



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

American Recovery and Reinvestment Act Site Visit of the Elizabeth City Well Field Expansion Project, Elizabeth City, North Carolina

Report No. 12-R-0109

December 8, 2011



Scan this mobile code to learn more about the EPA OIG.

Report Contributors:

Jean Bloom
Phil Cleveland
Patrick McIntyre
Shannon Schofield

Abbreviations

CFR	Code of Federal Regulations
DWSRF	Drinking Water State Revolving Fund
EPA	U.S. Environmental Protection Agency
NCDENR	North Carolina Department of Environment and Natural Resources

Cover photo: Well head at the Elizabeth City Well Field Expansion Site, Elizabeth City, North Carolina. (EPA OIG photo)

Hotline

To report fraud, waste, or abuse, contact us through one of the following methods:

e-mail: OIG_Hotline@epa.gov.
phone: 1-888-546-8740
fax: 202-566-2599
online: <http://www.epa.gov/oig/hotline.htm>.

write: EPA Inspector General Hotline
1200 Pennsylvania Avenue NW
Mailcode 2431T
Washington, DC 20460



At a Glance

Why We Did This Review

The U.S. Environmental Protection Agency Office of Inspector General conducts site visits of American Recovery and Reinvestment Act of 2009 (Recovery Act) clean water and drinking water projects. The purpose of the visits is to confirm compliance with selected Recovery Act requirements. We selected the Elizabeth City Well Field Expansion Project in Elizabeth City, North Carolina, for review.

Background

The city received a \$2,366,255 Recovery Act loan from the North Carolina Department of Environment and Natural Resources (NCDENR) under the Drinking Water State Revolving Fund program. The loan included \$1,183,127 in principal forgiveness. The city will expand its well field with four new wells to meet the state's 12 hour/day maximum pumping requirement.

For further information, contact our Office of Congressional and Public Affairs at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2012/20111208-12-R-0109.pdf

American Recovery and Reinvestment Act Site Visit of the Elizabeth City Well Field Expansion Project, Elizabeth City, North Carolina

What We Found

We conducted an unannounced site visit of the Elizabeth City Well Field Expansion Project in Elizabeth City, North Carolina, in July 2010. We toured the project site; interviewed city, NCDENR, engineering firm, and prime contractor and subcontractor personnel; and reviewed documentation related to Recovery Act requirements.

In the draft report, we questioned whether three manufactured goods used on the project met the Buy American requirements of Section 1605 of the Recovery Act, and whether engineering costs claimed were allocable to the Recovery Act project. In response to the draft report, the city provided additional information to support Buy American compliance for one item. The city took corrective action and added the two remaining items to the project's Buy American de minimis waiver list. We reviewed the de minimis list and concurred with the action taken by the city to include those items on the list. We analyzed additional engineering support received from Region 4 and the city, and agree that the costs incurred prior to the Recovery Act were needed to make the project shovel-ready and, therefore, were allocable to the project.

No additional issues or concerns came to our attention that would require action from the city, NCDENR, or the U.S. Environmental Protection Agency.



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

THE INSPECTOR GENERAL

December 8, 2011

MEMORANDUM

SUBJECT: American Recovery and Reinvestment Act Site Visit of the
Elizabeth City Well Field Expansion Project,
Elizabeth City, North Carolina
Report No. 12-R-0109

FROM: Arthur A. Elkins, Jr.
Inspector General

A handwritten signature in black ink, appearing to read "Arthur A. Elkins, Jr.", is written over the printed name of the Inspector General.

TO: Gwendolyn Keyes Fleming
Regional Administrator, Region 4

This is our report on the subject site visit conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. The report summarizes the results of our site visit of the Elizabeth City Well Field Expansion Project.

We performed this site visit as part of our responsibility under the American Recovery and Reinvestment Act of 2009 (Recovery Act). The purpose of our site visit was to determine the city's compliance with selected requirements of the Recovery Act pertaining to the Drinking Water State Revolving Fund program. The city received a \$2,366,255 Recovery Act loan from the North Carolina Department of Environment and Natural Resources with \$1,183,127 of principal forgiveness.

Action Required

Because this report contains no recommendations, you are not required to respond to this report. The report will be made available at <http://www.epa.gov/oig>. If you or your staff have any questions regarding this report, please contact Melissa Heist, Assistant Inspector General for Audit, at (202) 566-0899 or heist.melissa@epa.gov; or Robert Adachi, Director of Forensic Audits, at (415) 947-4537 or adachi.robert@epa.gov.

Table of Contents

Purpose	1
Background	1
Scope and Methodology	1
Results of Site Visit	2
Buy American Requirements.....	2
Wage Rate Requirements	2
Financial Management and Reporting	3
Contract Procurement	3
Recommendations	4
City and Region 4 Responses	4
Office of Inspector General Comment	5
Status of Recommendations and Potential Monetary Benefits	6

Appendices

A City of Elizabeth City Response to Draft Report	7
B EPA Region 4 Response to Draft Report	11
C Distribution	13

Purpose

The purpose of our unannounced site visit was to determine the City of Elizabeth City's compliance with selected requirements of the American Recovery and Reinvestment Act of 2009 (Recovery Act), P.L. 111-5, pertaining to the Drinking Water State Revolving Fund (DWSRF) program.

Background

On April 14, 2009, the U.S. Environmental Protection Agency (EPA) awarded a grant for \$65,625,000 to the North Carolina Department of Environment and Natural Resources (NCDENR) under the Recovery Act to capitalize its revolving loan fund for financing the construction of drinking water facilities, green infrastructure, program administration, and drinking water related activities. In addition to the regulatory requirements in Title 40 Code of Federal Regulations (CFR) Chapter 1, Subchapter B, the assistance award was subject to 2 CFR Part 176, *Award Terms For Assistance Agreements That Include Funds Under the American Recovery and Reinvestment Act of 2009, Public Law 111-5*.

In June 2009, the city entered into a loan agreement with NCDENR under the DWSRF program to expand its well field with four new wells to meet the state's 12 hour/day maximum pumping requirement. The city received a Recovery Act loan totaling \$2,366,255, which included \$1,183,127 of principal forgiveness.

Scope and Methodology

Due to the time-critical nature of Recovery Act requirements, we did not perform this assignment in accordance with generally accepted government auditing standards. Specifically, we did not perform certain steps that would allow us to obtain information to assess the city's internal controls and any previously reported audit concerns. As a result, we do not express an opinion on the adequacy of the city's internal controls or its compliance with all federal, state, or local requirements.

We conducted an unannounced site visit during the week of July 19, 2010. On March 23–24, 2011, we performed a follow-up visit to the engineering firm hired by the city to obtain Buy American certification documents. During our visits we:

1. Toured the project site
2. Interviewed employees and managers on site, as well as city, engineering, NCDENR, and prime contractor personnel
3. Reviewed documentation provided by the city, its contracted engineering firm, NCDENR, and prime and subcontractors on the following matters:
 - a. Buy American requirements under Section 1605 of the Recovery Act

- b. Wage Rate requirements (Davis-Bacon Act) under Section 1606 of the Recovery Act
- c. Limits on funds and reporting requirements under Sections 1604 and 1512 of the Recovery Act
- d. Contract procurement

Results of Site Visit

Based on our site visit, no issues or concerns came to our attention that would require action from the city, NCDENR, or EPA. The results of our work are summarized below.

Buy American Requirements

In the draft report, we questioned whether three manufactured goods used on the project met the Buy American requirements of Section 1605 of the Recovery Act. We changed our position after analyzing additional information provided by the city in response to the draft report. The information provided demonstrated that one item met the requirements for substantial transformation. The city also submitted a revised de minimis list, which included two items originally questioned for not meeting Buy American requirements. We reviewed the Buy American de minimis waiver list and concurred with the action taken by the city to include those items on the list.

We did not identify any issues or concerns regarding Buy American requirements. Based on our interviews and work performed, the city, its contracted engineer, and contractor are fully aware of the Buy American requirements under Section 1605 of the Recovery Act. The Buy American requirements were included in contract documents. The city relied on its contracted engineer to review Buy American certifications. The engineer stayed up to date with Buy American guidance by visiting the NCDENR website and attending training. The engineer and prime contractor rejected and substituted some of the manufacturers based upon Buy American guidance. Based on our physical observations of materials on site, our review of Buy American supporting documentation, and Internet research performed on the manufacturers, materials used for the project comply with Buy American requirements.

Wage Rate Requirements

We did not identify any issues or concerns regarding the city's compliance with wage rate requirements. Section 1606 of the Recovery Act requires all mechanics and laborers employed on projects funded directly by—or assisted in whole or in part with—Recovery Act funds to be paid wages at rates no less than the locally prevailing rate, as determined by the U.S. Department of Labor. These wages are commonly known as Davis-Bacon Act wages and generally include a requirement that employers submit certified payroll reports to the U.S. Department of Labor.

The contractor submitted signed certified payrolls to certify compliance with wage rate requirements. We selected two pay periods for review and testing—the pay periods beginning May 3, 2010, and July 19, 2010. We reviewed certified payrolls and verified that the contractor and subcontractors were paying their employees at least the minimum required prevailing wage rates.

Financial Management and Reporting

We did not identify any issues or concerns with the city’s ability to meet the reporting requirements under Section 1512 of the Recovery Act. We reviewed documents that showed the reimbursement process for the city. The city submits its reimbursement request to the NCDENR’s Division of Water Quality, Construction Grants and Loans Section. Based on our review of these documents, no issues or concerns came to our attention.

We obtained copies of the Recovery Act jobs created/retained reports submitted to the NCDENR. These reports are used in preparing the report required under Section 1512 (c) of the Recovery Act. Based upon the information provided, nothing came to our attention that caused us to take exception with the subrecipient’s compliance with Section 1512 (c).

We did not identify any issues or concerns with the city’s compliance with Section 1604, which states that Recovery Act funds cannot be used for any casino or other gambling establishment, aquarium, zoo, golf course, or swimming pool. Based upon our review of the loan document and contract project specifications, and observations at the site, the funds were not being used for any prohibited items identified in the Recovery Act.

Contract Procurement

We reviewed the city’s procurement of its contractor. We did not identify any issues or areas of concern with contract procurement. The city solicited bids twice for the project and received one bid each time. A notice of award was signed by the city in 2007. An EPA Region 4 employee initially communicated to NCDENR that the project should be re-bid based on the age of the bid and the possibility of reducing the project’s price. The city provided legal documents from its attorney that indicated the city could potentially lose a lawsuit because the city had signed a notice of award with the contractor. NCDENR managers requested specific statutory citations and language from EPA that would support their decision to have the city re-bid the project. EPA headquarters determined that as long as the contractor is willing to incorporate all necessary Recovery Act provisions and requirements in the contract, and comply with the provisions, the project can move forward without being re-bid. Change order 1 incorporated the Recovery Act requirements into the contract.

Recommendations

We have no recommendations.

City and Region 4 Responses

The Office of Inspector General received comments to the draft report and supplemental information from the city and Region 4. NCDENR did not provide written comments to our draft report.

The city disagreed with the following findings in the site visit report:

1. The city did not provide sufficient documentation to assure compliance with the Buy American requirements.
2. The city claimed reimbursement for engineering costs outside of the scope of the Recovery Act project.

The city provided supplemental documentation for the electrical switchgear and included the site lights and poles on their project de minimis list. The city disagreed that the non-Recovery Act-funded equipment was subject to Buy American provisions because it was supplied and owned by the city's electric distribution utility and not the water and sewer utility, which are two separate enterprise accounts. The city disagreed with the engineering costs finding because the purpose of the project was to increase the safe yield of the city's well field, and these were necessary preliminary assessment costs needed for the project to accomplish that goal. The full text of the city's comments and the Office of Inspector General detailed responses are included in appendix A.

Region 4 agreed with the Buy American issues identified in the report for the electrical switchgear, and the site lights and poles. The region disagreed that the non-Recovery Act-funded transformer was subject to the Buy American provisions because it was not included in the engineering plans and specifications for the project, nor was it procured or installed by the project contractor and/or subcontractors. The region disagreed with the recommendation to recover the engineering costs associated with the planning phase of the project because the state reviewed the costs and determined that they were eligible expenses per state procurement laws and regulations. The full text of Region 4's comments is included in appendix B.

On October 18, 2011, we held an exit conference with representatives from EPA Region 4, NCDENR, and the city. We were informed that Region 4 worked collaboratively with NCDENR on the Region 4 response. Region 4, NCDENR, and the city disagreed with the Office of Inspector General's determination that non-Recovery Act-funded equipment was subject to Buy American requirements. However, the city reluctantly agreed to include the non-Recovery Act-funded equipment on the de minimis list, to avoid a finding. Region 4, NCDENR, and the

city disagreed that the engineering costs for well rehabilitation and well number 12 were outside the scope of the project. Region 4 and the city subsequently provided additional supporting documentation to substantiate their position.

Office of Inspector General Comment

We modified our report based upon the additional Buy American documentation received from the city. We evaluated the additional documentation provided to justify substantial transformation for the electrical switchgear and determined that it was sufficient to meet the guidelines for substantial transformation. We reviewed and concurred with the action taken by the city to include the costs for site lights and poles and non-Recovery Act-funded equipment on the de minimis list.

Based upon our exit conference and review of the supplemental documentation provided, we agree that the engineering costs incurred for rehabilitating existing wells and exploring well number 12's viability were necessary to make the Recovery Act-funded well field project shovel-ready. We adjusted the report accordingly.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
No recommendations							

¹ O = recommendation is open with agreed-to corrective actions pending
 C = recommendation is closed with all agreed-to actions completed
 U = recommendation is unresolved with resolution efforts in progress

City of Elizabeth City Response to Draft Report

MAYOR
ROGER McLEAN
MAYOR PRO TEM
ANITA HUMMER
CITY MANAGER
RICHARD C. OLSON
CITY CLERK

DIANNE PIERCE-TAMPLEN, MMC



CITY COUNCIL MEMBERS

JEAN M. BAKER
MICHAEL E. BROOKS
RICKEY E. KING
LENA HILL-LAWRENCE
BETTY S. MEGGS
JOSEPH A. STIMATZ
JOHNNIE B. WALTON

CITY OF ELIZABETH CITY

September 7, 2011

Robert Adachi
Director of Forensic Audits
75 Hawthorne Street
San Francisco, CA 94105

RE: Site Visit Report - Elizabeth City Well Field Expansion Project
EPA Project No. OA-FY10-A-0203

Mr. Adachi,

The City has reviewed the Report of the Office of Inspector General USEPA Recovery and Reinvestment Act site visit of the Elizabeth City Well Field Expansion Project, Elizabeth City North Carolina. The City does not agree with either of the significant findings of the site visit report, which are as follows:

1. The City did not provide sufficient documentation to assure compliance with the Buy American requirements of the section 1605 of the Recovery Act.
2. The City claimed costs for engineering services outside of the scope of the Recovery Act Project.

Elizabeth City offers the following additional information to be considered by the EPA Office of Inspector General before the Site Visit Report is published as a Final Report for General Circulation and before the Region 4 Regional Administrator must determine or negotiate appropriate remedial action.

1. The City did not provide sufficient documentation to assure compliance with the Buy American requirements under section 1605 of the Recovery Act. There were three findings regarding the Buy American requirements of the Act:

- A. The Siemens Manufacturer of the electric switch gear provided a substantial transformation checklist, for which EPA requested additional information. In part, Elizabeth City rejected submittal 6 and 6a requiring additional information of the 'Substantial Transformation Documentation.' Attached are copies of the final documentation Submittal 6b and, as requested by EPA, and a memorandum from Siemens Industry, Inc. providing the additional documentation regarding compliance with the Buy American provisions of the Act. Based on the attached Siemens information and the City's April 14th response to EPA's communications, the City believes that we provided full documentation and that the Siemens Electric Switch Gear equipment is compliant with the Buy American provisions.

OIG Response: The city provided additional information from Siemens regarding the manufacturing process followed for its electric panels. This includes fabricating raw materials (sheet metal, copper, and aluminum/copper or aluminum) into a specific shape/form (panel board enclosure/interior conductors), combining and assembling together with other assemblies (circuit breakers) and raw materials (screws, wiring) to produce an electrical panel board for a specific order/application. Based on our analysis of this information, we have determined that sufficient documentation has been provided to support substantial transformation. As a result, we adjusted the report accordingly.

- B. The Second finding regarding the Buy American provisions of the Act was in reference to the Acuity Brands lighting for site lights and poles. The City agreed that the Buy American documentation was not sufficient to comply with the Act. However, on July 1st we asked the contractor, AG Schultz, to include the light poles on the 'De-Minimums' list of materials and supplies. Attached is Schulte's letter to us including 'Item H. - KAD light poles and fixtures.' To date, the 'De-Minimums' items for the project total \$8,894.41, or less than 2.2% of the materials, which is well within the 5% De-Minimums allowed by the Act.

OIG Response: We reviewed the revised de minimis list and agree with the action taken. We adjusted the report accordingly.

- C. The third and final finding regarding the Buy American provisions of the Act included a transformer labeled "Made in Mexico" valued at \$3,641.00. The finding of the site visit report was that the Buy American provisions of the Act precluded the intentional splitting of ARRA projects into separate and smaller contracts to avoid Buy American coverage.

The City strongly objects to the consideration that actions were taken to "split the purchase" to avoid compliance. The transformer is supplied and owned by the City's Electric Distribution Utility and not the Water and Sewer Utility. The transformer in question was supplied by the Electric Distribution Utility to deliver the proper current at the proper voltage for the well pumps.

The City does acknowledge that both the Electric Distribution Utility and the Water and Sewer Utility are Enterprise Funds of the City, managed by the City. The two funds are established under North Carolina Law, specifically NCGS §159-26, as separate financial entities. I have enclosed the pertinent pages of the City of

Elizabeth City 'Comprehensive Annual Financial Report', which reflect that they are separate, stand alone funds. To infer that the City's Water and Sewer Utility had control over equipment purchased by the City's Electric Distribution Utility would mean that every power supply company that services an ARRA funded project would be subject to the Buy American Provisions of the Act.

If EPA elects to determine that the Electric Distribution Utility is subject to the Buy American Provisions of the Act, the City would request that the transformer cost be added to the De-Minimums list.

OIG Response: While we understand that this transformer was purchased by the City's Electric Distribution Utility, which has its own enterprise funds separate from the Water and Sewer Utility, we disagree that the equipment should not comply with Buy American provisions of the Recovery Act. An April 28, 2009, EPA guidance document, *American Recovery and Reinvestment Act of 2009*, which discusses implementation of Buy American provisions of P.L. 111-5, states in part that "... any project that is funded in whole or in part with ARRA funds, must comply with the Buy American provisions." The guidance document further defines a "project" as all construction necessary to complete the building or work regardless of the number of contracts or assistance agreements involved so long as all contracts and assistance agreements awarded are closely related in purpose, time, and place. The transformer was purchased by the city's Electrical Utility in May 2010 to deliver the proper current and the proper voltage for the well pumps. This clearly demonstrates the relationship in purpose (for the well pumps), time (during the construction of the Recovery project), and place (for use at the well field). Further, the EPA guidance document states that Buy American provisions will apply to prevent splitting projects into separate and smaller contracts or assistance agreements, particularly where the activities are integrally and proximately related to the whole. The transformers are integrally related to the project because they supply the necessary voltage to the pumps and are proximately related because they are located in three of four well head electrical sheds at the project site. Given the close relationship in purpose, time, and place, and the integral and proximate location of the transformer to the overall project, we believe that the Buy American provisions apply. After the exit conference, the city updated its de minimis list to include the transformers. We agree with that action and adjusted the report accordingly.

2. The City claimed costs for engineering services outside of the scope of the Recovery Act Project:

The purpose of the project was to increase the safe yield of the City's well field. Projects of this magnitude require preliminary assessment of options to accomplish the goal. Investigation of the existing well field and alternative well location is certainly within the generally accepted standards of preliminary engineering for this work. The City believes that all of the engineering costs submitted for ARRA reimbursement are a legitimate project cost for well field expansion or to increase yields. Attached is a letter

dated June 10, 2011 from the City to David Giachini of NC-DENR's Public Water Supply Section explaining the engineering costs on this project, dating back 2006.

Contrary to the comments in the Site Visit Report, we are of the understanding that NCDENR officials do agree that all engineering costs submitted for this project are legitimate, reimbursable costs.

OIG Response: Based upon our exit conference and review of the supplemental documentation provided, we agree that the engineering costs incurred for rehabilitating existing wells and exploring well number 12's viability were necessary to make the Recovery Act-funded well field project shovel-ready. We adjusted the report accordingly.

I trust that the information submitted in this letter will provide enough background so that the final 'Site Visit Report' will not have any significant findings contrary to the fact that the Elizabeth City Well Field Expansion Project was in full compliance with the requirements of the Presidents 'Recovery and Reinvestment Act'.

Sincerely,

Richard C. Olson
City Manager
City of Elizabeth City

cc: Jessica G. Miles
Public Water Supply Section Chief
North Carolina Department of Environmental and Natural Resources

Email copy: John Trefry {trefry.john@epa.gov}

EPA Region 4 Response to Draft Report

September 27, 2011

MEMORANDUM

SUBJECT: EPA Region 4 Response to Draft Audit Report:
American Recovery and Reinvestment Act Site Visit of the Elizabeth City Well
Field Expansion Project, Elizabeth City, North Carolina
Project No. OA-FY10-A-0203

FROM: Gwendolyn Keyes Fleming
Regional Administrator

TO: Shannon M. Schofield, CFE
Senior Auditor
EPA - Office of Inspector General

This is the response to the August 8, 2011, draft report issued by the Office of Inspector General on the American Recovery and Reinvestment Act (ARRA) Site Visit of the Elizabeth City Well Field Expansion Project Elizabeth City, North Carolina (the City). We reviewed the report issued by your office and compared your findings to the information available in the project file maintained by the State of North Carolina Drinking Water State Revolving Fund program and supplemental information provided by the borrower. Based on this information, we offer the following response to your draft findings:

1. Buy American Issues: The Environmental Protection Agency agrees that the information included in the draft report on the City was accurate in accordance with the Buy American provisions for two of the three items identified. Regarding the foreign made switchgear manufactured by Siemens, two options for corrective action were given to the City: replace the foreign made switchgear manufactured from Siemens using American made parts; or, if replacement of this item is unattainable, include the components of the switchgear in the de-minimis log for the project. With regard to the site lights and poles manufactured by Acuity, the City will add the items to the de-minimis log for the project. To date, the de-minimis items included in the log totaled \$8,894.41, which is about 2.2 percent of the total material cost for this project. Therefore, the addition of these items will not cause the City to exceed the five percent threshold established by the nationwide waiver of the Buy American requirements of ARRA.

The EPA has determined that the transformer identified in the draft report is not subject to the Buy American provisions. A review of the State's project files revealed that the transformer is not part of the project, was not included in the engineering plans and specifications and was not procured or installed by the contractor and/or subcontractors for this project. The transformer is owned by the City's electric distribution utility and

not the Water and Sewer Authority. The City provided documentation to support their claim that these are separate financial entities established under North Carolina law, NCGS 159-26. As such, we do not concur with the proposed recommendation to apply the Buy American requirements of ARRA to the utility transformer, as the purchasing, installation and operation of this piece of equipment resides within the City's electric distribution utility.

2. Other matters, Engineering Costs: The EPA does not concur with the proposed recommendation to recover the engineering costs associated with the planning phase of the project. The invoices and costs associated with the project were reviewed by the State and determined to be eligible expenses according to State procurement laws and regulations. Also, attached is a memo dated June 10, 2011, from Elizabeth City's Public Utilities Director to the State's project engineer which we believe sufficiently justifies the specific engineering costs associated with this project. Further, the project summary supports and justifies the costs associated with the tasks performed as part of the preliminary engineering work as contained in the invoices that the City received for the planning and design phase of the Well Expansion Project. EPA believes that this information provides sufficient documentation regarding the questioned engineering costs and proposes no further action.

If you or your staff has any further questions regarding this response, please contact James D. Giattina, Water Protection Division Director, at (404) 562-9345.

Attachments (3)

1. Status of Region 4 Recommendations
2. June 10, 2011 Letter to David Giachini
3. Site Visit Report

Distribution

Office of the Administrator
Regional Administrator, Region 4
Agency Follow-Up Official (the CFO)
Agency Follow-Up Coordinator
General Counsel
Assistant Administrator for Administration and Resources Management
Associate Administrator for Congressional and Intergovernmental Relations
Associate Administrator for External Affairs and Environmental Education
Director, Grants and Interagency Agreements Management Division
Audit Follow-Up Coordinator, Region 4
Public Affairs Officer, Region 4
Director, Water Protection Division, Region 4
Chief, Grants and SRF Management Section, Region 4
Section Chief, North Carolina Department of Environment and Natural Resources,
Public Water Supply Section
Team Leader, North Carolina Department of Environment and Natural Resources,
Public Water Supply Section, Loans and Grants Unit
City Manager, Elizabeth City, North Carolina
Public Utilities Director, Elizabeth City, North Carolina