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National Secretary-Treasurer

Dr. Everett B. Kelley
National President

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November 12, 2021

Mr. Michael Regan
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Closure/Relocation of EPA Region 6 Laboratory in Houston, Texas

Dear Administrator Regan:

On behalf of the American Federation of Government Employees, AFL-CIO (AFGE), which represents over 700,000 federal and District of Columbia employees including 7,500 employees at the Environmental Protection Agency (EPA), we write to express our strong opposition to the Environmental Protection Agency (EPA)'s continued efforts to close and relocate the EPA Region 6 Laboratory ("Lab" hereinafter), a full-service analytical Lab which serves Arkansas, Louisiana, New Mexico, Oklahoma, and Texas. The closing of the Lab in Houston – the petrochemical corridor of the world, with its high concentration of chemical plants and refineries – is counterproductive to EPA's mission to protect human health and the environment.

We are concerned that this relocation will shrink the overall number of EPA employees needed to protect human health and the environment. The relocation runs counter to the Administration's commitment to serving environmental justice communities in the Gulf Coast area. Lab employees have been asked to relocate to Ada, Oklahoma, hundreds of miles away, no later than 2023. Although EPA Lab employees are dedicated public servants committed to the Agency's mission, most employees will choose to retire or resign due to the hardships that the relocation will impose on them.

The EPA Region 6 employees who will leave the Agency instead of relocating are highly trained, skilled analytical staff including chemists, biologists, environmental scientists, and facility support staff. The Lab's closure will bring the loss of decades of institutional knowledge, training, research, and expertise in critically needed fields including public health, environmental science, and emergency management. Houston will lose critical access to testing of air, water, and soil samples that require immediate analysis. This could require Houston to outsource Lab work to entities outside the federal government. (Federal government laboratories are impartial, apolitical, non-profit entities that carry out their agency's mission without outside interference.)

Recent laboratory relocations have run millions of dollars over budget. The Houston Lab is being moved from a newer facility built in 1990 to an older facility built in 1966 and extensive renovations will be needed for the Lab to be able to function. Furthermore, the Houston Lab will lose certain technological advantages if relocated to Ada.




The relocation will also require that additional space be acquired in Houston for the non-lab personnel currently housed at the Houston Lab (inspectors, emergency responders, air and water field scientists, public affairs, attorneys, criminal investigators, contractors, etc.) and the government vehicles and equipment they need to perform their duties. This will result in significant additional cost to the Agency and taxpayers.

We strongly urge you to reconsider the closure of the Houston, Texas Laboratory and the relocation of the facility and its employees to Ada, Oklahoma. We are concerned that if the move goes forward, the Regional Lab will be unable to carry out its mission for an indefinite period, possibly years.

Thank you for your prompt attention to this urgent matter.

Sincerely,


Everett B. Kelley
President