



July 24, 2017

Albert Kelly  
Senior Advisor to the EPA Administrator  
EPA Superfund Task Force Chairman  
Office of the Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: Comment on Administrator's Memorandum: "Prioritizing the Superfund Program;"

Mr. Kelly:

The Superfund Workgroup of the American Council of Engineering Companies (ACEC) submitted comments dated July 14, 2017 on the Administrator's May 22, 2017 memorandum "Prioritizing the Superfund Program." We look forward to the report directed in the memorandum. In the meantime, we make one additional comment as follows:

- EPA's contracts and acquisition office is a key player on EPA's "Superfund Team." The performance of the acquisition management group can be a catalyst for, or a barrier to achieving the goal of improving the efficiency and effectiveness of the Superfund program. In order to realize the program improvements envisioned by the EPA Superfund Task Force, EPA's procurement and contract administration function needs to have adequate staff resources, with the training and experience to efficiently procure and implement contracts. If that function is understaffed, or doesn't have the appropriate experience and training to implement the next generation of Superfund contracts, targeted improvements under the strategies and approaches developed by the Task Force may be at risk.

We look forward to the Task Force report and future opportunities to discuss the points raised in this, and our July 14, 2017 letter.

Regards,

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