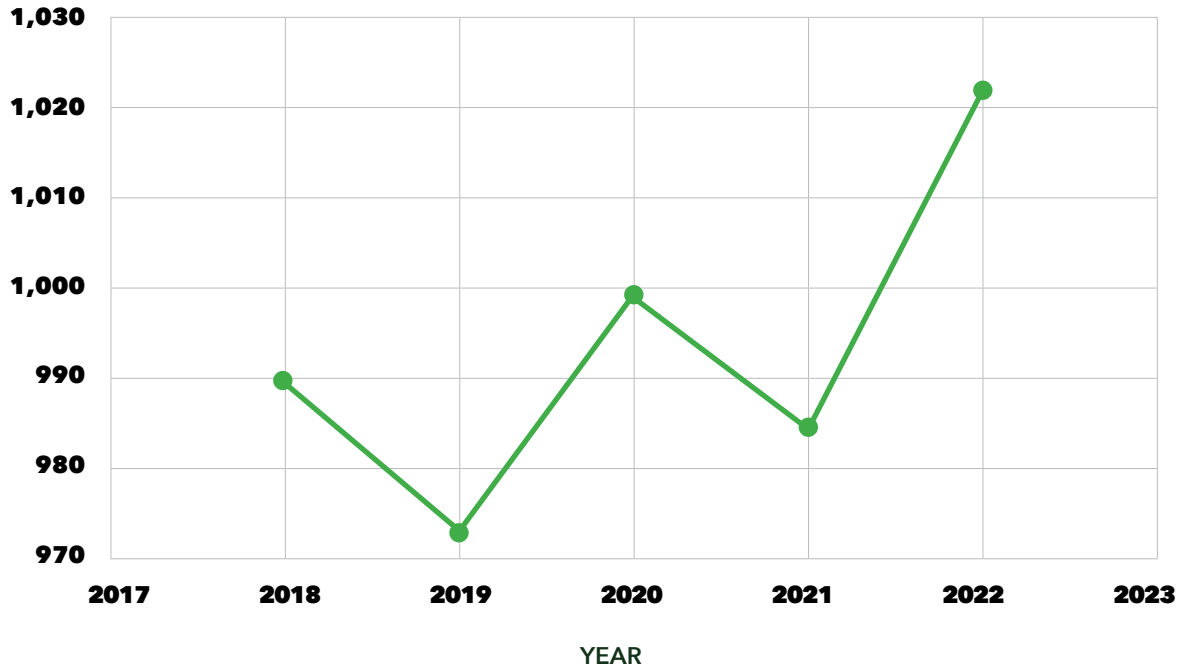
While critics [claim](#) WOTUS is an example of government overreach infringing on the rights of private property owners, the White House [says](#) the rule provides “clear rules of the road that will help advance infrastructure projects, economic investments, and agricultural activities – all while protecting water quality and public health.”

On May 25, 2023, the Supreme Court ruled against the EPA in Sackett vs. EPA, [stating](#) that WOTUS covered wetlands that share a “continuous surface water connection” with relatively permanent bodies of water. The EPA has until September 1 to rewrite the rule so that it is in line with the Supreme Court decision.

TOTAL COMPENSATION FOR ALL GENERAL ATTORNEYS AT EPA



TOTAL NUMBER OF GENERAL ATTORNEYS



YEAR	COUNT OF GENERAL ATTORNEYS	SUM OF TOTAL COMPENSATION
2018	989	\$146,223,405
2019	973	\$145,536,826
2020	999	\$150,877,695
2021	984	\$150,092,401
2022	1,022	\$157,102,945

Total compensation and numbers of General Attorneys on the EPA payroll, not adjusted for inflation. "Total number of GAs" is the number of staff who received a paycheck, which is not the same as full-time equivalent measurements, explained in an earlier section.

Return of "Sue and Settle:"

EPA lawyers don't defend the agency in court—that's the responsibility of the Department of Justice. EPA lawyers can help their DoJ colleagues, but do not track their hours by case.

OpenTheBooks.com's first audit of the EPA covered years [2000-2014](#), and identified issues with a practice known as "Sue and Settle." This term [describes](#) cases wherein a party (often an environmental nonprofit) sues a federal agency, and instead of litigating the lawsuit in court, both parties come to terms via negotiation. Such settlements—or "consent decrees"—may include issuing or determining aspects of a rule or meeting a specific deadline. Critics say the practice creates new regulations without a public policy debate and increases federal influence over state laws.

Sue and Settle cases more than doubled from the W. Bush to Obama administrations. According to the U.S. Chamber of Commerce [research](#), the second Obama term saw the EPA entering 77 consent decrees regarding the Clean Air Act (CAA), compared to 28 during the second term of George W. Bush.

In October 2017 then-EPA Administrator Scott Pruitt published a [directive](#) intended to end the use of "consent decrees and settlement agreements to resolve lawsuits filed against the Agency by special interest groups where doing so would circumvent the regulatory process set forth by Congress."

In his directive, Pruitt outlined the following new procedures to address Sue and Settle:

- Publishing any notices of intent to sue the Agency within 15 days of receiving the notice;
- Publishing any complaints or petitions for review in regard to an environmental law, regulation, or rule in which the Agency is a defendant or respondent in federal court within 15 days of receipt;
- Reaching out to and including any states and/or regulated entities affected by potential settlements or consent decrees;
- Publishing a list of consent decrees and settlement agreements that govern Agency actions within 30 days, along with any attorney fees paid, and updating it within 15 days of any new consent decree or settlement agreement;
- Expressly forbidding the practice of entering into any consent decrees that exceed the authority of the courts;
- Excluding attorney's fees and litigation costs when settling with those suing the Agency;
- Providing sufficient time to issue or modify proposed and final rules, take and consider public comment; and
- Publishing any proposed or modified consent decrees and settlements for 30-day public comment, and providing a public hearing on a proposed consent decree or settlement when requested.

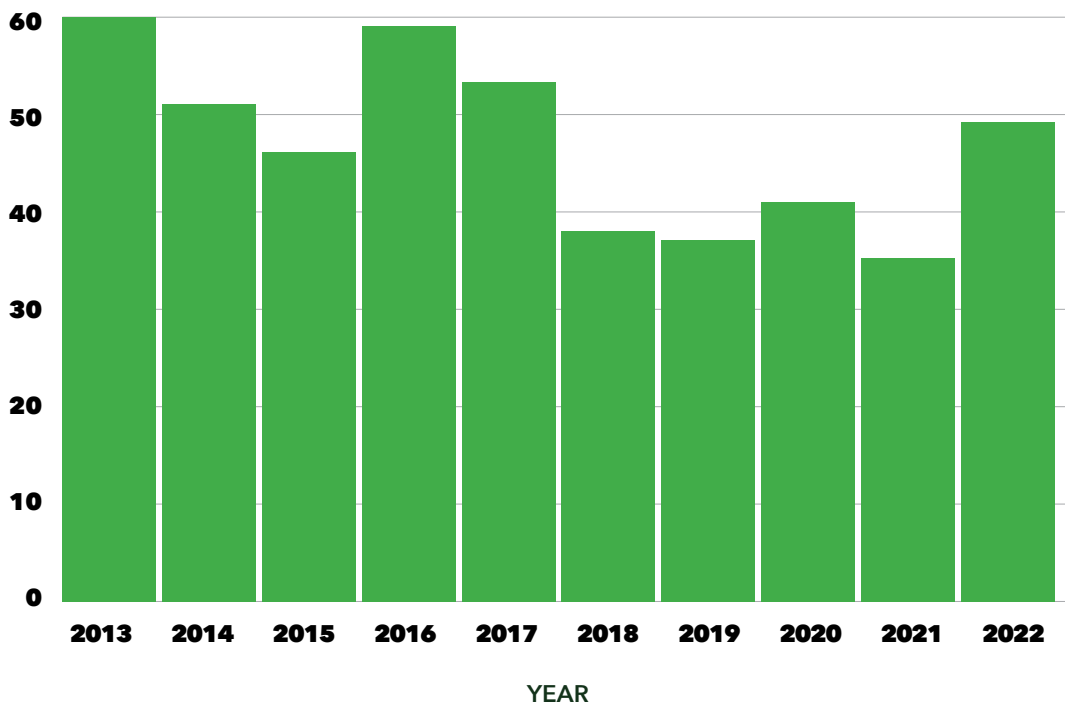


In March 2022, however, Biden EPA Administrator Michael Regan issued a memorandum revoking Pruitt's 2017 directive, although [kept](#) some Trump-era practices related to public access, like posting settlements and consent decrees online for public comment.

In his [memo](#), Regan claimed that Pruitt's "memorandum and directive gave little weight to the well-understood value of settlements in appropriate cases" and noted that safeguards were in place to discourage "consent decrees or settlements that convert a discretionary duty into a mandatory one in the context of regulatory action, and requires associate or deputy attorney general approval for any such agreement."

Before an outside organization can sue the EPA in pursuit of a consent decree or settlement, they must file a "Notice of Intent to Sue." Such notices are available online, and a decrease in the number of consent decrease is observable in the years after the Pruitt memo and before the Regan memo.

NUMBER OF NOTICES OF INTENT TO SUE



EPA TOP SALARIES FY 2022

The top fourteen salaries are displayed below for the latest fiscal year available at OpenTheBooks.com. These salaries represent only “pensionable” salary – the annual amount that figures into the eventual calculation of the employee’s retirement annuity. These figures are not total cost, which includes perks and other benefits.

Most of these employees are based in Durham, North Carolina, where EPA has a staff of over 2,000 on a Research Triangle campus. All of them are [schedule 42](#) employees, meaning they are on a separate payment scheme reserved for scientists and other “special consultants.”

After the top-paid fourteen, the next 102 employees have the same compensation: \$203,700. More than half—67—of these top earners have the title “Program Manager.”

NAME	OCCUPATION	LOCATION	ADJUSTED BASIC PAY
RICHARD S. JUDSON	CHEMISTRY	DURHAM, NC	\$250,000
ANTONY J. WILLIAMS	CHEMISTRY	DURHAM, NC	\$250,000
WAYNE E. CASCIO	GENERAL HEALTH SCIENCE	DURHAM, NC	\$250,000
RUSSELL S THOMAS	TOXICOLOGY	DURHAM, NC	\$250,000
KRISTINA A. CHIALTON	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	DURHAM, NC	\$250,000
THOMAS B. KNUDSEN	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	DURHAM, NC	\$250,000
DAVID DIAZSANCHEZ	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	DURHAM, NC	\$247,399
ANNETTE GUISEPPI-ELIE	GENERAL PHYSICAL SCIENCE	DURHAM, NC	\$245,986
SUZANNE VAN DRUNICK	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	WASHINGTON, D.C.	\$239,353
JAY L. GARLAND	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	CINCINNATI, OH	\$226,350
AMAR V. SINGH	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	DURHAM, NC	\$224,929
GRACE Y. PATLEWICZ	CHEMISTRY	DURHAM, NC	\$211,937
IMRAN A SHAH	PHYSICS	DURHAM, NC	\$209,698
TIMOTHY I. BUCKLEY	GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	DURHAM, NC	\$208,503

TOP 35 JOB TYPES BY COMPENSATION TOTALS

JOB TITLE	NUMBER OF EMPLOYEES	COLLECTIVE ADJUSTED COMPENSATION
GENERAL PHYSICAL SCIENCE	2,237	\$271,550,861
ENVIRONMENTAL PROTECTION SPECIALIST	1,567	\$200,049,671
GENERAL NATURAL RESOURCES MANAGEMENT AND BIOLOGICAL SCIENCES	1,772	\$198,203,748
ENVIRONMENTAL ENGINEERING	1,453	\$184,388,418
MANAGEMENT AND PROGRAM ANALYSIS	1,295	\$165,807,500
GENERAL ATTORNEY	1,022	\$157,102,945
INFORMATION TECHNOLOGY MANAGEMENT	672	\$86,162,613
MISCELLANEOUS ADMINISTRATION AND PROGRAM	468	\$59,209,476
CHEMISTRY	441	\$52,872,322
PROGRAM MANAGEMENT	263	\$49,995,155
CONTRACTING	278	\$32,733,302
PUBLIC AFFAIRS	222	\$27,273,457
CRIMINAL INVESTIGATION	217	\$26,535,145
HUMAN RESOURCES MANAGEMENT	238	\$25,491,515
TOXICOLOGY	176	\$21,804,740
ECONOMIST	131	\$17,351,076
BUDGET ANALYSIS	150	\$17,310,310
GRANTS MANAGEMENT	152	\$16,272,546
FINANCIAL ADMINISTRATION AND PROGRAM	145	\$16,042,753
AUDITING	124	\$15,948,707
ACCOUNTING	137	\$15,846,228
GENERAL ENGINEERING	129	\$15,396,550
GENERAL HEALTH SCIENCE	129	\$15,170,601
ECOLOGY	96	\$12,233,179
SOCIAL SCIENCE	109	\$12,071,455
CHEMICAL ENGINEERING	79	\$10,024,181
GOVERNMENT INFORMATION SPECIALIST	83	\$8,977,163
GENERAL BUSINESS AND INDUSTRY	70	\$8,973,376
MECHANICAL ENGINEERING	61	\$8,616,392
MICROBIOLOGY	56	\$6,856,428
ADMINISTRATIVE OFFICER	65	\$5,435,314
SECRETARY	74	\$5,004,154
GEOLOGY	42	\$4,919,629
FINANCIAL ANALYSIS	41	\$4,913,096
SECURITY ADMINISTRATION	42	\$4,514,205

TOP 35 JOB TYPES BY AVERAGE COMPENSATION		
JOB TITLE	COUNT	AVERAGE OF ADJUSTED BASIC PAY
PROGRAM MANAGEMENT	263	\$190,821
EQUAL OPPORTUNITY COMPLIANCE	2	\$172,991
PLANT PHYSIOLOGY	1	\$168,441
PATENT ATTORNEY	1	\$164,102
INTERNATIONAL RELATIONS	1	\$163,333
FINANCIAL MANAGEMENT	10	\$162,060
REALTY	1	\$159,894
MEDICAL OFFICER	6	\$156,016
INTELLIGENCE	4	\$154,811
GENETICS	1	\$154,733
GENERAL ATTORNEY	1,022	\$153,721
FIRE PROTECTION ENGINEERING	2	\$145,243
COMPUTER ENGINEERING	6	\$143,294
CARTOGRAPHY	1	\$142,976
OPERATIONS RESEARCH	2	\$142,237
MECHANICAL ENGINEERING	61	\$141,252
PSYCHOLOGY	3	\$141,129
INDUSTRIAL PROPERTY MANAGEMENT	1	\$138,856
SOIL SCIENCE	4	\$137,918
EQUAL EMPLOYMENT OPPORTUNITY	29	\$137,506
TELECOMMUNICATIONS	5	\$136,834
TECHNICAL WRITING AND EDITING	2	\$135,324
HEALTH PHYSICS	24	\$135,296
CIVIL ENGINEERING	3	\$134,799
WILDLIFE BIOLOGY	2	\$133,528
ECOLOGY	96	\$132,969
OCEANOGRAPHY	3	\$132,460
ECONOMIST	131	\$132,451
CHEMICAL ENGINEERING	79	\$131,897
EMERGENCY MANAGEMENT SPECIALIST	6	\$131,131
PHYSICS	6	\$130,670
TOXICOLOGY	176	\$130,567
FISH BIOLOGY	6	\$129,102
ENVIRONMENTAL PROTECTION SPECIALIST	1,567	\$128,649
AUDITING	124	\$128,619

THE FEDERAL EMPLOYEE PAYMENT SYSTEM

Most employees of the federal government are subject to a “base” pay, which depends on their “grade” in the “general schedule” system (GS). Grades range from 1-15, with 10 “steps” for each grade. Higher grades and step numbers mean higher salaries.

Federal GS employees also receive a basic pay adjustment depending on their location. According to the General Schedule website:

“There are currently 47 [locality pay areas](#), which cover the lower 48 States and Washington, DC, plus Alaska, Hawaii, and the U.S. territories and possessions. Forty-four of the locality pay areas cover large metropolitan areas (e.g., Los Angeles, New York, Washington, DC), two cover entire States—Alaska and Hawaii, and the remainder of the United States and its territories and possessions are included in the catch-all Rest of U.S. (RUS) locality pay area.”

In other words, every federal GS employee working inside the borders of the United States receives a locality pay adjustment on top of their base salary. Basic pay and locality pay adjustments are generally increased yearly based on inflation and other cost-of-living factors.

For FY 2023 basic pay increases for GS employees were 4.1%, but with all locality pay, raises [range](#) between 4.35% and 5.15%.

For example, in FY 2023 the [basic pay](#) for a GS 13 step 1 employee is \$71,099. With locality pay [adjustment](#), that number becomes \$121,873 in San Francisco; \$112,015 in Washington, D.C.; \$102,613 in Durham, North Carolina; \$99,916 in Kansas City, Missouri; and \$98,496 in the “Rest of the U.S.” category.

Breakdown of EPA staff grades in FY 2022:

- **Grade 15:** 2,047 employees
- **Grade 14:** 2,680 employees
- **Grade 13:** 5,572 employees
- **Grade 12:** 2,014 employees
- **Grade 11:** 817 employees
- **Grade 10:** 35 employees
- **Grade 09:** 613 employees
- **Grade 08:** 56 employees
- **Grade 07:** 306 employees
- **Grade 06:** 11 employees
- **Grade 05:** 50 employees
- **Grade 04:** 73 employees
- **Grade 03:** 7 employees
- **Grade 02:** 2 employees

As mentioned in a previous section, the highest-paid EPA staffers are not on the GS schedule, but rather are schedule 42 employees, which generally means have a scientific background that are therefore entitled to higher compensation.

In FY 2022 EPA had 40 such employees, with salaries ranging from \$94,373 to six employees taking home \$250,000. In total, schedule 42 employee salaries cost the agency \$6,882,874 last year.

TOTAL GS EMPLOYEES: 14,283
TOTAL NON-GS EMPLOYEES: 849
GRAND TOTAL: 15,132

CASE STUDY: LOCATION, LOCATION, LOCATION

WASHINGTON, D.C.

- Washington, D.C. has the highest number of EPA employees, at 4,203, or a little less than one-third of the agency's 15,132 staffers reported on payroll in FY 2022.
- Collectively D.C. staffers received \$574,646,262 in pay in FY 2022.
- Staffers in D.C. number more than twice that of North Carolina, the state with the next highest number of EPA staffers: 1,393 collecting \$166,052,570 in compensation in 2022.

TOP 10 HIGHEST NUMBER OF EMPLOYEES BY STATE (INCLUDING WASHINGTON, D.C.)

STATE	SUM OF BASIC PAY	SUM OF ADJUSTED BASIC PAY	COUNT OF NAME	DIFFERENCE BETWEEN BASIC & ADJUSTED PAY
DISTRICT OF COLUMBIA	\$450,843,916	\$574,646,267	4,203	\$123,802,351
NORTH CAROLINA	\$138,696,056	\$166,052,570	1,393	\$27,356,514
ILLINOIS	\$89,593,671	\$114,657,801	977	\$25,064,130
GEORGIA	\$84,701,537	\$103,334,837	903	\$18,633,300
CALIFORNIA	\$73,770,306	\$101,503,964	788	\$27,733,658
TEXAS	\$68,305,824	\$85,070,537	744	\$16,764,713
PENNSYLVANIA	\$63,933,800	\$80,554,404	680	\$16,620,604
NEW YORK	\$60,044,408	\$78,660,515	628	\$18,616,107
COLORADO	\$58,504,144	\$73,857,238	597	\$15,353,094
MASSACHUSETTS	\$51,983,897	\$66,112,307	572	\$14,128,410

During the Trump administration, the president attempted to move federal offices and hundreds of jobs outside of D.C., with a stated goal of reducing costs for both rent and personnel and reducing the concentration of federal dollars spent in the nation's capital.

The EPA was not impacted, but the Department of Agriculture moved two offices from D.C. to Kansas City. The Department of Interior's Bureau of Land Management's headquarters were moved to Grand Junction, Colorado, and then moved back to D.C. by the Biden administration in 2021.

Contracts And Grants

EPA contract spending is correlated with staff concentration, likely because many contracts are meant to assist headquarters operations.

From 2018-2022 EPA spent \$6,406,870,569.56 in contracts, \$1,699,279,649 of which had a “primary place of performance” in D.C., Virginia, or Maryland—about 26%.

TOP 10 STATES AND THE DISTRICT OF COLUMBIA FOR EPA GRANT SPENDING	
STATE	SUM OF FEDERAL ACTION OBLIGATION
VIRGINIA	\$855,791,805
DISTRICT OF COLUMBIA	\$647,943,373
NORTH CAROLINA	\$466,063,480
MASSACHUSETTS	\$396,747,801
CALIFORNIA	\$396,114,458
TEXAS	\$253,708,516
PENNSYLVANIA	\$243,792,234
ILLINOIS	\$217,988,110
OHIO	\$201,948,801
MARYLAND	\$195,544,471

Grants, on the other hand, are more geographically dispersed, with California and New York receiving the highest dollar amounts of the \$26,459,600,452 in grants spent between 2018-2022.

D.C., with a population of about 700,000 in 2020 and occupying an area of 68.35 square miles, still punched above its weight in terms of grant spending. The city was the number 27 grant recipient in this time frame, getting over \$371.223 million in grants—more than West Virginia, Louisiana, Idaho, Hawaii, and over two dozen other states and territories.

TOP TEN STATES AND THE DISTRICT OF COLUMBIA FOR EPA GRANT SPENDING	
STATE	SUM OF FEDERAL ACTION OBLIGATION
CALIFORNIA	\$2,478,060,911
NEW YORK	\$1,587,791,467
MICHIGAN	\$1,048,312,986
TEXAS	\$1,036,351,439
PENNSYLVANIA	\$981,880,313
ILLINOIS	\$926,761,529
FLORIDA	\$920,249,453
OHIO	\$879,663,952
MASSACHUSETTS	\$808,051,646
NEW JERSEY	\$724,016,240

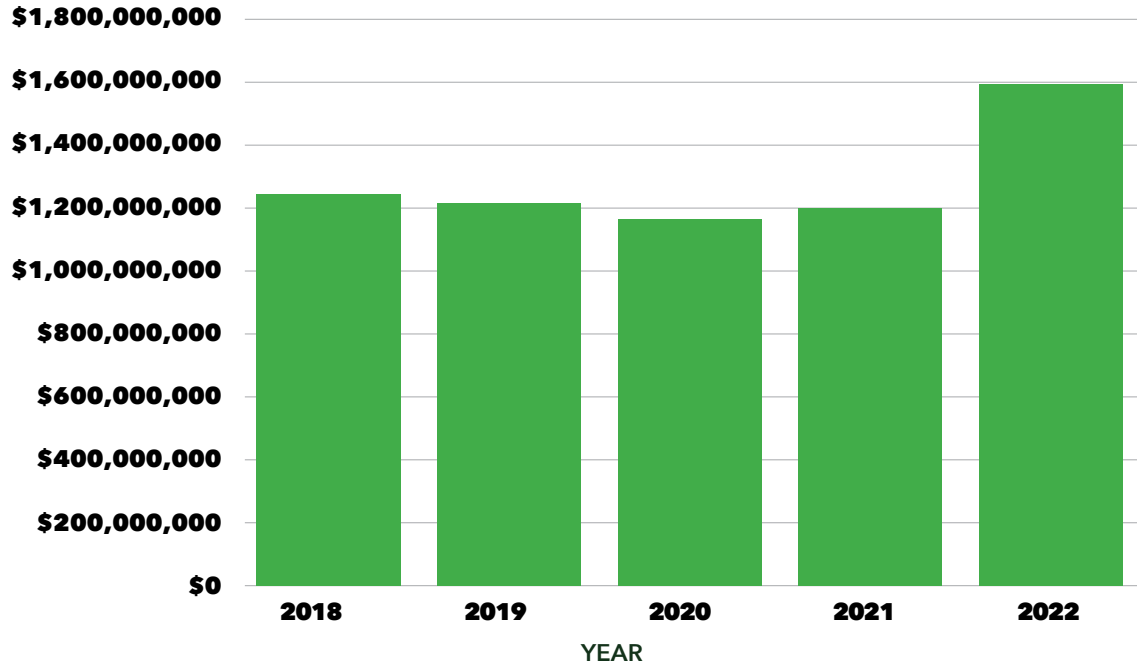


CONTRACTS

From FY 2018-2022 the EPA has engaged in 66,109 contracting transactions amounting to \$6,406,870,570, averaging about \$1.3 billion a year.

EPA contract spending decreased during the Trump administration and jumped about \$400 million in the first fiscal year of the Biden administration.

AMOUNT OF DOLLARS SPENT ON CONTRACTS



The EPA contracted with 2,706 companies since 2018.

Procurements ranged from “environmental remediation” (\$1.4 billion), to “laboratory equipment and supplies” (\$81.4 million), to “newspapers and periodicals” (\$2.09 million), to “environmental assessments” (\$151 million). The EPA discloses spending of \$1.26 million for “passenger motor vehicles,” and \$32,780 for “laundry/dry cleaning.”

HIGHLIGHTS

- The top five companies receiving contracts from EPA were collectively paid \$1.558 billion, about 23% of all contract spending from 2018-2022. The top 50 contract recipients out of 2,706 have received \$4.33 billion from 2018-2022, about 67% of all contract spending.
- In 2022 EPA had to pay \$63 million in restitution for the 2015 Colorado Gold King spill, an environmental remediation project-turned environmental disaster. Number one contract spending recipient Environmental Restoration was the primary contractor remediating the site when the accident occurred.
- \$1.89 billion was spent on various professional services support, including \$283 million in program management support, over \$10 million for human resources, and over \$6 million for public affairs activities.
- EPA spent \$15.2 million on furniture over the past five years—buying, repairing, installing, moving, and renting.

CASE STUDY: TOP EPA CONTRACTORS FROM 2018-2022

These are the top five aforementioned companies receiving contracts from EPA, and their contract specialties:

- 1. Environmental Restoration LLC (\$464.65 million):** All contracts were related to environmental remediation or conservation activities.
- 2. EA Engineering, Science, and Technology Inc (\$321,385,612):** Contracts mostly related to architecture, engineering, and environmental assessments.
- 3. Tetra Tech, Inc (\$269.4 million):** Contracts cover a wide range of activities from product engineering to vocational training to telecom management to environmental assessment.
- 4. Jacobs Engineering Group Inc (\$255.96 million):** Contracts cover architecture and engineering, inspection, research and development, IT management, and professional support.
- 5. Eastern Research Group (\$247.26 million):** Contracts are primarily concentrated in architecture and engineering, research and development, scientific studies, and professional support.

The top 50 contract recipients out of 2,706 have received \$4.33 billion from 2018-2022, about 67% of all contract spending.

TOP 50 EPA CONTRACTORS 2018-2022

LOCAL GOVERNMENT	SUM OF FEDERAL ACTION OBLIGATION
ENVIRONMENTAL RESTORATION LLC	\$464,656,640
EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC., PBC	\$321,385,613
TETRA TECH, INC.	\$269,408,541
JACOBS ENGINEERING GROUP, INC.	\$255,969,696
EASTERN RESEARCH GROUP, INC.	\$247,265,268
IF INTERNATIONAL, INC.	\$183,620,376
WESTON SOLUTIONS HOLDINGS, INC.	\$175,755,451
GENERAL DYNAMICS CORP.	\$164,236,906
CDM SMITH, INC.	\$135,882,736
ARCTIC SLOPE MISSION SERVICES LLC	\$128,111,658
KEMRON ENVIRONMENTAL SERVICES, INC.	\$125,542,400
BOOZ ALLEN HAMILTON HOLDING CORPORATION	\$115,412,423
EQM TECHNOLOGIES & ENERGY, INC.	\$105,038,826
RESEARCH TRIANGLE INSTITUTE	\$96,391,341
C MC, INC.	\$85,398,522
J. F. BRENNAN COMPANY, INC.	\$78,846,701
HYDROGEOLOGIC, INC.	\$69,048,590
APTIM HOLDINGS, LLC	\$67,337,462
CGI, INC.	\$60,367,445
JOHN WOOD GROUP PLC	\$58,803,089
OAK RIDGE ASSOCIATED UNIVERSITIES, INC.	\$58,210,805
THE CADMUS GROUP, LLC	\$55,767,960
CHENEGA IT ENTERPRISE SERVICES, LLC	\$54,666,999
ARCTIC SLOPE REGIONAL CORP.	\$53,621,449
AECOM	\$52,224,469
SKEO SOLUTIONS, INC.	\$45,636,190
GUARDIAN ENVIRONMENTAL SERVICES CO., INC.	\$44,586,459
ABT ASSOCIATES, INC.	\$43,543,534
DELL TECHNOLOGIES, INC.	\$41,825,197
HDR, INC.	\$41,718,412
BATTELLE MEMORIAL INSTITUTE	\$40,212,440

TOP 50 EPA CONTRACTORS 2018-2022, CONT.	
LOCAL GOVERNMENT	SUM OF FEDERAL ACTION OBLIGATION
SRC, INC.	\$37,623,660
MAXIMUS FEDERAL CONSULTING, LLC	\$37,014,077
BVH, INC.	\$36,431,338
KEMRON/ARROWHEAD JV, LLC	\$34,351,951
LOCKHEED MARTIN CORP.	\$33,691,737
SCIENCE APPLICATIONS INTERNATIONAL CORP.	\$33,070,972
NOBIS ENGINEERING, INC.	\$31,752,788
AND M ENGINEERING & ENVIRONMENTAL SERVICES, INC.	\$31,413,001
GREAT LAKES ENVIRONMENTAL CENTER, INC.	\$31,269,636
PEGASUS TECHNICAL SERVICES, INC.	\$30,513,361
TOEROEK ASSOCIATES, INC.	\$30,289,431
AHTNA ENVIRONMENTAL, INC.	\$29,975,889
MCP COMPUTER PRODUCTS, INC.	\$29,333,454
VETERANS WORLDWIDE SALES & SERVICES, LLC	\$28,616,636
AMEC, PLC	\$28,317,962
CSRA, LLC	\$28,043,972
LEIDOS HOLDINGS, INC.	\$27,719,605
SKINNER DEVELOPMENT, INC.	\$26,389,432
CONSOLIDATED SAFETY SERVICES INC.	\$25,591,178

CASE STUDY: THE COLORADO GOLD KING SPILL

In 2015 at the Colorado Gold King Mine, 3 million gallons of toxic wastewater laced with 880,000lbs of hard metals was inadvertently released into a creek feeding into the Animas River - a tributary of the Colorado River.

A primary EPA on-site contractor during the spill was Environmental Restoration LLC (ER). Today ER is the number one EPA contractor, but ER was the EPA’s eighth largest contractor at the time, receiving about \$426 million in work from 2000-2014.

In 2020 EPA [settled](#) with the state of Utah for its role in the spill, agreeing to fund \$220 million in abandoned mine remediation and water projects in the state.

In a separate [lawsuit](#) in 2022 the EPA agree to pay \$63 million to the state of New Mexico and the Navajo Nation for damage caused by the spill. ER paid an additional \$2.5 million to the state of New Mexico, along with another Gold King Mine contractor, Western Solutions Inc.

CASE STUDY: CONTRACT CATEGORIES

The highest-funded spending category is by far environmental remediation at over \$1.4 billion from 2018-2022—an intuitive category for the top spot given the agency’s focus on Superfund, Brownfield, and other toxic site cleanup.

Other big categories of spending from that time frame include:

- Management engineering: \$213,106,857
- Landscaping, interior layout, and designing: \$172,394,352
- Environmental assessments: \$151,728,276
- Regulatory analyses and studies: \$92,933,169
- IT software: \$80,852,933
- Facilities operation support: \$76,060,166



HISTORY LESSON: 1980, EPA SPENT \$1M TO PRESERVE SEWER AS HISTORICAL MONUMENT

First published in RealClearPolicy:

Cleaning up toxic environmental sites is arguably EPA’s most important job, but at one point the agency was interested in preserving the remnants of where sludge once was.

In 1980, the Environmental Protection Agency wasted between \$1 million and \$1.2 million – \$3.5 million to \$4.2 million in 2022 dollars – to preserve an underground sewer as a historical monument. Sen. William Proxmire, a Democrat from Wisconsin, awarded the EPA his [Golden Fleece Award](#) for flushing tax dollars down the drain.

In 1975, the EPA required the City of Trenton, New Jersey to upgrade its sewer system and sanitation plant.

Trenton planned to build the new sewers through part of an existing 100-year-old brick Lambertson Street sewer.

Their historical preservation officer, however, found that it wasn’t usable but still wanted to preserve it. She wrote to the EPA to express her concern that destroying this hidden, underground sewer would constitute a loss of “a symbol and expression of America’s former engineers, engineering, urban life, and planning.”

Given this information, the EPA issued another edict: the City of Trenton now had to preserve the old sewer and build a new sewer parallel to the old.

By requiring the construction of a new sewer next to the old, as well as hiring an archeologist to ensure the old sewer would be properly preserved during construction, the EPA cost the City of Trenton (and taxpayers) an additional \$1 million to \$1.2 million.

The sewer is not on display, is not accessible to the public, and was full of mud and sludge. In fact, it was only viewed twice in 23 years prior to 1980.

Luckily, the City of Trenton added plaques above ground at each end of the sewer to alert pedestrians of its existence, so visitors could enjoy the historic Lambertson Street sewer for years to come.

TOP 20 SPENDING CATEGORIES 2018-2022

STATE	AMOUNT OF DOLLARS SPENT ON CONTRACTS
ENVIRONMENTAL SYSTEMS PROTECTION - ENVIRONMENTAL REMEDIATION	\$1,421,043,309
SUPPORT- PROFESSIONAL: OTHER	\$827,806,550
OTHER ENVIRONMENTAL SERVICES	\$525,732,086
SUPPORT - PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$283,089,135
SUPPORT - PROFESSIONAL: ENGINEERING/TECHNICAL	\$270,201,738
ARCHITECT AND ENGINEERING GENERAL: MANAGEMENT ENGINEERING	\$213,106,858
SUPPORT - PROFESSIONAL: EMERGENCY RESPONSE/ DISASTER PLANNING/PREPAREDNESS SUPPORT	\$198,937,424
ARCHITECT AND ENGINEERING- GENERAL: LANDSCAPING, INTERIOR LAYOUT, AND DESIGNING	\$172,394,352
SPECIAL STUDIES/ANALYSIS - ENVIRONMENTAL ASSESSMENTS	\$151,728,277
IT AND TELECOM - OTHER IT AND TELECOMMUNICATIONS	\$100,723,131
SPECIAL STUDIES/ANALYSIS - REGULATORY	\$92,933,169
CONSTRUCTION OF LABORATORIES AND CLINICS	\$85,195,141
LABORATORY EQUIPMENT AND SUPPLIES	\$81,417,357
INFORMATION TECHNOLOGY SOFTWARE	\$80,852,933
IT AND TELECOM - INTEGRATED HARDWARE/SOFTWARE/ SERVICES SOLUTIONS, PREDOMINANTLY SERVICES	\$76,463,031
HOUSEKEEPING - FACILITIES OPERATIONS SUPPORT	\$76,060,167
ARCHITECT AND ENGINEERING - GENERAL: PRODUCTION ENGINEERING	\$68,723,635
ARCHITECT AND ENGINEERING - GENERAL: OTHER	\$63,898,754
SUPPORT- MANAGEMENT: DATA COLLECTION	\$60,814,070
IT AND TELECOM - FACILITY OPERATION AND MAINTENANCE	\$52,003,166

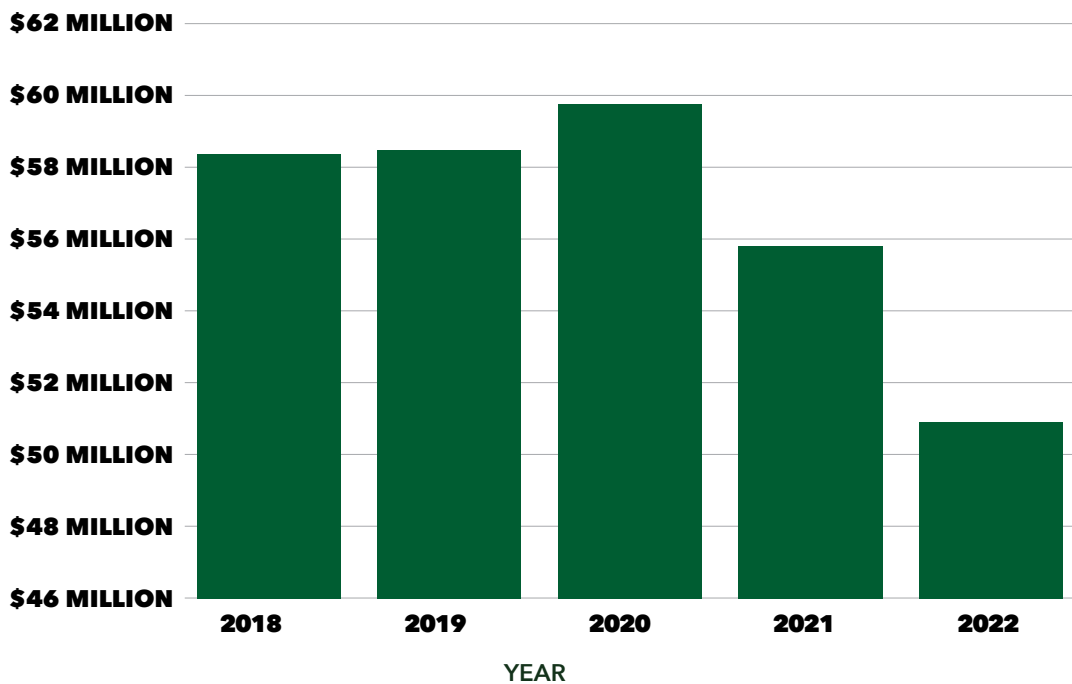
CASE STUDY: PROFESSIONAL AND MANAGEMENT SUPPORT

A huge spending category broken up across subcategories is professional, administrative, and management support, which collectively cost the agency over \$1.89 billion from 2018-2022. This category is meant to provide various forms of support to EPA staffers.

Some notable expenditures include:

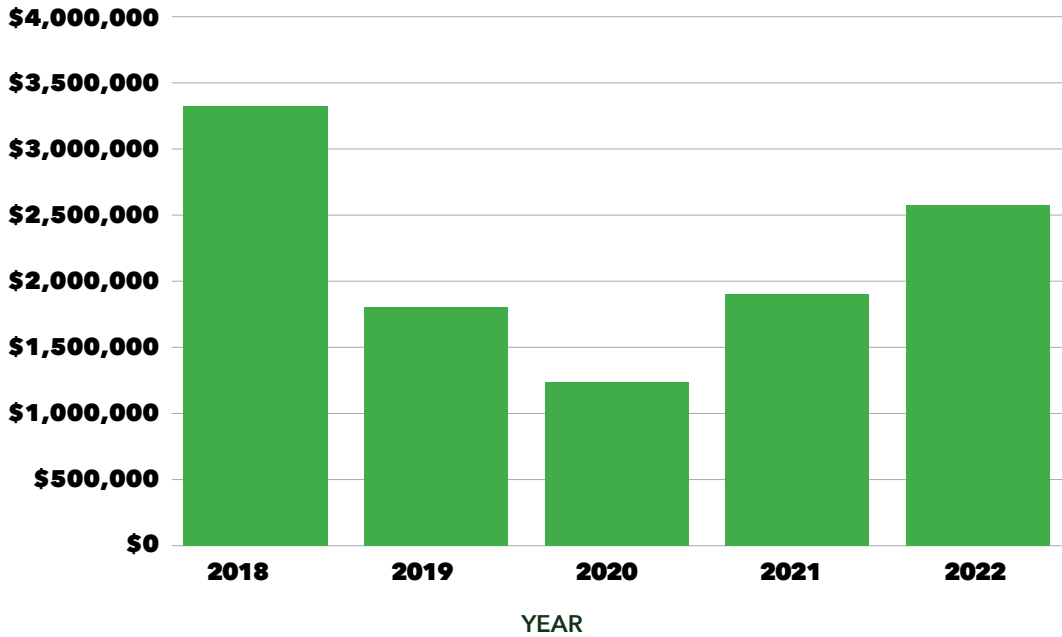
- Program Management (\$283.089 million total).** As highlighted in the EPA Top Salaries FY 2022 section, EPA's 263 program managers in that year commanded the highest average salary of all employee categories, at over \$190,000. Collectively, they were paid \$50.16 million in salary in FY 2022.

TOTAL SPENDING ON PROGRAM MANAGEMENT CONTRACTS



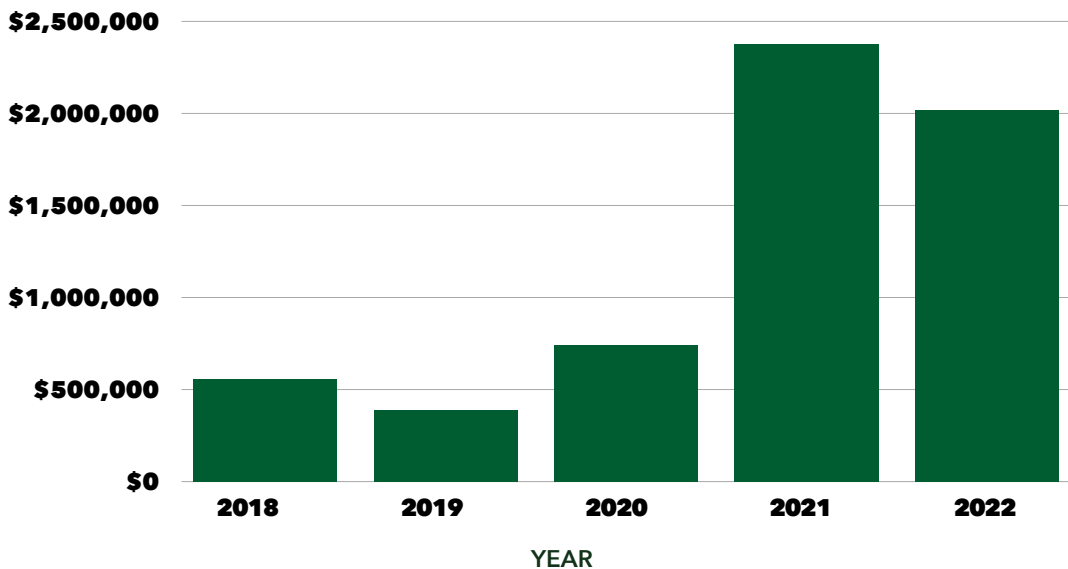
- Human Resources (\$10.85 million total).** In FY 2022 the EPA spent \$2.574 million on HR support, including \$139,999 for "Diversity Consultant and Barrier Analysis Services." In that same year, the agency had 240 human resources personnel on staff, spending \$25.6 million on their collective salaries.

AMOUNT PAID TO HR CONTRACTORS



- **Multiple Categories Concerning Public Opinion, Public Relations, Advertising, And Communications (Collectively \$6.116 Million Total).** \$633,420 of this funding went to support one EPA program—EPA SmartWay, which “helps companies advance supply chain sustainability by measuring, benchmarking, and improving freight transportation efficiency.”
- **The EPA office concerned with these, and other related activities, is the Office of Public Affairs.** In FY 2022 EPA employed 223 public affairs staffers with a collective salary pay of over \$27.273 million.

AMOUNT PAID TO PUBLIC AFFAIRS CONTRACTORS



Other categories of professional support services include:

- Emergency Response/Preparedness (\$198.93 million)
- Physical Security and Badging (\$26.089 million)
- Translation and Interpreting (\$9.6 million)

CONTRACT SPENDING FOR PROFESSIONAL, MANAGEMENT, AND ADMINISTRATIVE SUPPORT ACTIVITIES	
SUPPORT ACTIVITY	SUM OF FEDERAL ACTION OBLIGATION
PROFESSIONAL: OTHER	\$827,806,550
PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$283,089,135
PROFESSIONAL: ENGINEERING/TECHNICAL	\$270,201,738
PROFESSIONAL: EMERGENCY RESPONSE/DISASTER PLANNING/PREPAREDNESS SUPPORT	\$198,937,424
MANAGEMENT: DATA COLLECTION	\$60,814,070
ADMINISTRATIVE: OTHER	\$45,140,074
PROFESSIONAL: OPERATIONS RESEARCH/QUANTITATIVE ANALYSIS	\$37,624,983
PROFESSIONAL: PROGRAM EVALUATION/REVIEW/ DEVELOPMENT	\$27,795,152
PROFESSIONAL: PHYSICAL SECURITY AND BADGING	\$26,089,589
ADMINISTRATIVE: LIBRARY	\$23,097,935
ADMINISTRATIVE: MAILING/DISTRIBUTION	\$16,820,935
PROFESSIONAL: PERSONAL SERVICES CONTRACTS	\$10,991,480
PROFESSIONAL: HUMAN RESOURCES	\$10,849,945
MANAGEMENT: OTHER	\$9,629,314
ADMINISTRATIVE: TRANSLATION AND INTERPRETING	\$8,971,434
ADMINISTRATIVE: INFORMATION RETRIEVAL	\$4,432,317
MANAGEMENT: CONTRACT/PROCUREMENT/ ACQUISITION SUPPORT	\$4,384,337
PROFESSIONAL: VETERINARY/ANIMAL CARE	\$3,037,150
PROFESSIONAL: MARKET RESEARCH/PUBLIC OPINION	\$3,017,634
MANAGEMENT: LOGISTICS SUPPORT	\$2,486,728

CONTRACT SPENDING FOR PROFESSIONAL, MANAGEMENT, AND ADMINISTRATIVE SUPPORT ACTIVITIES, CONT.

SUPPORT ACTIVITY	SUM OF FEDERAL ACTION OBLIGATION
ADMINISTRATIVE: COURIER/MESSENGER	\$2,305,172
PROFESSIONAL: COMMUNICATIONS	\$1,743,907
PROFESSIONAL: LAND SURVEYS-CADASTRAL (NON-CONSTRUCTION)	\$1,710,338
PROFESSIONAL: EXPERT WITNESS	\$1,663,157
MANAGEMENT: ACCOUNTING	\$1,349,494
MANAGEMENT: ADVERTISING	\$1,191,295
MANAGEMENT: FINANCIAL	\$1,150,838
PROFESSIONAL: POLICY REVIEW/DEVELOPMENT	\$1,045,329
PROFESSIONAL: TECHNOLOGY SHARING/UTILIZATION	\$741,678
PROFESSIONAL: LEGAL	\$592,431
ADMINISTRATIVE:- PERSONAL PROPERTY MANAGEMENT	\$445,883
PROFESSIONAL: CERTIFICATIONS AND ACCREDITATIONS (OTHER THAN EDUC OR INFO TECH C&A]	\$284,096
MANAGEMENT: AUDITING	\$263,384
ADMINISTRATIVE: WORD PROCESSING/TYPING	\$197,920
MANAGEMENT: PUBLIC RELATIONS	\$163,710
ADMINISTRATIVE: PAPER SHREDDING	\$101,757
PROFESSIONAL: PATENT AND TRADEMARK	\$66,897
ADMINISTRATIVE: COURT REPORTING	\$24,198
PROFESSIONAL: PERSONAL CARE (NON-MEDICAL)	\$20,752
ADMINISTRATIVE: TRANSCRIPTION	\$2,354
ADMINISTRATIVE: STENOGRAPHIC	(\$847.32)
GRAND TOTAL	\$1,890,281,666

CASE STUDY: SOCIAL SPENDING & DATA ENTRY

EPA data entry can often be inconsistent and therefore difficult to track across spending categories. Names for categories can vary from year to year and office to office. Here are some examples as seen through social spending like awards, award ceremonies, and fitness and recreation centers.

Because of the inconsistency of category labeling for these items, auditors had to search through contract descriptions to find relevant spending. Therefore, this list may not be complete.

Fitness and Recreation (2018-2021): \$56,531 in Identifiable Spending

- \$5,952 at the Durham, North Carolina campus for fitness center maintenance (categorized as "Maint/Repair/Rebuild of Equipment-Recreational and Athletic Equipment")
- \$15,724 for the operation and management of a fitness center for the Philadelphia EPA office (categorized as "Recreational and Gym Equipment.")
- \$10,939 for CCTV monitoring devices for the Philadelphia EPA fitness center (categorized as "Miscellaneous Alarm, Signal, and Security Detection Systems.")
- \$23,916 for wellness/fitness equipment for the Rosemont, Illinois EPA office (categorized as "Recreational and Gym Equipment.")

Awards (2018-2021): \$244,466 in Identifiable Spending

EPA spent nearly a quarter million dollars from FY 2018-2022 on various awards and award ceremonies.

Annual EPA Office of Research and Development (ORD) Awards:

- **2019:** \$20,021 spent on "Acrylic, Bronze Medals, and Certificate Holders" (categorized as "Collectors and/or Historical Items"); \$502 spent on "Crystal, Acrylic, and Glass Plaques" (categorized as "Flags and Pennants.")
- **2020:** \$20,074 on "Awards" (categorized as "Lease/Rental"); \$918 spent on "Acrylic, Bronze Medals, and Certificate Holders" (categorized as "Collectors and/or Historical Items")

National Honors Awards:

- **2019:** \$30,776 spent on a meeting space and AV equipment for the awards ceremony (categorized as "Lease/Rental")
- **2021:** \$844 spent on "23 Silver Medals and 23 Gold Medals" (categorized as "Office Supplies.")

Office of Water Honor Ceremony:

- **2018:** \$6,490 for "Award Trophies for Office of Water 2016 for Honor Ceremony" (categorized as "Flags and Pennants.") It is unclear why a 2016 award ceremony would be logged in 2018.
- **2022:** \$14,483 for "Honor Awards Medals" (categorized as "Office Supplies")

EPA Region 3 Employee Recognition Ceremony :

- **2018:** \$13,420 for "Light Refreshments and Ballroom Rental" (categorized as "Lease/Rental.") and \$5,760 for "Audio Visual" (categorized as "Lease or Rental.")
- **2019:** \$21,960 for "Light Refreshments and Ballroom Rental" (categorized as "Lease/Rental.")
- **2020:** \$6,000 for "Audio/Visual Needs" (categorized as "Lease or Rental.")

Office of Mission Support Awards Ceremony

- **2021:** \$16,622 for “Awards and Engravings” (categorized as “Office Supplies.”)
- **2022:** \$28,118 for “Acrylic Engraved Awards” (categorized as “Office Supplies.”)

Office of Enforcement and Compliance Assurance

- **2022:** \$12,344 for “Bronze Medals” (categorized as “Office Supplies.”); \$12,291 for “Facility Rental for Awards Ceremony” (categorized as “Lease/Rental”).

Other Medals/Recognitions/Ceremonies

- **2018:** \$9,472 for “Awards for the OARM [Office of Administration and Resources Management] Honor Awards Ceremony” (categorized as “Badges and Insignia”)
- **2019:** \$18,539 for “Labeled Plaques” for winners of the Presidential Innovation Award for Environmental Educators and the President’s Environmental Youth Award (categorized as “Signs, Advertising Displays, and Identification Plates.”)
- **2022:** 5,832 for “300 EPA Commendable Service Medals” (categorized as “Office Supplies.”)

EnergyStar Partners: \$138,288

From 2020-2022 EPA contractor ICF Incorporated received \$138,288 for “Support for Annual EnergyStar Partner Recognition.”

According to the EPA [website](#):

“Each year, EPA honors a group of businesses and organizations that have made outstanding contributions to protecting the environment through superior energy efficiency achievements. Builders, developers, Energy Rating Companies, utilities, and sponsors that meet certain criteria are eligible to apply for this prestigious award.”

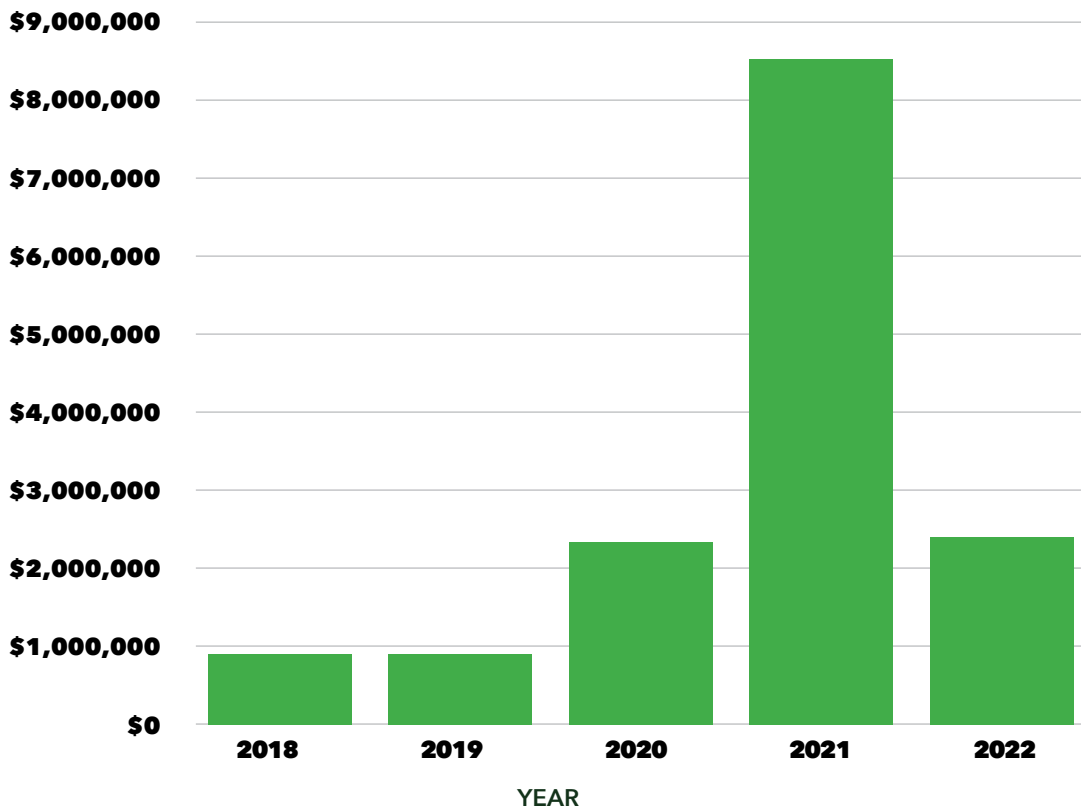


CASE STUDY: FURNITURE

The EPA spent \$15,166,951 on furniture from 2018-2022 in categories that including buying, renting, moving, and repairing agency furniture.

With 15,133 people on payroll in FY 2022, that comes to a little over \$1,000 per employee. High-end office furniture supplier MillerKnoll received nearly half of the funding for these contracts—\$7,579,012. About \$5.5 million of this funding was for a single contract—kitting out new EPA offices in Philadelphia in FY 2021.

TOTAL EPA FURNITURE CONTRACT SPENDING



Not included is \$34,480 worth of spending on “Vehicular Furniture” in 2019 for “Four 2019 Ford F-150 XLT Crew Cab Short Bed 4x4 Trucks.”

OpenTheBooks.com reported on EPA furniture spending between 2005-2014 in our first EPA oversight report, finding the agency had spent \$92.4 million in office furniture, ranging from “fancy hickory chairs and a hexagonal wooden table, worth thousands of dollars each, to a simple drawer to store pencils that cost \$813.57.”



GRANTS

As described in an earlier section of this report, Congress appropriated EPA over \$100 billion taxpayer dollars through the 2021 Infrastructure Investment and Jobs Act and 2022 Inflation Reduction Act.

Some spending from the IIJA is already being reflected in FY 2022 but most of this funding will be discharged in the coming years.

Between 2018 and 2022, the EPA made 29,093 transactions with grantees, worth \$26,459,600,452. On average, this works out to \$5.3 billion per year, or a little more than half of the EPA's annual budget in this time.

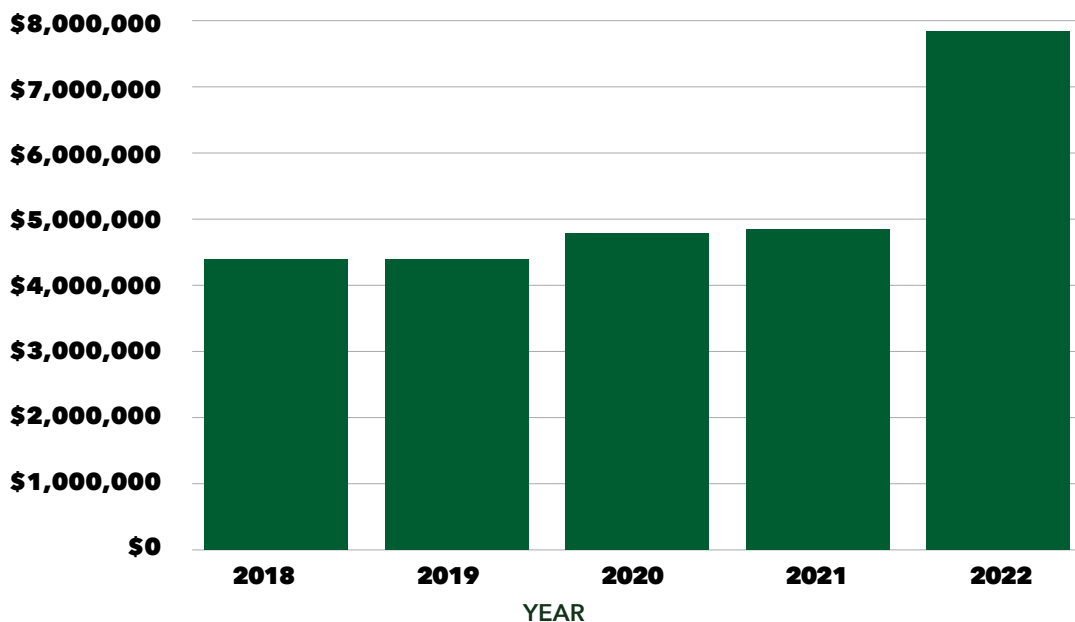
About 89% of this money, over 23.7 billion, was distributed to state or local governments (not including higher education). The remaining 11% (\$2.7 billion) was split:

- 3.7% to 501(c)(3) nonprofits (\$982,424,614)
- 3.25% to federally recognized Native American tribal governments (\$860,956,720)
- 1.5% to public and private universities and colleges (\$402,548,491)
- Less than 1% to a category called "Other," which includes some inter-state cooperatives/commissions such as the "Ozone Transport Commission" and "Great Lakes Commission" (\$174,170,586).

HIGHLIGHTS

- As would be expected given the new funding available to EPA, grant spending increased dramatically in FY 2022, going from \$4.897 to \$7.892 billion—a 61% increase.

TOTAL AMOUNT OF GRANTS AWARDS



- 231 different colleges, universities, or affiliated entities received EPA grant funding, worth over \$402 million.
- Native American tribes received \$860,956,720. The biggest source of that funding is the [National Environmental Performance Partnership System](#), which is “designed to improve the efficiency and effectiveness of EPA partnerships with states, territories, and tribes.”

A description for one such grant worth \$218,055 given in 2022 said: “The Warm Springs Tribe will continue to develop their air quality management capabilities and program through community outreach, education, and collaboration; implementing the federal air rules for reservations; and by assessing air quality.”

GRANT NAME	SUM OF FEDERAL ACTION OBLIGATION
PERFORMANCE PARTNERSHIP GRANTS	\$297,351,070
INDIAN ENVIRONMENTAL GENERAL ASSISTANCE PROGRAM (GAP)	\$221,722,852
SUPERFUND STATE, POLITICAL SUBDIVISION, AND INDIAN TRIBE SITE SPECIFIC COOPERATIVE AGREEMENTS	\$52,176,503
PUGET SOUND PROTECTION AND RESTORATION: TRIBAL IMPLEMENTATION ASSISTANCE PROGRAM	\$47,750,000
STATE AND TRIBAL RESPONSE PROGRAM GRANTS	\$42,387,519
WATER POLLUTION CONTROL STATE, INTERSTATE, AND TRIBAL PROGRAM SUPPORT	\$36,125,265
CAPITALIZATION GRANTS FOR DRINKING WATER STATE REVOLVING FUNDS	\$22,637,577
TRAINING, INVESTIGATIONS, AND SPECIAL PURPOSE ACTIVITIES OF FEDERALLY-RECOGNIZED INDIAN TRIBES CONSISTENT WITH THE CLEAN AIR ACT (CAA), TRIBAL SOVEREIGNTY AND THE PROTECTION AND MANAGEMENT OF AIR QUALITY	\$21,701,396
AIR POLLUTION CONTROL PROGRAM SUPPORT	\$14,393,353
NONPOINT SOURCE IMPLEMENTATION GRANTS	\$13,347,445

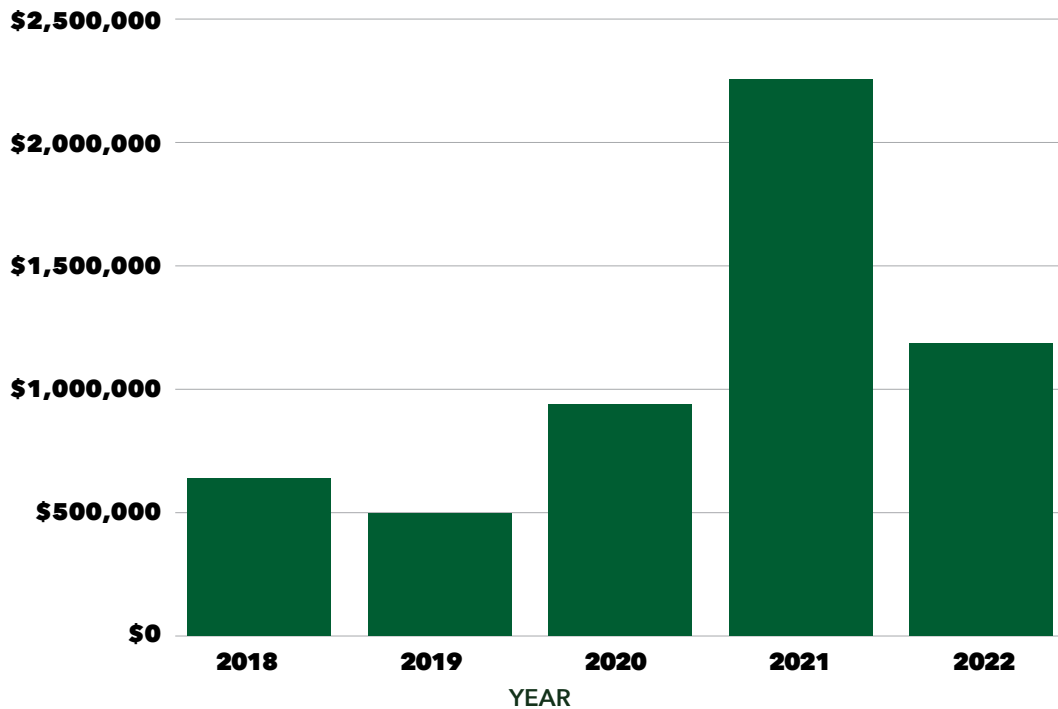
- The two biggest EPA categories grants are listed under are the [Capitalization Grants for Clean Water State Revolving Funds](#), and the [Capitalization Grants for Drinking Water State Revolving Funds](#). A revolving fund is an institution similar to a bank, but lends out low or zero-interest loans to individuals or institutions to complete infrastructure projects, in this case related to water. Every state has a revolving loan fund that can receive funding from these programs.

TOP 10 GRANT CATEGORIES

CATEGORY	SUM OF FEDERAL ACTION OBLIGATION
CAPITALIZATION GRANTS FOR CLEAN WATER STATE REVOLVING FUNDS	\$8,704,232,883
CAPITALIZATION GRANTS FOR DRINKING WATER STATE REVOLVING FUNDS	\$7,718,898,460
PERFORMANCE PARTNERSHIP GRANTS	\$2,347,455,597
NONPOINT SOURCE IMPLEMENTATION GRANTS	\$609,341,510
SUPERFUND STATE, POLITICAL SUBDIVISION, AND INDIAN TRIBE SITE-SPECIFIC COOPERATIVE AGREEMENTS	\$429,067,565
AIR POLLUTION CONTROL PROGRAM SUPPORT	\$368,072,876
WATER POLLUTION CONTROL STATE, INTERSTATE, AND TRIBAL PROGRAM SUPPORT	\$354,986,986
BROWNFIELDS MULTIPURPOSE, ASSESSMENT, REVOLVING LOAN FUND, AND CLEANUP COOPERATIVE AGREEMENTS	\$336,775,781
CHESAPEAKE BAY PROGRAM	\$309,656,376
GREAT LAKES PROGRAM	\$298,392,476

- The EPA had 152 staffers with the title “Grant Manager” on payroll in FY 2022. Collective pay for the year: \$16,272,546. Average pay: \$107,056

EPA INTERNATIONAL ORGANIZATION GRANT SPENDING



Four major international organizations received a total of \$5,527,124 in EPA grants between FY 2018-2022:

- Organisation de Coopération et de Développement Économique (OCDE): \$1,868,780
- United Nations Development Programme (UNDP): \$89,998
- United Nations Environment Programme (UNEP): \$2,803,346
- World Health Organization (WHO): \$765,000

WHO funding, for example, was in relation to a "Memorandum of Understanding between the EPA administrator and director general of WHO, signed first in 1992." The MOU was renewed in [2016](#) and again in [2021](#). According to the grant description "The objective of this cooperative agreement is to stimulate/support the work of WHO related to health and the environment, including risk assessment, which is of value to the international scientific community and nations of the world."

EPA GRANTS: GOVERNMENT RECIPIENTS (\$23.7 BILLION)

The California State Water Resources Control Board with \$1.8 billion and the New York State Department of Environmental Conservation with \$1.2 billion are the only two state entities that received over \$1 billion in EPA grant funding between FY 2018-2022.

When considering all state and local (but not tribal) EPA government funding, California and New York are still number one and two with \$2.2 billion and \$1.5 billion respectively being allocated to various government entities located within the states.

Collectively, the EPA pumped nearly 16% of its total government grant spending to just these two states out of 56 states, territories, and the District of Columbia.

Some states have profited more than others from the extra spending appropriated to the EPA from ARP and IIJA in recent years. From FY 2021-2022 EPA government spending went from \$4,393,048,049 to \$7,290,718,714—an increase of about 60%.

In terms of total spending increase from FY 2021-FY2022, California still dominates the list. Spending grew from \$340 million in FY 2021 to \$892 million in FY 2022, a spike of over \$550 million (162%).

STATE	FUNDING INCREASE OR DECREASE FROM 2021-2022	PERCENT INCREASE OVER FY 2021
CALIFORNIA	\$552,103,253	162%
PENNSYLVANIA	\$214,450,537	139%
MICHIGAN	\$180,323,923	113%
MASSACHUSETTS	\$161,810,366	133%
NEW JERSEY	\$147,294,260	133%



CALIFORNIA: \$2,246,949,291

2018: \$292,972,084
 2019: \$307,534,829
 2020: \$413,392,281
 2021: \$340,473,422
 2022: \$892,576,675

TOP 25 STATE OR LOCAL GOVERNMENT EPA GRANTEES

GRANTEE	SUM OF FEDERAL ACTION OBLIGATION
STATE WATER RESOURCES CONTROL BOARD	\$1,819,691,362
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION	\$1,239,523,901
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY	\$859,006,924
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY	\$845,507,565
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	\$822,678,107
STATE OF OHIO OFFICE OF BUDGET AND MANAGEMENT STATE ACCOUNTING	\$761,608,273
PENNVEST	\$702,195,800
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION	\$684,820,509
TEXAS WATER DEVELOPMENT BOARD	\$641,473,000
NORTH CAROLINA DEPARTMENT OF ENVIRONMENTAL QUALITY	\$608,225,341
MASSACHUSETTS CLEAN WATER TRUST	\$567,913,600
WISCONSIN DEPARTMENT OF NATURAL RESOURCES	\$547,344,402
MARYLAND DEPARTMENT OF THE ENVIRONMENT	\$442,721,641
MISSOURI DEPARTMENT OF NATURAL RESOURCES	\$395,182,139
AL DEPARTMENT ENVIRONMENTAL MANAGEMENT	\$394,220,454
TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION	\$363,032,773
INDIANA FINANCE AUTHORITY	\$346,723,322
ENVIRONMENTAL CONSERVATION ALASKA DEPARTMENT	\$343,373,738
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY	\$324,031,935
IOWA DEPARTMENT OF NATURAL RESOURCES	\$300,350,423
GEORGIA ENVIRONMENTAL FINANCE AUTHORITY	\$285,964,000
COLORADO WATER RESOURCES AND POWER DEVELOPMENT AUTHORITY	\$282,926,000
STATE OF WASHINGTON	\$277,841,299
SOUTH CAROLINA DEPARTMENT OF HEALTH & ENVIRONMENTAL CONTROL	\$277,399,404
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT	\$276,462,256

TOP 25 STATES AND LOCAL GOVERNMENTS RECEIVING THE MOST EPA FUNDS

STATE	SUM OF FEDERAL ACTION OBLIGATION
CALIFORNIA	\$2,246,949,291
NEW YORK	\$1,515,211,572
PENNSYLVANIA	\$941,640,675
MICHIGAN	\$925,504,563
TEXAS	\$914,822,688
ILLINOIS	\$889,512,162
FLORIDA	\$884,657,937
OHIO	\$850,890,653
MASSACHUSETTS	\$714,647,279
NEW JERSEY	\$701,226,528
NORTH CAROLINA	\$639,357,996
WISCONSIN	\$579,946,807
VIRGINIA	\$528,327,827
WASHINGTON	\$521,637,418
MARYLAND	\$495,165,419
INDIANA	\$465,852,991
GEORGIA	\$415,248,405
MISSOURI	\$412,422,554
ALABAMA	\$410,506,206
COLORADO	\$403,466,559
TENNESSEE	\$391,935,420
OKLAHOMA	\$373,765,135
MINNESOTA	\$358,445,611
CONNECTICUT	\$355,595,968
ALASKA	\$354,750,197



Case Study: North American Development Bank

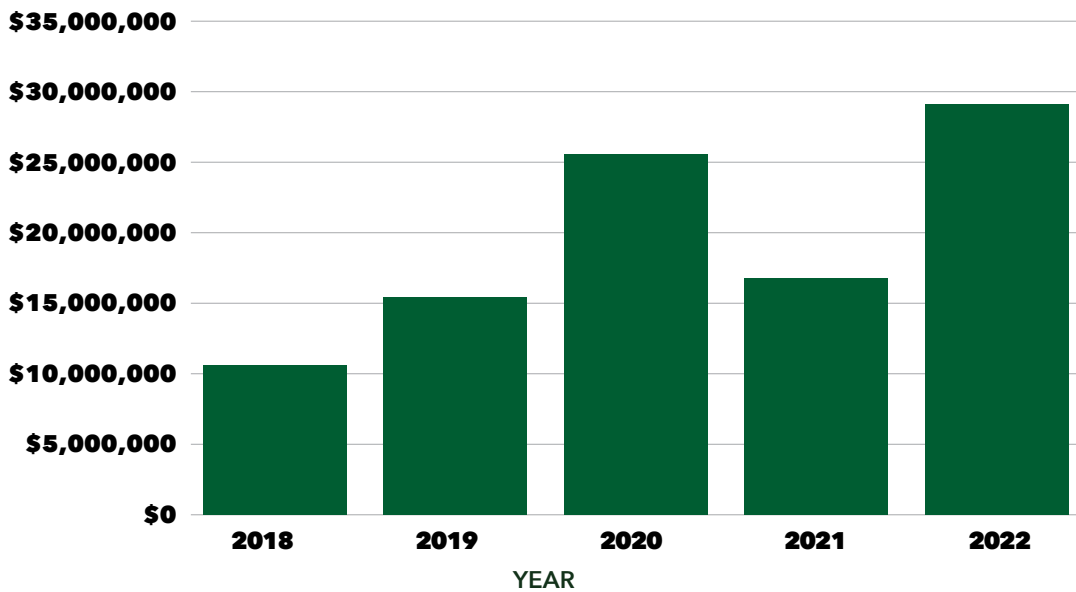
The North American Development Bank (NADBank) is a financial institution operated by both Mexico and the United States. NADBank was founded [in 1994](#) as part of the North American Free Trade Agreement under President Bill Clinton, created together with the Border Environment Cooperative Commission (BECC).

NADBank was charged with running the logistical and financial aspects of projects, while BECC was charged with the technical, environmental, and social aspects of project development. The sister organizations [merged](#) in 2017.

The bank’s mission is to provide “financing to support the development and implementation of environmental infrastructure projects, as well as technical and other assistance for projects and actions that help preserve, protect and enhance the environment of the border region.”

From FY2018-2022 the NADBank received \$97,742,837 in funding from EPA.

EPA NADBANK SPENDING FY2018-2022



NADBank has many functions related to funding environmental border activities, but the EPA grantmaking is particularly involved in two NADBank programs:

- The [Border Environmental Infrastructure Fund \(BEIF\)](#) which funds water and wastewater infrastructure projects located within 100 kilometers (about 62.14 mi) on either side of the border. Our audit identified \$82,021,591 going to BEIF from FY 2018-2022
- If a project is eligible from BEIF funding, it could also receive funding from the Project Development Assistance Program to pay for “technical assistance.”
- EPA gives [examples](#) of technical assistance like “planning studies, environmental assessments, final design, financial analyses, and community participation efforts.” Our audit identified \$52,881,728 going to PDAP activities.

NADBank spending and decision-making processes are guided by a framework designed by the U.S. and Mexico and updated every five years. The most recent iteration, published in 2020, is called [Border 2025](#). The document lists guiding principles such as:

- Preserve the natural environment and reduce public health risks.
- Prioritize environmental equity and address disproportionate environmental impacts.
- Develop and deploy new climate friendly strategies and solutions.

Case Study: Commissions

Aside from funding local and state governments, EPA also grants money to multi-state regional or multi-country “commissions” for various purposes related to environmental governance.

These, along with their FY 2018-2022 funding, include:

- [The New England Interstate Water Pollution Control Commission](#) (\$57,249,524): Established in 1947, an organization dedicated to convening “water quality professionals and other interested parties from New England and New York to collaborate on water, wastewater, and environmental science challenges”
- [The Great Lakes Fishery Commission](#) (\$37,950,786): Established in 1956, a cooperative organization between the U.S. and Canada to manage the Great Lakes fisheries, with a particular focus on combatting the invasive sea lamprey. The two country’s split costs for the commission evenly, except for the [Sea Lamprey Control Program](#), which is funded 69% by the U.S. and 31% by Canada.

One 2018 award worth \$3,967,426 was intended to restore native fish, create a “selective fish passage” and manage the destructive sea lamprey by “exploiting [its] chemosensory communication.”

- [Interstate Environmental Commission](#) (\$5,719,844): [Established](#) in 1931. The IEC is a “water and air pollution control agency committed to protecting, conserving, and restoring the environment” in parts of New York, Connecticut, and New Jersey. Most of the IEC’s funding comes from federal Clean Water Act grants.
- [Interstate Commission on the Potomac River Basin](#) (\$3,679,042): Established in 1940. Members include the federal government, Maryland, Pennsylvania, Virginia, West Virginia, and the District of Columbia. The mission of the organization is to “protect and enhance the waters and related resources of the Potomac River basin through science, regional cooperation, and education.”
- [The Ozone Transport Commission](#) (\$2,178,424): Established in 1991 as a part of the Clean Air Act. Thirteen states in the Northeast and Mid-Atlantic are a part of the OTC jurisdiction. OTC is not a rulemaking organization but works on “model rules” for states and the federal government to consider adopting regarding ground-level ozone.

INTERSTATE/NATIONAL “COMMISSIONS” FUNDED BY EPA	
COMMISSION	SUM OF FEDERAL ACTION OBLIGATION
NEW ENGLAND INTERSTATE WATER POLLUTION CONTROL COMMISSION	\$57,249,524
GREAT LAKES FISHERY COMMISSION	\$37,950,786
INTERSTATE ENVIRONMENTAL COMMISSION	\$5,719,844
INTERSTATE COMMISSION ON THE POTOMAC RIVER BASIN	\$3,679,042
OHIO RIVER VALLEY WATER SANITATION COMMISSION	\$3,310,367
DELAWARE RIVER BASIN COMMISSION	\$3,226,000
SUSQUEHANNA RIVER BASIN COMMISSION	\$3,076,973
OZONE TRANSPORT COMMISSION	\$2,178,424
SOUTHEAST MISSOURI REGIONAL PLANNING & ECONOMIC DEVELOPMENT COMMISSION	\$1,235,564
EAST ALABAMA REGIONAL PLANNING & DEVELOPMENT COMMISSION	\$600,000
GREAT LAKES COMMISSION	\$290,000
GRAND TOTAL	\$118,516,524.00

EPA GRANTS: COLLEGES AND UNIVERSITIES (\$402 MILLION)

The top 25 college and university EPA grant recipients take home more than half of all funding: \$211,071,426. University of North Carolina at Chapel Hill takes the top spot with \$16,370,959 in grants—a likely candidate given the university’s proximity to the EPA’s massive office in the Research Triangle.

According to EPA documents, STAR “funds research on the environmental and public health effects of air quality, environmental changes, water quality and quantity, hazardous waste, toxic substances, and pesticides.” The program was started in 1995.

Between FY 2018-2022 STAR funded 340 projects. Examples include:”

Sorting by project description, the EPA grant-making to colleges and universities covers many areas, although the Science to Achieve Results (STAR) Research Program (\$105 million) is the source of the biggest chunk of funding—about 25%.

According to EPA [documents](#), STAR “funds research on the environmental and public health effects of air quality, environmental changes, water quality and quantity, hazardous waste, toxic substances, and pesticides.” The program was started in 1995.

Between FY 2018-2022 STAR funded 340 projects. Examples include:

- **2022: The Regents of the University of California** (the governing board of the University of California system) received \$1,999,998 to “strategically combine applied research, decision-support innovations, and public engagement to lower barriers to widespread adoption of Enhanced Aquifer Recharge and unlock its potential to provide multiple water security benefits.”
- **2022: Stanford** received \$1,350,000 “to advance the theory and practice of sanitation justice (equitable access, agency, and adaptive capacity for sanitation infrastructure) amidst intensifying climate stressors for marginalized U.S. communities.”
- **2022: Colorado State University** received \$992,464 “to create a communication infrastructure in Colorado for air quality information that (a) enhances the available information about air quality, (b) develops targeted messaging that reaches individuals based on their levels of need and vulnerability, and (c) utilizes trusted sources of information.”

Other areas of funding relate to region-specific programmatic functions of the EPA, such as the [Great Lakes Program](#) (\$32 million), [Gulf of Mexico Program](#) (\$18.7 million), [Chesapeake Bay Program](#) (\$16.9 million), and [Southeast New England Watershed Restoration Program](#) (\$3.9 million).

While each program is different, they each **focus** on “ecosystem and habitat restoration, water quality improvement and water quality monitoring, nutrient reduction, climate resilience, environmental education and outreach, and local capacity building.” Grant descriptions include scientific processes like genetic sequencing, invasive species management, and monitoring for pollution.

As noted in the EPA’s region-specific initiatives [website](#), all such programmatic funding now falls under the scope of the Biden administration’s Justice40 initiative:

“Each program will develop a Bipartisan Infrastructure Law equity strategy which sets a program-specific baseline and Bipartisan Infrastructure Law FY22-26 target, and outline steps to achieve it. The submission of a robust equity strategy is a pre-condition for waiving or reducing non-federal share in outyears (FY23-26) of Bipartisan Infrastructure Law funding, and thereafter waiving/reducing cost-share will be limited to awards that primarily benefit disadvantaged communities.”

We reached out for comment on how new Justice40 requirements will impact the amount and scope of grants given to universities and colleges but received no response.

Case Study: Chesapeake Bay Program

First published in [RealClearPolicy](#) in 2021:

The Environmental Protection Agency will spend \$6.5 million to hire contractors to run a portfolio of websites for one of its regional programs, the [Chesapeake Bay Program partnership](#).

At about 200 miles long, Chesapeake Bay is the largest estuary in the country, with its watershed running through New York, Pennsylvania, Maryland, Delaware, West Virginia, Virginia, and the District of Columbia.

The program seeks to restore the Chesapeake Bay and its watershed. It is made up of partnerships between those states and Washington, D.C., as well as the Chesapeake Bay Commission and the EPA.

The EPA manages the Chesapeake Bay Program, staffed by employees from several federal and state agencies, non-profit organizations, and academic institutions.

So why does the EPA need to award a \$6.5 million grant for someone “to design, develop, update and maintain” the various websites affiliated with the bay’s partnership?

It’s unclear what the problem is with the current website, which receives about 120,000 visits per month, according to SimilarWeb.

The grant recipient will design and develop websites “to be useable and accessible by a broad range of partnership audiences. The content included in those websites needs to be accurate and representative of key partnership messages.”

Nothing rankles taxpayers more than expensive government public relations campaigns – spending our tax dollars to convince taxpayers to spend even more of their money on a larger size and scope of government.



History Lesson: The Golden Fleece Awarded to EPA Study with University of Vermont

Originally published in [RealClearPolicy](#):

In 1978, the Environmental Protection Agency spent \$38,174 – \$173,405 in 2022 dollars – on a two-year study “to find out that runoff from open stacks of cow manure on Vermont farms causes the pollution of the water in nearby small streams and ponds.”

The use of taxpayer funds to study what every farmer already knows, [earned the EPA a Golden Fleece Award in October 1978.](#)

Sen. William Proxmire, a Democrat from Wisconsin, gave awards to wasteful and nonsensical spending, eventually handing out 168 Golden Fleece Awards between 1975 and 1988.

“In this case, the award is for redundancy,” Proxmire said then in giving out the award. “There is not a dairy farmer in all of Wisconsin or Vermont who didn’t know the results and findings of this study before it was made.”

The study, “Alternate Methods of Manure Handling,” was split between two sites: what was then called the University of Vermont Animal Sciences Research Center and a local dairy farm.



TOP 25 EPA GRANT PROGRAMS FUNDING COLLEGES AND UNIVERSITIES

LOCAL GOVERNMENT	SUM OF FEDERAL ACTION OBLIGATION
SCIENCE TO ACHIEVE RESULTS (STAR) RESEARCH PROGRAM	\$105,241,819
GREAT LAKES PROGRAM	\$32,029,277
OFFICE OF RESEARCH AND DEVELOPMENT CONSOLIDATED RESEARCH/ TRAINING/FELLOWSHIPS	\$30,513,762
NATIONAL ESTUARY PROGRAM	\$23,743,269
GULF OF MEXICO PROGRAM	\$18,767,435
POLLUTION PREVENTION GRANTS PROGRAM	\$18,109,503
RESEARCH, DEVELOPMENT, MONITORING, PUBLIC EDUCATION, OUTREACH, TRAINING, DEMONSTRATIONS, AND STUDIES	\$17,613,599
LONG ISLAND SOUND PROGRAM	\$17,007,126
CHESAPEAKE BAY PROGRAM	\$16,956,536
BROWNFIELDS TRAINING, RESEARCH, AND TECHNICAL ASSISTANCE GRANTS AND COOPERATIVE AGREEMENTS	\$12,533,727
REGIONAL WETLAND PROGRAM DEVELOPMENT GRANTS	\$11,513,855
ENVIRONMENTAL FINANCE CENTER GRANTS	\$8,444,956
INTERNSHIPS, TRAINING AND WORKSHOPS FOR THE OFFICE OF AIR AND RADIATION	\$8,340,998
SURVEYS, STUDIES, INVESTIGATIONS, DEMONSTRATIONS, AND TRAINING GRANTS AND COOPERATIVE AGREEMENTS - SECTION 104 (B)(3) OF THE CLEAN WATER ACT	\$6,899,948
SURVEYS, STUDIES, INVESTIGATIONS, DEMONSTRATIONS, AND TRAINING GRANTS - SECTION 1442 OF THE SAFE DRINKING WATER ACT	\$6,350,000
NATIONAL CLEAN DIESEL EMISSIONS REDUCTION PROGRAM	\$5,389,992
CONSOLIDATED PESTICIDE ENFORCEMENT COOPERATIVE AGREEMENTS	\$5,385,059
SOLID WASTE MANAGEMENT ASSISTANCE GRANTS	\$5,136,498
SOUTH FLORIDA GEOGRAPHIC INITIATIVES PROGRAM	\$5,043,780
P3 AWARD: NATIONAL STUDENT DESIGN COMPETITION FOR SUSTAINABILITY	\$4,327,340
TECHNICAL ASSISTANCE FOR TREATMENT WORKS (CLEAN WATER ACT ICWA)SECTION 104 (B)(8))	\$4,000,000
SOUTHEAST NEW ENGLAND COASTAL WATERSHED RESTORATION PROGRAM	\$3,954,218
SURVEYS, STUDIES, RESEARCH, INVESTIGATIONS, DEMONSTRATIONS, AND SPECIAL PURPOSE ACTIVITIES RELATING TO THE CLEAN AIR ACT	\$3,737,596
ENVIRONMENTAL EDUCATION GRANTS	\$3,488,827
ENVIRONMENTAL INFORMATION EXCHANGE NETWORK GRANT PROGRAM AND RELATED ASSISTANCE	\$3,273,823

TOP 25 UNIVERSITY AND COLLEGE RECIPIENTS OF EPA FUNDING

RECIPIENT	SUM OF FEDERAL ACTION OBLIGATION
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL	\$16,370,959
NORTHERN ARIZONA UNIVERSITY	\$14,818,555
UNIVERSITY OF MARYLAND CENTER FOR ENVIRONMENTAL SCIENCE	\$11,674,000
UNIVERSITY OF CALIFORNIA, DAVIS	\$11,526,363
KANSAS STATE UNIVERSITY	\$11,343,656
UNIVERSITY OF CONNECTICUT	\$10,958,597
CENTRAL MICHIGAN UNIVERSITY	\$10,330,424
CORNELL UNIVERSITY	\$9,976,340
UNIVERSITY OF MAINE SYSTEM	\$9,929,544
UNIVERSITY OF NEW MEXICO, THE	\$8,699,439
PURDUE UNIVERSITY	\$8,310,862
TRUSTEES OF INDIANA UNIVERSITY	\$8,042,692
OREGON STATE UNIVERSITY	\$8,006,000
THE RESEARCH FOUNDATION FOR THE STATE UNIVERSITY OF NEW YORK	\$6,808,888
REGENTS OF THE UNIVERSITY OF MINNESOTA	\$6,645,450
MISSISSIPPI STATE UNIVERSITY	\$6,483,977
LOUISIANA STATE UNIVERSITY	\$6,469,041
REGENTS OF THE UNIVERSITY OF CALIFORNIA, THE	\$6,298,062
IOWA STATE UNIVERSITY OF SCIENCE AND TECHNOLOGY	\$5,841,622
FLORIDA INTERNATIONAL UNIVERSITY	\$5,779,167
UNIVERSITY OF ILLINOIS	\$5,726,718
MICHIGAN STATE UNIVERSITY	\$5,650,571
UNIVERSITY OF PUERTO RICO MEDICAL SCIENCES CAMPUS	\$5,164,366
UNIVERSITY OF WISCONSIN SYSTEM	\$5,134,961
PRESIDENT & FELLOWS OF HARVARD COLLEGE	\$5,081,172

EPA GRANTS: 501(C)3 NONPROFITS (\$982 MILLION)

Just because an organization is a 501(c)3 nonprofit doesn't mean it's not making a lot of money. Eleven of EPA's top nonprofit grantees received over \$10 million from the agency between FY 2018-2022.

Note to readers: The North American Development Bank is sometimes labeled as a 501(c)3 nonprofit in the EPA spending documents, although NADBank is not a 501(c)3 nonprofit. The NADBank website calls the organization a "binational financial institution." Because it is governed by representatives from both Mexico and the United States, OpenTheBooks auditors included the NADBank case study in the "government grants" section.

Case Study: The National Fish and Wildlife Foundation (\$150 million)

The National Fish and Wildlife Foundation tops the list of EPA grantees with over \$150 million in grants over five years. NFWF in turn makes its own grants through programs intended to conserve wildlife and ecosystems in the United States and abroad. The organization [says](#) it works "with both the public and private sectors to protect and restore our nation's fish, wildlife, plants and habitats for current and future generations."

In FY 2020, the year with the latest available [data](#), NFWF received \$183,330,991 in contributions and grants from all sources.

NFWF has a lot of funds to manage and spend, which is likely how the nonprofit's executives justify their large salaries. Total compensation in 2020 includes:

- Jeffrey Trandahl, CEO, \$1,555,465
- Timothy Dicintio, Senior VP, Impact-Directed Environmental Accounts, \$550,366
- Thomas Kelsch, Senior VP, Gulf Environmental Benefit Fund, \$543,366
- Lila Helms, Executive VP, External Affairs, \$535,853

Collectively the eleven foundation executives took home \$6,162,327

NFWF also boasts an intriguing slate of board directors—all approved by the Secretary of the Department of Interior, which [include](#):

- Mark Bezos, billionaire Jeff Bezos' brother and a director of the Bezos Family Foundation
- K.C. Walsh, executive chairman of Simms Fishing Products
- Bruce Culpepper, retired president of Shell Oil Company
- Richard W. Spinrad, NOAA administrator
- Martha Willians, U.S. Fish and Wildlife Service director

EPA records indicate the agency granted NFWF \$23,259,754 that year. In 2022 that number had nearly tripled to \$60,035,656

NATIONAL FISH AND WILDLIFE FOUNDATION: \$150,497,072	
YEAR	SUM OF FEDERAL ACTION OBLIGATION
2018	\$15,003,000
2019	\$17,837,894
2020	\$23,259,754
2021	\$34,360,768
2022	\$60,035,656

The largest single grant was \$15,000,000 in FY 2022, using Infrastructure Investment and Jobs Act funding for projects related to the Chesapeake Bay Program.

Case Study: Senior Environmental Employment (\$175 million in total spending)

The biggest EPA grant program funding 501(c)3 nonprofits is Senior Environmental Employment (SEE).

According to the EPA [website](#), “The Senior Environmental Employment (SEE) Program provides an opportunity for retired and unemployed Americans age 55 and over to share their expertise with U.S. EPA, remaining active using their matured skills in meaningful tasks that support a wide variety of environmental programs.”

The EPA started the SEE program under President Reagan, supporting the program through grants to non-profit senior organizations.

SEE participants are not considered federal employees, or employees of the grantee organization they work with. The grantee organization administers the salary, benefits, vacation, sick leave, and other human resources duties for the SEE participant, and a federal employee monitors participant productivity.

There are three **tiers** of SEE work:

Tier A, administrative support, \$15.00-\$18.00 per hour

Tier B, technical and moderate professional, \$18.01-\$21.00 per hour

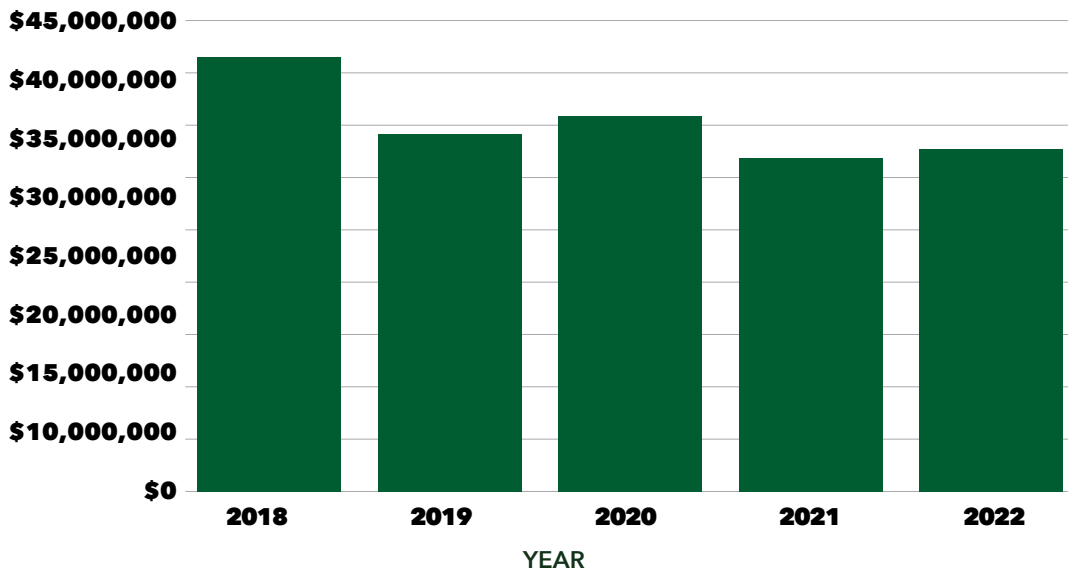
Tier C, independent professional, \$21.01-\$27.00 per hour

In FY 2018-FY 2022 EPA spent \$175,842,679 in SEE grants, mostly to five organizations:

YEAR	SUM OF FEDERAL ACTION OBLIGATION
NATIONAL EXPERIENCED WORKFORCE SOLUTIONS, INC.	\$70,777,826
CENTER FOR WORKFORCE INCLUSION INC	\$41,050,713
NATIONAL ASIAN PACIFIC CENTER ON AGING	\$32,893,593
NATIONAL CAUCUS CENTER	\$23,382,306
ASOCIACION NACIONAL PRO PERSONAS MAYORES (INC)	\$8,405,682

Unlike a lot of EPA grant spending, SEE spending totals actually decreased from a five-year high in 2018, perhaps because of COVID-19 restrictions impacting workers, especially elderly workers, during the pandemic years.

TOTAL SEE GRANT SPENDING FY2018-2022



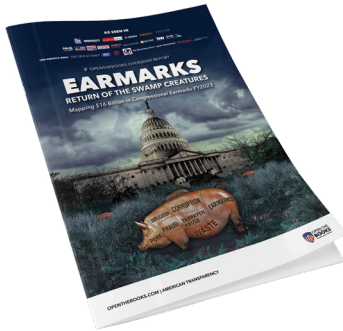
TOP 25 501(C)3 NONPROFITS RECEIVING GRANTS FROM EPA	
NONPROFIT	SUM OF FEDERAL ACTION OBLIGATION
NATIONAL FISH AND WILDLIFE FOUNDATION	\$150,497,072
NORTH AMERICAN DEVELOPMENT BANK	\$93,234,047
NATIONAL EXPERIENCED WORKFORCE SOLUTIONS, INC.	\$70,812,962
RURAL COMMUNITY ASSISTANCE PARTNERSHIP INCORPORATED	\$49,536,000
CENTER FOR WORKFORCE INCLUSION INC	\$41,050,713
NATIONAL ASIAN PACIFIC CENTER ON AGING I	\$34,054,794
NATIONAL RURAL WATER ASSOCIATION	\$31,439,000
HEALTH EFFECTS INSTITUTE, THE	\$26,200,000
NATIONAL CAUCUS CENTER	\$23,382,306
RESTORE AMERICA'S ESTUARIES	\$20,804,828
AMERICAN LUNG ASSOCIATION	\$17,427,397
NORTH AMERICAN ASSOCIATION FOR ENVIRONMENTAL EDUCATION, INC.	\$10,713,750
MID-ATLANTIC REGIONAL AIR MANAGEMENT ASSOCIATION, INC	\$9,538,531
THE WATER RESEARCH FOUNDATION	\$8,964,889
ASOCIACION NACIONAL PRO PERSONAS MAYORES (INC)	\$8,405,682
ALLIANCE OF ROUGE COMMUNITIES	\$8,186,335
NATIONAL ASSOCIATION OF CLEAN AIR AGENCIES	\$8,076,960
COALITION FOR SUSTAINABLE INITIATIVES INC	\$7,803,106
SOUTHWEST DETROIT ENVIRONMENTAL VISION	\$7,699,166
ALLIANCE FOR THE CHESAPEAKE BAY, INC.	\$7,584,978
CHESAPEAKE RESEARCH CONSORTIUM INC	\$7,094,903
ENVIRONMENTAL COUNCIL OF STATES, INC.	\$6,485,175
ASSOCIATION OF STATE AND TERRITORIAL SOLID WASTE MANAGEMENT OFFICIALS, INC	\$6,312,244
UNIVERSITY OF NEW ORLEANS RESEARCH AND TECHNOLOGY FOUNDATION INC	\$6,181,000
CHESAPEAKE CONSERVANCY, INC.	\$6,171,423
CONNECTICUT MARITIME FOUNDATION, INC.	\$5,843,400

TOP 25 EPA GRANT CATEGORIES USED TO FUND 501(C)3 NONPROFITS

PROGRAM	SUM OF FEDERAL ACTION OBLIGATION
SENIOR ENVIRONMENTAL EMPLOYMENT PROGRAM	\$175,842,529
CHESAPEAKE BAY PROGRAM	\$148,321,748
CONGRESSIONALLY MANDATED PROJECTS	\$90,657,102
SURVEYS, STUDIES, INVESTIGATIONS, DEMONSTRATIONS, AND TRAINING GRANTS - SECTION 1442 OF THE SAFE DRINKING WATER ACT	\$69,639,659
NATIONAL ESTUARY PROGRAM	\$41,611,230
DIESEL EMISSION REDUCTION ACT (DERA) NATIONAL GRANTS	\$40,113,415
SURVEYS, STUDIES, RESEARCH, INVESTIGATIONS, DEMONSTRATIONS, AND SPECIAL PURPOSE ACTIVITIES RELATING TO THE CLEAN AIR ACT	\$38,078,184
OFFICE OF RESEARCH AND DEVELOPMENT CONSOLIDATED RESEARCH/ TRAINING/FELLOWSHIPS	\$36,320,449
LONG ISLAND SOUND PROGRAM	\$33,789,769
BROWNFIELDS MULTIPURPOSE, ASSESSMENT, REVOLVING LOAN FUND, AND CLEANUP COOPERATIVE AGREEMENTS	\$33,519,349
NATIONAL CLEAN DIESEL EMISSIONS REDUCTION PROGRAM	\$32,912,140
GULF OF MEXICO PROGRAM	\$23,309,832
GREAT LAKES PROGRAM	\$21,385,636
BROWNFIELDS ASSESSMENT AND CLEANUP COOPERATIVE AGREEMENTS	\$18,003,137
SURVEYS, STUDIES, INVESTIGATIONS, DEMONSTRATIONS, AND TRAINING GRANTS AND COOPERATIVE AGREEMENTS - SECTION 104 (B) (3) OF THE CLEAN WATER ACT	\$13,994,583
NATIONAL ENVIRONMENTAL EDUCATION TRAINING PROGRAM	\$10,738,750
SCIENCE TO ACHIEVE RESULTS (STAR) RESEARCH PROGRAM	\$9,693,015
ENVIRONMENTAL EDUCATION GRANTS	\$8,644,864
ENVIRONMENTAL JUSTICE SMALL GRANT PROGRAM	\$8,493,960
ENVIRONMENTAL JUSTICE COLLABORATIVE PROBLEM-SOLVING COOPERATIVE AGREEMENT PROGRAM	\$8,292,645
SOUTHEAST NEW ENGLAND COASTAL WATERSHED RESTORATION	\$8,054,828
TECHNICAL ASSISTANCE FOR TREATMENT WORKS (CLEAN WATER ACT [CWA] SECTION 104 (B)(8))	\$8,000,000
BROWNFIELDS TRAINING, RESEARCH, AND TECHNICAL ASSISTANCE GRANTS AND COOPERATIVE AGREEMENTS	\$7,985,830
RESEARCH, DEVELOPMENT, MONITORING, PUBLIC EDUCATION, OUTREACH, TRAINING, DEMONSTRATIONS, AND STUDIES	\$7,500,803

PREVIOUS OVERSIGHT

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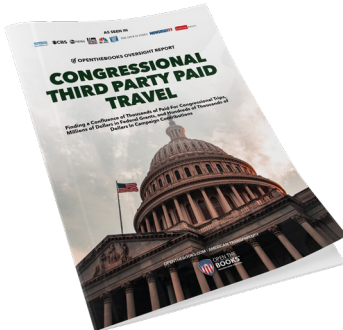
EARMARKS: RETURN OF THE SWAMP CREATURES



IMPROPER PAYMENTS



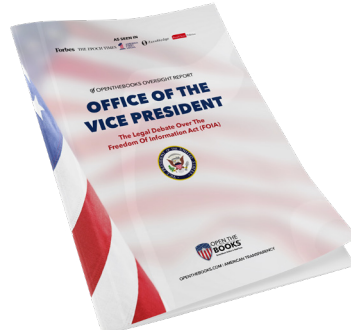
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CONGRESSIONAL THIRD PARTY PAID TRAVEL



WHITE HOUSE PAYROLL



OFFICE OF THE VICE PRESIDENT
The Legal Debate Over The Freedom Of Information Act

AS FEATURED IN

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IN 2021-2022...

Identified Dr. Anthony Fauci as the top paid federal employee, quantified the staggering cost of U.S. military gear left behind in Afghanistan, cracked open California's state checkbook and Big Pharma's \$1.4 billion in third-party paid royalties – leading to four televised congressional hearings in 2022.

IN 2020...

The President's Budget To Congress FY2021 included a first-ever chapter, "Stopping Wasteful and Unnecessary Spending," which was inspired by our oversight report, *Where's The Pork? A Study of \$600 Billion In Federal Grants*. Included in the President's Budget was our report, *Use-It-Or-Lose-It - How The Federal Government Spent \$97 Billion In September 2018*.

IN 2019...

Our Top 82 U.S. Non-Profit Hospitals: Quantifying Government Payments & Financial Assets report launched on *FOX News' Tucker Carlson Tonight* and *USA TODAY*. This report backstopped President Trump's two executive orders on healthcare price transparency by showing that wealthy charitable non-profit healthcare providers and their CEO's were making big profits. Colorado Governor Jared Polis (D) also cited this data in his state of the state address while arguing for price reforms.

IN 2018...

Open The Books' Mapping The Swamp, A Study Of The Administrative State Media report launched on *FOX News' The Ingraham Angle* and directly led to Representative Judy Hice's (R-GA) legislation on pension and bonus transparency (H.R. 2612). Furthermore, we briefed the Executive Office of the President, Office of Management & Budget regarding our policy ideas to drain the swamp.

IN 2017...

The Tax Cuts And Jobs Act 2017, passed into law and included a claw-back tax on Ivy League-style, excessive university endowments. The *Boston Globe* cited our Ivy League, Inc. oversight report as a catalyst for the legislative provision. Coverage included *The Wall Street Journal* and eight segments on *Fox News*.

IN 2016...

We exposed the \$20 million luxury-art procurement program at the Department of Veterans Affairs, which forced a public apology from the V.A. Secretary and the adoption of new rules to stop the abuse. Coverage included *Good Morning America* and *ABC World News Tonight*.

IN RECOGNITION OF OUR TEAM

Adam Andrzejewski
Chief Executive Officer
& Founder

Craig Mijares
Chief Operating
Officer

Courtenay Lyons
Development
Director

Christopher Neefus
Communications
Director

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Milan Erastus-Obilo
Video
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