



U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

Compendium of Unimplemented Recommendations as of September 30, 2011

Report No. 12-N-0034

October 31, 2011

Abbreviations

BOSC	Board of Scientific Counselors
CA	Corrective Action
CWA	Clean Water Act
CWSRF	Clean Water State Revolving Fund
DWSRF	Drinking Water State Revolving Fund
EPA	U.S. Environmental Protection Agency
FOIA	Freedom of Information Act
HPV	High Priority Violation
LRP	Land Research Program
MATS	Management Audit Tracking System
NETI	National Enforcement Training Institute
OAR	Office of Air and Radiation
OARM	Office of Administration and Resources Management
OCFO	Office of the Chief Financial Officer
OCSP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Enforcement and Compliance Assurance
OEI	Office of Environmental Information
OIG	Office of Inspector General
OMB	Office of Management and Budget
ORD	Office of Research and Development
OSWER	Office of Solid Waste and Emergency Response
OW	Office of Water

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

THE INSPECTOR GENERAL

October 31, 2011

MEMORANDUM

SUBJECT: Compendium of Unimplemented Recommendations as of September 30, 2011
Report No. 12-N-0034

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 and title.

TO: Deputy Administrator
Assistant Administrators
Regional Administrators
General Counsel
Chief Financial Officer
Associate Administrators

Attached is the semiannual *Compendium of Unimplemented Recommendations as of September 30, 2011*, prepared by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This Compendium fulfills the requirement of the Inspector General Act of 1978, as amended, to identify reports containing significant recommendations described in previous semiannual reports to Congress on which corrective actions have not been completed. This report is a change from our previous reporting in that it now includes a section of significant recommendations with corrective actions that have future planned completion dates.

This Compendium, issued in conjunction with the *Semiannual Report to Congress, April 1, 2011–September 30, 2011*, and as a separate document to EPA leadership, is part of the OIG's follow-up strategy to promote robust internal controls. Follow-up is done in collaboration with the EPA Office of the Chief Financial Officer and EPA audit follow-up coordinators. The goal is to improve overall audit management by increasing EPA managers' awareness of outstanding agreed-to commitments for action on OIG-reported recommendations. Implementing these recommendations will correct weaknesses, reduce vulnerabilities to risk, and leverage opportunities for improved performance.

The significance of audit follow-up, as described by the Office of Management and Budget (OMB) Circular A-50, is enhanced by the public's expectation for greater transparency and a

heightened interest by Congress in realizing potential opportunities for improvement in the federal government. The OIG's previous Compendium reports appear to be increasing Agency awareness of, and action, on unimplemented OIG recommendations.

The unimplemented recommendations listed in this Compendium were selected based on their significance and their status in EPA's Management Audit Tracking System. In addition, some unimplemented recommendations were identified through review by the OIG.

According to OMB Circular A-50, audit follow-up is a shared responsibility between the Agency and the OIG. We will continue to identify unimplemented recommendations for attention and action, as well as remove the previously reported unimplemented recommendations when appropriate information of completion is provided. We hope that you find this tool useful in identifying ways to further improve Agency operations.

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Introduction

Purpose

Section 5(a) of the Inspector General Act of 1978, as amended, requires each Inspector General to issue semiannual reports to Congress and include “an identification of each significant recommendation described in previous semiannual reports on which corrective action has not been completed.” The Office of Inspector General (OIG) prepares the Compendium of Unimplemented Recommendations (Compendium) to satisfy this requirement. The Compendium highlights for U.S. Environmental Protection Agency (EPA) management those significant recommendations that have remained unimplemented past the date agreed upon by EPA and the OIG. It also provides a listing of all of the other significant recommendations with future completion dates. This Compendium is being issued in conjunction with the OIG Semiannual Report to Congress for the reporting period April 1, 2011, through September 30, 2011. The Compendium helps Agency management stay informed about EPA’s outstanding commitments, and its progress in taking agreed-upon corrective actions on OIG recommendations to improve programs and operations.

Background

Recommendations are issued by EPA’s OIG to improve the economy, efficiency, effectiveness, or integrity of EPA programs and operations. Office of Management and Budget (OMB) Circular A-50, *Audit Followup*, affirms that corrective action taken by management on resolved findings and recommendations is essential for improving the effectiveness and efficiency of government operations and that audit follow-up is a shared responsibility of agency management officials and auditors.

OMB Circular A-50 requires each agency to establish systems to ensure the prompt and proper resolution and implementation of audit recommendations. EPA Order 2750, based on OMB Circular A-50, details EPA’s policy and procedures on audit follow-up. The Chief Financial Officer is the Agency Audit Follow-Up Official and has responsibility for Agency-wide audit resolution and ensuring action officials implement corrective actions. EPA uses the Management Audit Tracking System (MATS) to track information on Agency implementation of OIG recommendations. The Office of the Chief Financial Officer maintains and operates MATS. Report data, such as the title, issue date, and recommendations, are downloaded into MATS from the Inspector General Enterprise Management System (IGEMS).

The Audit Management Official in the Office of the Administrator, the Office of General Counsel, and each Assistant Administrator’s or Regional Administrator’s office designates an Audit Follow-Up Coordinator for that office. Audit Follow-up Coordinators are responsible for quality assurance and analysis of data in the tracking system. When corrective actions in response to recommendations in an audit report are completed and certified, the Agency may inactivate that report’s MATS file, and it is no longer tracked by the Audit Follow-Up Coordinator. The Agency self certifies that corrective actions are completed. The Agency is also

responsible under the Inspector General Act for reporting on audit reports for which final corrective action has not been taken 1 year or more after the Agency's management decision.

This Compendium identifies 8 unimplemented recommendations from 7 reports, compared with 18 unimplemented recommendations from 12 reports identified for the period ending March 31, 2011. Of the 8 unimplemented recommendations reported in this Compendium, 1 was included in the previous Compendium and 7 are newly identified. We removed 17 unimplemented recommendations from 12 reports that were included in the previous Compendium. Removal of an unimplemented recommendation does not mean that it was verified as implemented but rather that it was reported as being completed or that the target completion date has been revised with OIG approval.

Scope and Methodology

Due to our limited scope and purpose, we did not conduct our work in accordance with all generally accepted government auditing standards issued by the Comptroller General of the United States. Specifically, we did not evaluate management controls, determine compliance with laws and regulations, or develop findings and recommendations. Further, we did not thoroughly assess the validity and reliability of data obtained from the Agency's MATS, which is used by EPA to track audit follow-up information. Although MATS was our primary source for identifying unimplemented recommendations, we did perform additional steps to search for unimplemented recommendations that may not have been identified in MATS.

We reviewed selected audit and evaluation reports issued by the EPA OIG from October 1, 1997, through March 31, 2011, to identify significant unimplemented recommendations for inclusion in the Compendium. However, we did not identify any significant unimplemented recommendations from fiscal years 1998, 1999, 2000, 2003, and 2004. We did not review recommendations from reports without an OIG agreement on the Agency's corrective action plan (Management Decision). A list of the reports without a Management Decision can be found in Appendix 2 of the OIG Semiannual Report to Congress.

We limited the consideration of unimplemented recommendations to those we believe were significant because they could have a material impact on the economy, efficiency, effectiveness, or integrity of EPA programs and operations. For this purpose, we define significant recommendations in the following terms:

- **Economy:** Opportunity to save, prevent loss, or recover at least \$500,000 in monetary costs or value.
- **Efficiency:** Improvement in the process, capacity, accessibility, or delivery of program objectives and the elimination of unnecessary or unproductive actions or expenses.
- **Effectiveness:** Improvement in the quality of, or reduction in the risk to, public health and the environment.
- **Integrity:** Improvement in operational accountability, enforcement of and compliance with laws and regulations, and security of resources for public confidence.

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The following EPA offices have unimplemented recommendations listed in this Compendium:

Office of Administration and Resources Management (OARM)
Office of Enforcement and Compliance Assurance (OECA)
Office of Research and Development (ORD)
Office of Water (OW)
Region 3

The following EPA offices have recommendations with future completion dates in this Compendium:

Office of Administration and Resources Management (OARM)
Office of Air and Radiation (OAR)
Office of Chemical Safety and Pollution Prevention (OCSPP)
Office of Enforcement and Compliance Assurance (OECA)
Office of Environmental Information (OEI)
Office of Research and Development (ORD)
Office of Solid Waste and Emergency Response (OSWER)
Office of the Chief Financial Officer (OCFO)
Office of Water (OW)
Region 2
Region 3
Region 7
Region 9
Region 10

We anticipate that the Agency will provide updates in MATS on the status of each unimplemented recommendation, including a description of progress and an explanation of the delay in completing an agreed-to action.

Unimplemented Recommendations With Past Due Completion Dates

Action Office: OW
Report Title: EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
Report No.: 10-R-0057
Date Issued: 02/01/2010

Report Summary

EPA has not provided clear and comprehensive guidance to states on how to determine the eligibility of green reserve projects. EPA was promoting a green approach to wastewater and drinking water programs for at least a year prior to enactment of the American Recovery and Reinvestment Act of 2009 (Recovery Act). Despite that experience, EPA did not develop and issue clear and comprehensive guidance in time to meet many of the states' needs. For example, EPA did not provide guidance on how to solicit and select green projects until after many states had finished doing so. Some states felt the need to resolicit for green projects while others did not.

EPA's guidance and subsequent updates have not addressed important aspects of project selection. At the time of this review, EPA had not established water and energy efficiency threshold ranges for many types of green projects. In addition, the Agency still had not provided sufficient information to states on how to develop business case justifications for noncategorical projects. Moreover, changes over time in EPA's guidance for how to determine project eligibility resulted in EPA regions applying different standards for approving states' green project proposals.

EPA cannot provide reasonable assurance that its green reserve projects will meet the objectives of Congress without issuing guidance that sets definitive expectations. Additionally, future green funding may face similar issues.

Unimplemented Recommendation

Recommendation 2: We recommend that the Assistant Administrator for Water conduct a timely review of the states' submitted green projects and, where necessary, accompanying business cases, in accordance with the pertinent statutory provisions and EPA guidance, information, and criteria.

Status: OW indicated that it completed a series of checklists for the regions to use in conducting oversight visits to ensure that the reviews were complete, well documented, and consistent. OW agreed that regions would conduct regular state oversight reviews. The first two state reviews were to be completed by December 2010. At a minimum, regions were to conduct one project site visit per program during this same period. Additionally, oversight visits to the regional offices by national program teams for both the Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) were to be completed. The DWSRF visit was to be completed by October 2010, and the CWSRF by December 2010. These corrective actions are past due for completion.

Action Office: ORD
Report Title: Lack of Final Guidance on Vapor Intrusion Impedes Efforts to Address Indoor Air Risks
Report No.: 10-P-0042
Date Issued: 12/14/2009

Report Summary

The purpose of our review was to determine what actions the EPA has taken to identify and mitigate human health risks from chemical vapor intrusion that can be associated with contaminated sites. We addressed the following questions:

1. What steps has EPA taken to identify the potential risks of vapor intrusion from contaminated sites?
2. What actions has EPA taken to ensure that vapor intrusion is being site-specifically identified and addressed within in its various programs, including Resource Conservation and Recovery Act, Superfund, Brownfields, and Underground Storage Tanks? Where EPA has not taken actions to site-specifically identify and address vapor intrusion, why not?

The report was issued to OSWER and ORD. However, OSWER did not have any past due recommendations for this report.

Unimplemented Recommendation

Recommendation 4: We recommend that the Assistant Administrator for Research and Development finalize toxicity values for Trichloroethylene and Perchloroethylene in the Integrated Risk Information System database.

Status: EPA will finalize the toxicological reviews for Trichloroethylene and update the Integrated Risk Information System database with this information. The agreed to completion date was September 30, 2011.

Action Office: OECA
Report Title: EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act
Report No.: 10-P-0009
Date Issued: 10/26/2009

Report Summary

EPA lacks a systematic framework for identifying the violations of §404 of the Clean Water Act (CWA) for which it is responsible under a 1989 Memorandum of Agreement. Primarily because of its limited field presence related to §404 violations, EPA identifies violations through a passive, reactive method of relying on complaints and referrals from external sources. An incomplete national data system and sporadic coordination with federal and State partners further impair EPA's ability to maintain an effective §404 enforcement program.

EPA must develop a framework that includes a §404 enforcement strategy that has such elements as: increased communication/coordination with enforcement partners, a system to track repeat and flagrant violators, performance measures, and cross-training. Without an effective framework or strategy, EPA cannot be assured that it is sufficiently protecting wetlands and other surface waters from §404 violations involving dredged or fill activity. Further, the current system does not provide EPA with the necessary inputs to make informed decisions about the allocation of resources for §404 enforcement.

Unimplemented Recommendation

Recommendation 2-1: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance develop and implement a comprehensive CWA § 404 enforcement strategy.

Status: In developing the strategy, EPA stated it would comprehensively evaluate the enforcement program, including each of the elements identified by corrective action, to create a more systematic, nationally consistent, and effective EPA enforcement program. OECA indicated that it released the draft § 404 enforcement strategy for review and comment, requesting regional comments no later than November 30, 2010. OECA indicated that the draft final would be completed by January 2011, and self-granted a 30-day extension to February 2011. This corrective action is past due for completion.¹

¹ Subsequent to the close of our review on October 7, 2011, OECA informed the OIG that it issued a memo to the Regional Administrators on April 21, 2011, which provided the draft final CWA § 404 Enforcement Strategy. In the memo, the Regional Administrators were directed to implement the strategy and continue the "Pilot" through February 2012.

Action Office: OARM
Report Title: Review of Hotline Complaint on Employee Granted Full-Time Work-at-Home Privilege
Report No.: 10-P-0002
Date Issued: 10/07/2009

Report Summary

We found an unauthorized, full-time work-at-home arrangement that has existed for 9 years and allows a National Enforcement Training Institute (NETI) employee to work from home in Ohio instead of an office in Washington, DC. The employee and position were originally located in the Washington area and the employee later moved as the result of a spouse transfer. In our opinion, NETI's actions are for the benefit of a single employee as opposed to being primarily in the interest of the government, and this action was not equitably provided within NETI. EPA has no established or consistent policy, procedure, or criteria for granting full-time work-at-home privilege, and appears to be preferentially available to only a few employees. Neither OARM nor NETI has any written documentation showing the government interest in or appropriateness of making this arrangement, or that senior OARM officials approved this action.

Office of Human Resources personnel (the Associate Deputy Director of Program Management & Communications, and the Agency Telework Coordinator) stated that EPA became aware of similar arrangements due to research it performed for an unrelated court case. OARM raised concerns about equity in such arrangements, and believes this must be brought under control. To date, OARM has not corrected this situation.

Unimplemented Recommendations

Recommendations 1 and 2a: We recommend that the Deputy Administrator assign responsibility for authorizing all non-OARM duty station changes to the Assistant Administrator for OARM. We further recommend that the Assistant Administrator for OARM establish and implement Agency policy for all EPA employees that clearly articulates the process and procedures for changing an employee's duty station to a location geographically separate from the position of record.

Status: OARM has been working to address the official worksite designation issue for situations where employees' are assigned to geographically separate locations. As OARM anticipated, it has taken time to build the considerable cross program and regional support that it believes is needed to effectively implement the new draft policy. As of March 11, 2011, OARM had planned to complete the following steps toward the development of the final policy. These corrective actions, which are past due, are associated with the recommendations above:

- March 15-22, 2011 – The draft policy will be shared with OARM's new Principal Deputy Assistant Administrator.
- March 22, 2011-April 5, 2011 – The draft policy will undergo the Agency's Directives Clearance Review process – Review and Comment.
- April 5-19, 2011 – The draft policy will undergo the Agency's Directives Clearance Review process – Comment Resolution.

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- April 19-June 17, 2011 – The draft policy will undergo union notification and bargaining, consistent with EPA’s collective bargaining unit agreements.
- June 20, 2011 – This is the target date for the completion of the final policy.²

² Subsequent to the close of our review on October 7, 2011, OARM informed the OIG that it continues to aggressively coordinate across the Agency’s program and regional offices to develop and finalize the telework policy which formalizes procedures for changing an employee’s duty station to a location geographically separate from the position of record. Completion of the final telework policy is expected by December 31, 2012. This includes a directive clearance review process expected completion date of July 30, 2012, and a union notification and review process expected completion date of September 30, 2012.

Action Office: OW
Report Title: EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality Standards
Report No.: 09-P-0223
Date Issued: 08/26/2009

Report Summary

We determined that EPA's 1998 National Strategy and Plan to promote state adoption of nutrient water quality standards (which better protect aquatic life and human health) have been ineffective. In 1998, EPA stated that a critical need existed for improved water quality standards, given the number of waters that were impaired from nutrients. In the 11 years since EPA issued its strategy, half the states still had no numeric nutrient standards. States have not been motivated to create these standards because implementing them is costly and often unpopular with various constituencies. EPA has not held the states accountable to committed milestones. The current approach does not assure that states will develop standards that provide adequate protection for downstream waters. Until recently, EPA has not used its CWA authority to promulgate water quality standards for states.

EPA cannot rely on the states alone to ensure that numeric nutrient standards are established. EPA should prioritize states/waters significantly impacted by excess nutrients and determine whether it should set the standards. EPA also needs to establish effective monitoring and measures so that accurate program progress is reported. This will assist EPA management in program decision-making.

Unimplemented Recommendation

Recommendation 2-1: We recommend that the Assistant Administrator for Water select significant waters of national value which need numeric nutrient water quality standards to meet the requirements of the CWA.

Status: OW planned to revisit the list of highest priority states and waters developed in May 2010 and update the list based on state progress. It would assess the availability of resources and determine the number of new evaluations and possible CWA Section 303(c) determinations that can be funded. OW plans to have this action complete by November 2011, but the agreed-to planned completion date was May 2011.

Action Office: OARM
Report Title: EPA Plans for Managing Counter Terrorism/Emergency Response Equipment and Protecting Critical Assets Not Fully Implemented
Report No.: 09-P-0087
Date Issued: 01/27/2009

Report Summary

On April 26, 2006, we issued an audit report, *EPA Needs to Better Implement Plan for Protecting Critical Infrastructure and Key Resources Used to Respond to Terrorist Attacks and Disasters*. It contained findings and recommendations for improving implementation of the initiatives in EPA's Critical Infrastructure and Key Resources Protection Plan and managing its Counter Terrorism/Emergency Response equipment. A follow-up audit was warranted, given the nature and importance of the prior report recommendations. We conducted this audit to determine whether EPA effectively implemented corrective actions to address findings and recommendations in our previous report. The report was issued to OAR, OARM, OSWER, and OCFO. However, OAR, OSWER, and OCFO have no past-due corrective actions recorded in MATS.

Unimplemented Recommendation

Recommendation 4-1(b): We recommend that the Assistant Administrators for Solid Waste and Emergency Response and for Air and Radiation, in conjunction with the Office of the Chief Financial Officer, review the information in MATS for the prior audit and ensure it is accurate, current, and complete for the remaining corrective actions to upgrade facility and hardware to analytical lab in Las Vegas.

Status: The completion of the Office of Radiation and Indoor Air's Radiation and Indoor Environments laboratory in Las Vegas has been placed on hold. This is due to a longer-range effort to construct a combined facility for all EPA programs in Las Vegas, including ORD's and the Office of Radiation and Indoor Air's laboratories. The Facilities Management and Services Division within OARM's Office of Administration has responsibility for the completion of this action. After December 2011, OARM will have a better idea in terms of funding for such a facility. OARM's planned milestone date for the completion of construction on the new lab is April 30, 2013. The original agreed-to completion was June 2011.

Action Office: Region 3
Report Title: Development Growth Outpacing Progress in Watershed Efforts to Restore the Chesapeake Bay
Report No.: 2007-P-00031
Date Issued: 09/10/2007

Report Summary

EPA and its Chesapeake Bay watershed partners will not meet load reduction goals for developed lands by 2010 as established in the *Chesapeake 2000* Agreement. In fact, new development is increasing nutrient and sediment loads at rates faster than restoration efforts are reducing them. Developed lands contribute less than one-third of the bay loads but would require about two-thirds of the overall estimated restoration costs. Consequently, EPA and its bay partners focused on more cost-effective approaches, such as upgrading wastewater facilities and implementing agricultural best practices. Additional challenges impeding progress include:

- Lack of community-level loading caps.
- Shortage of up-to-date information on development patterns.
- Ineffective use of regulatory program to achieve reductions.
- Limited information and guidance on planning and applying environmentally sensitive development practices.
- Limited funding available for costly practices.

A cost-effective start to reversing the trend of increasing loads from developed land is for communities to concentrate on new development. Opportunities abound for EPA to show greater leadership in identifying practices that result in no-net increases in nutrient and sediment loads from new development and assisting communities in implementing these practices. If communities do not sufficiently address runoff from new development, loads from developed lands will continue to increase rather than diminish. As a result, restoration costs will increase, and the bay will not be restored to the health envisioned in the *Chesapeake 2000* Agreement because water quality degradation and loss of aquatic life will continue.

Unimplemented Recommendation

Recommendation 1: We recommend that the Regional Administrator, Region 3, charge the Chesapeake Bay Program Office Director to prepare and implement a strategy that demonstrates leadership in reversing the trend of increasing nutrient and sediment loads from developed and developing lands.

Status: Region 3 planned to issue an annual report on progress toward reducing nutrient and sediment loads from developed and developing lands, starting in September 2009. The OIG agreed to an extension, and the first annual report was issued by April 30, 2010, and the second annual report was to be issued April 30, 2011. The date for the second annual report was extended to August 31, 2011. This corrective action is now past due for completion.

Recommendations With Future Planned Completion Dates

Action Office: Region 3
Report Title: Observed Conditions at Five Deleted Superfund Sites
Report No.: 11-P-0433
Date Issued: 08/03/2011

Recommendation

Recommendation 2: We recommend that the Director, Hazardous Site Cleanup Division, EPA Region 3, instruct the Associate Director, Office of Superfund Site Remediation, EPA Region 3, to assess whether any additional action is warranted for the Middletown Road Dump and Matthews Electroplating sites.

Planned Completion Date: October 31, 2011

Action Office: OCFO
Report Title: EPA Needs to Reexamine How It Defines Its Payment Recapture Audit Program
Report No.: 11-P-0362
Date Issued: 07/19/2011

Recommendation

Recommendation 1: We recommend that the Chief Financial Officer report the results of all activities, including audits the OIG and other audit organizations conduct, when reporting on its payment recapture audit program in 2011.

Planned Completion Date: November 15, 2011

Action Office: ORD
Report Title: Office of Research and Development Needs to Improve Its Method of Measuring Administrative Savings
Report No.: 11-P-0333
Date Issued: 07/14/2011

Recommendation

Recommendation 1: We recommend that the Assistant Administrator for Research and Development establish a more timely and accurate system to measure its effective use of resources and to allow ORD to better manage its initiatives to reduce administrative costs.

Planned Completion Date (Corrective Action (CA) 1): December 31, 2011

Planned Completion Date (CA 2): December 31, 2015

Action Office: Region 2
Report Title: American Recovery and Reinvestment Act Site Visit of La Plata Water Treatment Plant Phase II Project, Aibonito, Puerto Rico
Report No.: 11-R-0232
Date Issued: 05/23/2011

Recommendation

Recommendation 4: We recommend that the Regional Administrator, Region 2, review Puerto Rico Aqueduct and Sewer Authority's reconciliation and verification in response to recommendations 1 and 2 and take the appropriate actions to ensure compliance with Sections 1512 and 1606 of the Recovery Act.

Planned Completion Date: October 31, 2011

Action Office: ORD
Report Title: EPA's Small Business Innovative Research Awards Should Include Additional Certifications to Reduce Risk
Report No.: 11-N-0199
Date Issued: 03/30/2011

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for the Office of Research and Development add the certification statement provided in appendix A (Certification for Use with Proposal Submissions) to the current requirements that Small Business Innovative Research funding applicants must submit prior to award.

Planned Completion Date: March 31, 2012

Recommendation 2: We recommend that the Assistant Administrator for Research and Development require Small Business Innovative Research funding recipients to submit the certification statement provided in appendix B (Certification for Final Reports) with their final reports.

Planned Completion Date: August 31, 2012

Action Office: OARM and OAR
Report Title: EPA Needs to Better Document Project Delays for Recovery Act Diesel Emissions Reduction Act Grants
Report No.: 11-R-0179
Date Issued: 03/28/2011

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Administration and Resources Management revise the baseline monitoring report questions and corresponding guidance so that the project officers and grant specialists understand what information is required and how EPA uses the reports to monitor progress.

Planned Completion Date: December 31, 2011

Recommendation 3: We recommend that the Assistant Administrator for Air and Radiation continuously document delays in baseline and advanced monitoring reports for Recovery Act Diesel Emission Reduction Act grants. Update milestones and institute corrective action plans when delays occur.

Planned Completion Date: March 31, 2011

Recommendation 5: We recommend that the Assistant Administrator for Air and Radiation use the information in the recipient monitoring database and regularly provide reports to management on progress of projects, and status of corrective action plans, until the Recovery Act grants are completed.

Planned Completion Date: December 31, 2011

Action Office: OSWER
Report Title: EPA Promoted the Use of Coal Ash Products with Incomplete Risk Information
Report No.: 11-P-0173
Date Issued: 3/23/2011

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Solid Waste and Emergency Response define and implement risk evaluation practices to determine the safety of the coal combustion residual beneficial uses EPA promotes.

Planned Completion Date: April 30, 2014

Recommendation 2: We recommend that the Assistant Administrator for Solid Waste and Emergency Response determine if further EPA action is warranted to address historical coal combustion residual structural fill applications, based on comments on the proposed rule and other information available to EPA.

Planned Completion Date: September 28, 2012

Action Office: OSWER
Report Title: EPA Needs an Agency-Wide Plan to Provide Tribal Solid Waste Management Capacity Assistance
Report No.: 11-P-0171
Date Issued: 03/21/2011

Recommendations

Recommendation 1: We recommend that the Deputy Administrator develop and implement an Agency-wide plan for providing consistent and effective tribal solid waste management capacity assistance that is within the scope of EPA's authority and responsibility.

Planned Completion Date: April 30, 2012

Recommendation 2: We recommend that the Deputy Administrator require that the Agency-specific plan include:

- (a) Descriptions of the roles and responsibilities for the EPA program offices and EPA regions conducting solid waste management capacity assistance activities in Indian country;
- (b) Identification of the Agency resources required for providing solid waste management assistance activities;
- (c) Performance measures, including both output and outcome measures, to track whether its assistance is consistent and effective in developing solid waste management capacity and reducing risks from open dumps in Indian country;
- (d) Internal controls to ensure consistent data collection and consistent provision of waste management capacity assistance to tribal clients nationwide;
- (e) A process to ensure coordination between EPA program offices and regions; and
- (f) A timeline specifying when the activities and outcomes outlined in the plan are expected to be accomplished.

Planned Completion Date: April 30, 2012

Action Office: OEI
Report Title: Improvements Needed in EPA's Network Traffic Management Practices
Report No.: 11-P-0159
Date Issued: 03/14/2011

Recommendations

Recommendation 1: We recommend that the Director, Office of Technology Operations and Planning, Office of Environmental Information, develop and implement firewall and intrusion detection system logging review policies that: a) include detailed procedures that outline how the logging reviews should be performed, and b) identify groups responsible for reviewing the logs.

Planned Completion Date: December 3, 2011

Recommendation 2: We recommend that the Director, Office of Technology Operations and Planning, Office of Environmental Information, develop and implement a network traffic analysis methodology that will be used to identify abnormal network traffic.

Planned Completion Date: December 3, 2011

Recommendation 3: We recommend that the Director, Office of Technology Operations and Planning, Office of Environmental Information, ensure that network traffic monitoring services used in the support of nonbusiness-hour network-traffic monitoring are defined and codified in applicable policies, procedures, contracts, and service-level agreements.

Planned Completion Date: December 3, 2011

Recommendation 4: We recommend that the Director, Office of Technology Operations and Planning, Office of Environmental Information, develop and implement policy and procedures that specify which OEI personnel are responsible for performing management oversight roles, reviewing contractor-generated reports on a regular basis, and maintaining documented evidence of this review.

Planned Completion Date: December 3, 2011

Recommendation 5: We recommend that the Director, Office of Technology Operations and Planning, Office of Environmental Information, develop and implement firewall and intrusion detection system logging review policies that include requirements for firewall and intrusion detection system monitoring reports to be provided by the contractor to the OEI personnel responsible for management oversight. These reports should contain:

- a. documentation of the contractor's decisions and the basis for those decisions, and
- b. firewall and intrusion detection system logging data.

Planned Completion Date: December 3, 2011

Action Office: OSWER
Report Title: EPA Must Implement Controls to Ensure Proper Investigations Are Conducted at Brownfields Sites
Report No.: 11-P-0107
Date Issued: 02/02/2011

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Solid Waste and Emergency Response establish EPA accountability for rule-compliant all appropriate inquiries reports that are funded by Brownfields Assessment grants, including American Recovery and Reinvestment Act-funded all appropriate inquiries reports.

Planned Completion Date (CA 4): October 31, 2011

Planned Completion Date (CA 5): September 30, 2012

Recommendation 2: We recommend that the Assistant Administrator for Solid Waste and Emergency Response develop a plan to review post-final-rule all appropriate inquiries reports to determine the reports' compliance with all appropriate inquiries documentation requirements.

Planned Completion Date: September 1, 2012

Action Office: Region 7
Report Title: Vapor Intrusion Health Risks at Bannister Federal Complex Not a Concern for Buildings 50 and 52, Unknown for Other Buildings
Report No.: 11-P-0048
Date Issued: 01/05/2011

Recommendation

Recommendation 2: We recommend that the Regional Administrator, Region 7, as part of continuing oversight work, assess the responsible agencies' efforts to fully evaluate the health risks from inhaling potentially contaminated air for all buildings over or within close proximity of contaminated ground water plumes at Bannister Federal Complex.

Planned Completion Date: April 15, 2012

Action Office: OCFO and OARM
Report Title: EPA Needs to Strengthen Internal Controls for Determining Workforce Levels
Report No.: 11-P-0031
Date Issued: 12/20/2010

Recommendations

Recommendation 2-1: We recommend that the Chief Financial Officer amend the Resource Management Directive 2520 and the annual planning and budget memoranda to require using workload analysis to help determine employment levels needed to accomplish Agency goals.

Planned Completion Date: September 30, 2012

Original Completion Date: February 29, 2012

Recommendation 2-2: We recommend that the Chief Financial Officer require the Agency to complete a workload analysis for all critical functions to coincide with developing the strategic plan.

Planned Completion Date (CA 2): October 31, 2011

Planned Completion Date (CA 3): November 30, 2011

Planned Completion Date (CA 4): February 29, 2012

Planned Completion Date (CA 5): March 31, 2012

Planned Completion Date (CA 6): April 30, 2012

Planned Completion Date (CA 7): June 30, 2012

Planned Completion Date (CA 8): September 30, 2012

Recommendation 3-1: We recommend that the Assistant Administrator for Administration and Resources Management amend its workforce planning guidance (in conjunction with Resource Management Directive 2520 and the annual planning and budget memoranda) to require that headquarters program offices and regions provide the number of positions for the current fiscal year in each mission critical occupation and the number projected to accomplish planned Agency goals.

Planned Completion Date: February 29, 2012

Recommendation 3-2: We recommend that the Assistant Administrator for Administration and Resources Management report the mission critical occupation data gathered in conjunction with Resource Management Directive 2520 and the Office of Budget's annual planning and budget memoranda, within the Human Capital Management Report.

Planned Completion Date: December 15, 2011, and annually thereafter

Recommendation 4-1: We recommend that the Assistant Administrator for Administration and Resources Management, upon development of the Agency's Strategic Plan, require Agency program and regional offices to provide local level workforce-planning data, including current year and potential shifts in the numbers of mission critical occupation positions needed to meet strategic goals.

Planned Completion Date: February 29, 2012

Recommendation 4-2: We recommend that the Assistant Administrator for Administration and Resources Management summarize the local-level workforce-planning data needed to achieve each EPA strategic goal.

Planned Completion Date: February 29, 2012

Recommendation 4-3: We recommend that the Assistant Administrator for Administration and Resources Management provide summarized local-level workforce-planning data, including data sorted by programmatic goal-level, to Office of Budget.

Planned Completion Date: February 29, 2012

Action Office: OCFO
Report Title: Improvements Needed in EPA's Efforts to Replace Its Core Financial System
Report No.: 11-P-0019
Date Issued: 11/29/2010

Recommendations

Recommendation 1: We recommend that the Chief Financial Officer develop and implement formal procedures for future projects to ensure that:

- a. the requirements document(s) and test plans are authorized by executive management (as a part of the definition phase's requirements subphase) prior to approving the system to move into the next phase of the lifecycle, and
- b. any subsequent changes to the requirements document(s) and/or test plans are authorized by executive management prior to making changes to the design of the system.

Planned Completion Date: January 31, 2012

Recommendation 2: We recommend that the Chief Financial Officer develop and implement formal procedures to ensure that the test plan associated with product acceptance testing or any other test includes criteria that define what constitutes pass or failure to ensure that management has a basis for making go/no-go decisions.

Planned Completion Date: January 31, 2012

Action Office: OSWER
Report Title: EPA's Terms and Conditions as Well as Process to Award Recovery Act Interagency Agreements Need Improvement
Report No.: 11-R-0016
Date Issued: 11/16/2010

Recommendation

Recommendation 3-2: We recommend that the Assistant Administrator for Solid Waste and Emergency Response use the program evaluation of construction contracts to provide transparency and aid in developing a contracting strategy that will allow the EPA regional offices to make informed decisions when determining the best value for delivering Superfund construction projects.

Planned Completion Date: October 31, 2011

Action Office: OARM
Report Title: Audit of EPA's Fiscal 2010 and 2009 Consolidated Financial Statements
Report No.: 11-1-0015
Date Issued: 11/15/2010

Recommendations

Recommendation 8: We recommend that the Assistant Administrator for Administration and Resources Management require the Director, Facilities Management and Services Division, to develop a management-level property management training course and require completion of the course by all EPA managers.

Planned Completion Date: November 15, 2011

Recommendation 9: We recommend that the Assistant Administrator for Administration and Resources Management require the Director, Facilities Management and Services Division, to adequately address and resolve the issue and determine why personal property items are missing.

Planned Completion Date (CA 1): October 15, 2011

Planned Completion Date (CA 6): May 30, 2012

Action Office: OAR
Report Title: ENERGY STAR Label Needs to Assure Superior Energy Conservation Performance
Report No.: 11-P-0010
Date Issued: 10/28/2010

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Air and Radiation develop a strategic vision and program design that assures that the ENERGY STAR label represents superior energy conservation performance.

Planned Completion Date (CA 2): October 31, 2012

Planned Completion Date (CA 3): December 31, 2012

Recommendation 2: We recommend that the Assistant Administrator for Air and Radiation develop a set of goals and valid and reliable measures that can accurately inform shareholders and the public of the benefits of the program.

Planned Completion Date (CA 1): December 31, 2012

Planned Completion Date (CA 2): June 30, 2012

Planned Completion Date (CA 3): December 31, 2012

Planned Completion Date (CA 4): December 31, 2012

Action Office: OW
Report Title: EPA Lacks Internal Controls to Prevent Misuse of Emergency Drinking Water Facilities
Report No.: 11-P-0001
Date Issued: 10/12/2010

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Water develop standard definitions for the five facility availability codes (permanent, seasonal, emergency, interim, and other).

Planned Completion Date: December 31, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Water develop standard operating procedures that follow EPA reporting requirements to assist the States with entering data into the Safe Drinking Water Information System/State databases.

Planned Completion Date: December 31, 2011

Recommendation 2-3: We recommend that the Assistant Administrator for Water review the additional information included in State drinking water databases and, if appropriate, add fields to Safe Drinking Water Information System/Federal to improve the oversight of emergency facilities.

Planned Completion Date: December 31, 2011

Recommendation 2-4: We recommend that the Assistant Administrator for Water develop standard definitions for the five facility availability codes (permanent, seasonal, emergency, interim, and other).

Planned Completion Date: December 31, 2011

Action Office: OECA
Report Title: ECHO Data Quality Audit - Phase II Results: EPA Could Achieve Data Quality Rate with Additional Improvements
Report No.: 10-P-0230
Date Issued: 09/22/2010

Recommendations

Recommendation 1: We recommend that the Director of Compliance in the Office of Enforcement and Compliance Assurance establish a management control structure to facilitate Permit Compliance System to Integrated Compliance Information System – National Pollutant Discharge Elimination System conversion. The management control structure should support plans to meet milestone dates.

Planned Completion Date: September 30, 2013

Recommendation 5: We recommend that the Director of Compliance complete new rules that require states to report minor facility data.

Planned Completion Date: September 30, 2012

Recommendation 7: We recommend that the Director of Compliance conduct a review of the procedures used to test Integrated Compliance Information System–National Pollutant Discharge Elimination System programming code before it is placed into production.

Planned Completion Date: March 31, 2013

Action Office: ORD
Report Title: EPA's Office of Research and Development Performance Measures Need Improvement
Report No.: 10-P-0176
Date Issued: 08/04/2010

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Research and Development develop one or more measures linked to the short-term outcomes identified in the Land Research Program (LRP) multiyear plan.

Planned Completion Date: December 31, 2011

Original Completion Date: January 31, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Research and Development augment the LRP's citation analysis measures (Program Assessment Rating Tool measures 1 and 2) with measures that are meaningful to ORD program managers, and that are linked specifically to the LRP's goals and objectives.

Planned Completion Date: December 31, 2011

Original Completion Date: January 31, 2011

Recommendation 2-3: We recommend that the Assistant Administrator for Research and Development develop an implementation plan for the LRP client survey to:

- Identify the universe of LRP clients,
- Randomly select an appropriate target population,
- Conduct a representative survey of LRP clients, and
- Obtain a statistically valid response rate.

If ORD decides not to use the client survey tool, then ORD should develop a reliable alternative mechanism for collecting customer feedback along with an implementation plan for the alternative mechanism.

Planned Completion Date: March 30, 2012

Original Completion Date: February 28, 2011

Recommendation 2-4: We recommend that the Assistant Administrator for Research and Development provide Board of Scientific Counselors (BOSC) with the following performance measurement data prior to full program reviews: (1) the results of the most recent client survey (or its alternative mechanism for collecting client feedback), (2) data sufficient to assess LRP's progress towards achieving program goals and outcomes, and (3) other data needed to support each of BOSC's peer review charge questions.

Planned Completion Date: No date provided

Recommendation 2-5: We recommend that the Assistant Administrator for Research and Development require that BOSC program review reports include an explicit discussion of the reliability and suitability of the performance data that ORD provided to BOSC for each charge question and factor considered.

Planned Completion Date: August 31, 2012

Original Completion Date: June 30, 2011

Recommendation 2-6: We recommend that the Assistant Administrator for Research and Development revise ORD's guidance to BOSC for long-term goal ratings to ensure that all aspects of the summary assessment charge questions are clearly linked to the qualitative ratings definitions.

Planned Completion Date: August 31, 2012

Recommendation 2-7: We recommend that the Assistant Administrator for Research and Development supplement the current general long-term goal ratings definitions with program-specific milestones, and benchmarks for success, that are linked to elements in the long-term goal ratings definitions.

Planned Completion Date: August 31, 2012

Action Office: OAR
Report Title: Key Activities in EPA's Integrated Urban Air Toxics Strategy Remain Unimplemented
Report No.: 10-P-0154
Date Issued: 06/23/2010

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Air and Radiation:

- a. Disclose the current status and progress made in meeting Section 112(k) of the Clean Air Act.
- b. Identify the urban areas that continue to experience high or unacceptable health risks from cancer and noncancer effects, and how EPA plans to reduce risks in these areas.
- c. Address the major factors that have hindered implementation of the Integrated Urban Air Toxics Strategy, and how EPA plans to address these factors.
- d. Provide details on how the Agency intends to meet the Clean Air Act Section 112(k) requirement that at least 10 percent of Section 112 funds to go to state or local agencies to support strategies to address air toxics emissions from area sources.
- e. Disclose air toxics requirements that the Agency is unable to meet through its current authorities.

Planned Completion Date: December 16, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Air and Radiation determine how the Agency will measure progress in meeting the goals of the strategy. If the Assistant Administrator determines that the development and maintenance of a 1990 or similar baseline is not cost effective, EPA should develop and inform Congress of the Agency's alternative measures for assessing its progress in meeting the intent of the statutory goals.

Planned Completion Date: December 16, 2011

Action Office: OEI
Report Title: Improvements Needed in Key EPA Information System Security Practices
Report No.: 10-P-0146
Date Issued: 06/15/2010

Recommendations

Recommendation 3: On behalf of the OIG, Williams, Adley & Company, LLP, recommends the Director, Office of Technology Operations and Planning, Office of Environmental Information, enhance the quality assurance process to verify that:

- a. Required security controls are evaluated annually as part of the Federal Information Security Management Act self-assessment;
- b. Security control evaluations are independent and testing results include a documented strategy to resolve all weaknesses;
- c. Documentation of security controls testing is complete and adequately supports the objectives;
- d. Testing plans and procedures address the cause for testing failures; and
- e. National Institute of Standards and Technology and EPA requirements for security planning, assigning security responsibilities, and maintaining Certification and Accreditation documents (agency and contractor) are being followed.

Planned Completion Date (CA 4): March 30, 2012

Original Completion Date (CA 4): April 30, 2011

Planned Completion Date (CA 5): November 30, 2011

Recommendation 6: On behalf of the OIG, Williams, Adley & Company, LLP, recommends the Director, Office of Technology Operations and Planning, develop an inventory of systems that require contingency plans and maintain the status of updates, test dates, testing results, and resolution required.

Planned Completion Date: March 30, 2012

Action Office: OSWER
Report Title: EPA Should Improve Its Oversight of Federal Agency Superfund Reviews
Report No.: 10-P-0133
Date Issued: 06/02/2010

Recommendation

Recommendation 2-2: We recommend the Assistant Administrator for Solid Waste and Emergency Response implement policies and procedures to address Section 3.8 of EPA's 2001 Review Guidance, including (1) a summary for each review completed during the year; (2) an update of the status of operating units from sites designated as not protective or protectiveness deferred, in reviews from prior years; and (3) the status of follow-up actions identified in reviews from prior years. To the extent that this can be accomplished through the use of the Comprehensive Environmental Response, Compensation and Liability Information System, specific reports should be implemented and monitored.

Planned Completion Date: December 30, 2011

Action Office: Region 10
Report Title: Examination of Costs Claimed under EPA Grant XP98069201 Awarded to the City of Blackfoot, Idaho
Report No.: 10-4-0086
Date Issued: 03/29/2010

Recommendation

Recommendation 2: We recommend that the Regional Administrator, Region 10, designate the City of Blackfoot as a high-risk grantee in the Integrated Grants Management System. Also, require the following special conditions to be included for all future EPA awards to the grantee until the region determines that the grantee has met all applicable federal financial and procurement requirements:

- (a) Payment on a reimbursement basis.
- (b) Review and approval by the EPA project officer of reimbursement requests including all supporting documentation for the claims prior to payment.

Planned Completion Date: October 15, 2011

Action Office: OW
Report Title: EPA Needs Procedures to Address Delayed Earmark Projects
Report No.: 10-P-0081
Date Issued: 03/22/2010

Recommendation

Recommendation 1-3: We recommend that the Assistant Administrator for Water, in consultation with the Chief Financial Officer, establish a national policy that creates a response framework for dealing with unobligated earmarks. The framework should include criteria for when to escalate the handling of unobligated earmarks; establish a national policy that clearly identifies corrective actions for delayed projects; and create an exception reporting procedure for delayed projects to focus management attention on such cases.

Planned Completion Date (CA 6): October 30, 2011

Planned Completion Date (CA 7): October 30, 2012

Action Office: OECA and OCFO
Report Title: EPA Needs to Improve Its Recording and Reporting of Fines and Penalties
Report No.: 10-P-0077
Date Issued: 03/09/2010

Recommendations

Recommendation 4-2: We recommend that the Chief Financial Officer and the Assistant Administrator for Enforcement and Compliance Assurance work together to develop a common link between the Integrated Compliance and Information System and the Integrated Financial Management System to facilitate the reconciliation of the penalty-assessed amounts in the Integrated Compliance and Information System to the penalty-billed amounts in the Integrated Financial Management System.

Planned Completion Date: December 30, 2011
Original Completion Date: September 30, 2011

Recommendation 4-3: We recommend that the Chief Financial Officer and the Assistant Administrator for Enforcement and Compliance Assurance work together to perform an annual reconciliation of the penalty-assessed amounts in the Integrated Compliance and Information System to the penalty-billed amounts in the Integrated Financial Management System.

Planned Completion Date: December 30, 2011
Original Completion Date: September 30, 2011

Recommendation 5-1: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance disclose fines and penalties collected as well as assessed when reporting the amount and nature of fines and penalties based on enforcement actions. Since EPA does not collect all penalties in the year assessed, reporting total assessments and collections for a combined group of years may be a reasonable approach to disclosure.

Planned Completion Date: December 31, 2011

Action Office: OCSP
Report Title: EPA Needs a Coordinated Plan to Oversee Its Toxic Substances Control Act Responsibilities
Report No.: 10-P-0066
Date Issued: 02/17/2010

Recommendations

Recommendation 2-4: We recommend that the Assistant Administrator for Chemical Safety and Pollution Prevention³ establish criteria and procedures outlining what chemicals or classes of chemicals will undergo risk assessments for low-level and cumulative exposure. Periodically update and revise risk assessment tools and models with latest research and technology developments.

Planned Completion Dates (CA 2): December 31, 2012

Planned Completion Dates (CA 3): February 28, 2013

Recommendation 2-5: We recommend that the Assistant Administrator for Chemical Safety and Pollution Prevention develop a more detailed Toxic Substances Control Act Confidential Business Information classification guide that provides criteria for approving Confidential Business Information coverage and establishes a time limit for all Confidential Business Information requests to allow for eventual public access to health and safety data for chemicals.

Planned Completion Date (CA 4): January 31, 2012

³ The Office of Chemical Safety and Pollution Prevention was formerly known as the Office of Prevention, Pesticides and Toxic Substances.

Action Office: OEI
Report Title: Self-reported Data Unreliable for Assessing EPA's Computer Security Program
Report No.: 10-P-0058
Date Issued: 02/02/2010

Recommendation

Recommendation 3-2: We recommend that the Assistant Administrator for Environmental Information implement a process to verify that Agency security plans incorporate all the minimum required system security controls as prescribed by the National Institute of Standards and Technology. This process should include establishing a target date by which the Agency security plans will comply with the current National Institute of Standards and Technology guidance.

Planned Completion Date: November 11, 2011

Original Completion Date: May 23, 2011

Action Office: OW
Report Title: EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
Report No.: 10-R-0057
Date Issued: 02/01/2010

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Water develop and revise guidance, information, and, as appropriate, specific criteria that states can employ to assist them in identifying projects qualifying for funding from the states' green project reserve.

Planned Completion Date (CA 4): October 31, 2011

Planned Completion Date (CA 5): October 31, 2011

Recommendation 2: We recommend that the Assistant Administrator for Water conduct a timely review of the states' submitted green projects and, where necessary, accompanying business cases, in accordance with the pertinent statutory provisions and EPA guidance, information, and criteria.

Planned Completion Date (CA 3): December 31, 2011

Action Office: Region 3
Report Title: Changes in Conditions at Wildcat Landfill Superfund Site in Delaware
Call for Increased EPA Oversight
Report No.: 10-P-0055
Date Issued: 01/26/2010

Recommendations

Recommendation 2-1: We recommend that the Regional Administrator, Region 3, establish a sampling plan for the monitoring wells and surface waters that includes testing for total petroleum hydrocarbons.

Planned Completion Date: March 15, 2012
Original Completion Date: September 15, 2011

Recommendation 2-2: We recommend that if petroleum is found on the site above acceptable and appropriate levels, the Regional Administrator, Region 3, take action to address the contamination and amend existing site documents or generate new site documents, to ensure the site is protective of human health and the environment for current and planned land uses.

Planned Completion Date: July 31, 2012

Recommendation 2-3: We recommend that the Regional Administrator, Region 3, formally document oversight of the site owners' plans and agreements for use of the site. This includes an evaluation and determination of the impact of construction or vegetation change on the remedy, and what modifications to the remedy and/or Record of Decision will be needed to support unrestricted access to portions of the site.

Planned Completion Date: July 31, 2012
Original Completion Date: June 30, 2010

Recommendation 2-4: We recommend that the Regional Administrator, Region 3, change the sampling protocol to include dissolved (filtered) metals analysis. Continue to require that the reporting limits for all analyses are at or below the Department of Natural Resources and Environmental Control (Delaware) standard to ensure that all contamination above the standard is detected. Assess the effect of the sampling results on the protectiveness determination of the site.

Planned Completion Date: July 31, 2012

Action Office: Region 9
Report Title: Examination of Costs Claimed under EPA Grant X96906001 Awarded to Walker Lake Working Group, Hawthorne, Nevada
Report No.: 10-2-0054
Date Issued: 01/06/2010

Recommendations

Recommendation 2: We recommend that the Regional Administrator, Region 9, require the grantee to:

- a) Improve its procurement process to ensure compliance with Title 40 Code of Federal Regulations Part 30.
- b) Improve its internal controls to ensure that costs claimed meet documentation requirements and cost principles specified by Title 2 Code of Federal Regulations Part 230.
- c) Establish procedures to ensure that future Financial Status Reports are supported by accounting system data.

Planned Completion Date: April 30, 2012

Recommendation 3: We recommend that the Regional Administrator, Region 9, require that the following special conditions be included for the grant and future EPA awards to the grantee until the region determines that the grantee has met all applicable federal financial and procurement requirements:

- a) Payment on a reimbursement basis.
- b) Review and approval by the EPA project officer of reimbursement requests including all supporting documentation for the claims prior to payment.

Planned Completion Date: April 30, 2012

Action Office: OSWER
Report Title: Lack of Final Guidance on Vapor Intrusion Impedes Efforts to Address Indoor Air Risks
Report No.: 10-P-0042
Date Issued: 12/14/2009

Recommendations

Recommendation 2: We recommend the Assistant Administrator for Solid Waste and Emergency Response issue final vapor intrusion guidance(s) that incorporates information on:

- a. Updated toxicity values.
- b. A recommendation(s) to use multiple lines of evidence in evaluating and making decisions about risks from vapor intrusion.
- c. How risks from petroleum hydrocarbon vapors should be addressed.
- d. How the guidance applies to Superfund Five-Year Reviews.
- e. When or whether preemptive mitigation is appropriate.
- f. Operations and maintenance, the termination of the systems, and when institutional controls and deed restrictions are appropriate.

Planned Completion Date: November 15, 2012

Recommendation 3: We recommend the Assistant Administrator for Solid Waste and Emergency Response train EPA and state staff and managers and other parties on the newly updated, revised, and finalized guidance document(s).

Planned Completion Date: May 31, 2013

Action Office: OECA
Report Title: EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act
Report No.: 10-P-0009
Date Issued: 10/26/2009

Recommendation

Recommendation 2-1: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance, in consultation with the Assistant Administrator for Water, develop and implement a comprehensive CWA §404 enforcement strategy that should address, but not be limited to, the following areas:

- a. Creation of a national tracking system for complaints and referrals from the U.S. Army Corps of Engineers (Corps), as well as repeat and flagrant §404 violators;
- b. Improved communication and coordination between EPA headquarters/regions and Corps headquarters/districts;
- c. Barriers to enhanced interagency communication (and mechanisms to overcome these barriers) with the Corps, as well as other federal agencies (e.g., Natural Resources Conservation Service, U.S. Fish and Wildlife Service, and Civil Air Patrol);
- d. The feasibility of leveraging other CWA program resources to more systematically identify §404 violations;
- e. The adequacy of EPA's current performance measurement system for the §404 enforcement program; and
- f. Cross-training opportunities with federal, state, and other stakeholders.

Planned Completion Date (CA 3): February 29, 2012

Original Completion Date (CA3): October 31, 2011

Planned Completion Date (CA 5): March 30, 2012

Original Completion Date (CA 5): December 31, 2011

Action Office: OECA
Report Title: EPA Oversight and Policy for High Priority Violations of Clean Air Act
Need Improvement
Report No.: 10-P-0007
Date Issued: 10/14/2009

Recommendations

Recommendation 1: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance direct EPA regions to comply with the High Priority Violation (HPV) policy, and monitor and report on regions' compliance.

Planned Completion Date: October 1, 2012

Recommendation 2: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance:

- Revise the HPV policy to require specific oversight steps and remedies for HPVs that are unaddressed after 270 days, including taking over selected state HPV cases that have not been addressed in a timely manner, especially cases in states that have no administrative process.
- Include a section detailing the roles and responsibilities of EPA headquarters and regions, the states, and local agencies.

Planned Completion Date (CA 2): November 1, 2011

Original Completion Date (CA 2): September 1, 2011

Planned Completion Date (CA 3): September 30, 2012

Original Completion Date (CA 3): September 1, 2012

Recommendation 3: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance implement proper management controls over HPVs by (1) following the Watch List standard operating procedures, including generating trend reports and conducting national annual reviews; and (2) ensuring that Air Facility System data is accurate by documenting data inaccuracies and their disposition in regular meeting notes.

Planned Completion Date: October 1, 2012

Action Office: OARM
Report Title: Review of Hotline Complaint on Employee Granted Full-Time Work-at-Home Privilege
Report No.: 10-P-0002
Date Issued: 10/07/09

Recommendation

Recommendation 2b: We recommend that the Assistant Administrator for Administration and Resources Management identify and review all existing arrangements of full-time work-at-duty-station separate from the position of record, including the situation that was the subject of this review, and bring each of these arrangements into compliance with implemented EPA policy.

Planned Completion Date (CA2): December 20, 2011

Planned Completion Date (CA3): June 20, 2012

Action Office: ORD
Report Title: EPA Needs an Oversight Program for Protocol Gases
Report No.: 09-P-0235
Date Issued: 09/16/2009

Recommendation

Recommendation 2-3: We recommend that the Assistant Administrator for Research and Development update and maintain the EPA Traceability Protocol to meet the defined objectives of the Acid Rain, National Ambient Air Quality Standards, and other stationary source air programs.

Planned Completion Date: December 1, 2011

Action Office: OW
Report Title: EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality Standards
Report No.: 09-P-0223
Date Issued: 08/26/2009

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Water select significant waters of national value which need numeric nutrient water quality standards to meet the requirements of the CWA.

Planned Completion Date (CA 5): October 31, 2011

Planned Completion Date (CA 6): December 31, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Water set numeric nutrient water quality standards for the waters identified in Recommendation 2-1 to meet the requirements of the CWA.

Planned Completion Date: Not determined

Original Completion Date: September 30, 2011

Recommendation 2-5: We recommend that the Assistant Administrator for Water ensure that the regions annually validate Water Quality Standards Action Tracking Application data.

Planned Completion Date: December 31, 2012

Action Office: OECA
Report Title: EPA Needs to Improve Internal Controls to Increase Cost Recovery
Report No.: 09-P-0144
Date Issued: 04/27/2009

Recommendation

Recommendation 2-4: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance update potentially responsible party search guidance to reflect the mandatory requirements for potentially responsible party search documentation.

Planned Completion Date: November 30, 2011

Action Office: OEI
Report Title: EPA Has Improved Its Response to Freedom of Information Act Requests But Further Improvement Is Needed
Report No.: 09-P-0127
Date Issued: 03/25/2009

Recommendation

Recommendation 3-1: We recommend that the Assistant Administrator for Environmental Information mandate training for all Freedom of Information Act (FOIA) officers, coordinators, and individuals who have FOIA responsibilities. Specifically, we recommend that this training include or be supplemented by:

- Specific instructions to document all contacts with the requester;
- Direction to regional and program personnel to provide files in a timely manner when there is an appeal; and
- Instructions to all FOIA officers for completing the annual report, so that all of the EPA's FOIA officers can consistently and correctly report costs and personnel information.

Planned Completion Date: October 14, 2011

Action Office: OAR
Report Title: EPA Plans for Managing Counter Terrorism/Emergency Response Equipment and Protecting Critical Assets Not Fully Implemented
Report No.: 09-P-0087
Date Issued: 01/27/2009

Recommendation

Recommendation 2-5: We recommend that the Assistant Administrator for Air and Radiation, in conjunction with the Office of Administration and Resources Management, monitor the upgrade of the RadNet system against the planned schedule in the Critical Infrastructure and Key Resources Protection Plan until completed.

Planned Completion Date: September 30, 2012

Action Office: OSWER
Report Title: EPA Should Continue Efforts to Reduce Unliquidated Obligations in Brownfields Pilot Grants
Report No.: 08-P-0265
Date Issued: 09/16/2008

Recommendation

Recommendation 3: We recommend that the Assistant Administrator for Solid Waste and Emergency Response follow up to ensure that the regions deobligate the remaining funds for the 21 grants that have ended or are scheduled to end by September 30, 2008.

Planned Completion Date: December 31, 2011
Original Completion Date: September 30, 2011

Action Office: OAR
Report Title: Voluntary Greenhouse Gas Reduction Programs Have Limited Potential
Report No.: 08-P-00206
Date Issued: 07/23/2008

Recommendation

Recommendation 2-1: We recommend that the Principal Deputy Assistant Administrator for Air and Radiation review marginal abatement curve analyses annually and update as needed based on the availability of updated cost and abatement technology information to ensure that EPA and potential program participants have the most up-to-date abatement cost data for each industry sector.

Planned Completion Date (CA 4): November 15, 2011

Planned Completion Date (CA 5): March 15, 2012

Action Office: Region 9
Report Title: Making Better Use of Stringfellow Superfund Special Accounts
Report No.: 08-P-00196
Date Issued: 07/09/2008

Recommendation

Recommendation 2: We recommend that the Regional Administrator, Region 9, reclassify or transfer to the Hazardous Substance Superfund Trust Fund, as appropriate, up to \$27.8 million (plus any earned interest less oversight costs) of the Stringfellow special accounts in annual reviews, and at other milestones including the end of fiscal year 2010, when the record of decision is signed and the final settlement is achieved.

Planned Completion Date: December 31, 2012

Action Office: Region 2
Report Title: Limited Investigation Led to Missed Contamination at Ringwood Superfund Site
Report No.: 2007-P-00039
Date Issued: 09/25/2007

Recommendation

Recommendation 2: We recommend that the Regional Administrator, Region 2, direct the region's Emergency and Remedial Response Division to notify the Ringwood community of the initiation and results of any future 5-year reviews at the Ringwood site, consistent with EPA guidance.

Planned Completion Date: June 30, 2018

Original Completion Date: September 30, 2011

Action Office: OECA
Report Title: Overcoming Obstacles to Measuring Compliance: Practices in Selected Federal Agencies
Report No.: 2007-P-00027
Date Issued: 06/20/2007

Recommendation

Recommendation 2-2: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance coordinate with the in-house statistical expertise available in EPA's Office of Research and Development and Office of Environmental Information to help develop statistical models and evaluate external proposals.

Planned Completion Date (CA 3): November 30, 2011

Original Completion Date (CA 3): September 30, 2011

Planned Completion Date (CA 4): March 30, 2013

Original Completion Date (CA 4): December 31, 2012

Action Office: Region 2
Report Title: Environmental Justice Concerns and Communication Problems Complicated
Cleaning Up Ringwood Mines/Landfill Site
Report No.: 2007-P-00016
Date Issued: 04/02/2007

Recommendation

Recommendation 2-1: We recommend that the Regional Administrator, Region 2, address the Ringwood community's perception of unfair treatment and concerns regarding completely cleaning up the site by directing his staff to ensure that the new Record of Decision includes a detailed comparison of current and prior site investigations and cleanups.

Planned Completion Date: June 30, 2012

Original Completion Date: August 31, 2011

Action Office: OEI
Report Title: EPA Could Improve Controls over Mainframe Software
Report No.: 2007-P-00008
Date Issued: 01/29/2007

Recommendation

Recommendation 9: We recommend that the Director for the Office of Technology Operations and Planning, Office of Environmental Information, complete efforts to update the *Office of Environmental Information (OEI) Information Security Manual* and the *EPA Information Security Manual*. Subsequent to finalizing the changes, ensure the manuals are (1) reviewed timely by EPA management for adequacy, accuracy, and completeness; and (2) approved by EPA management in a timely manner.

Planned Completion Date (CA 2): November 30, 2011

Original Completion Date (CA 2): April 22, 2011

Planned Completion Date (CA 3): March 30, 2013

Original Completion Date (CA 3): March 30, 2012

Action Office: OSWER
Report Title: EPA Needs to Plan and Complete a Toxicity Assessment for the Libby Asbestos Cleanup
Report No.: 2007-P-00002
Date Issued: 12/05/2006

Recommendation

Recommendation 1: We recommend that EPA fund and execute a comprehensive amphibole asbestos toxicity assessment to determine (1) the effectiveness of the Libby removal actions, and (2) to determine whether more actions are necessary. The toxicity assessment should include the effects of asbestos exposure on children. The EPA Science Advisory Board should review the toxicity assessment and report to the Office of the Administrator and the Libby Community Advisory Group whether the proposed toxicity assessment can sufficiently protect human health.

Planned Completion Date (CA 1): September 30, 2012

Planned Completion Date (CA 2): September 30, 2015

Action Office: OSWER
Report Title: EPA Can Better Manage Superfund Resources
Report No.: 2006-P-00013
Date Issued: 02/28/2006

Recommendation

Recommendation 2-3: Accounting Definitions: EPA should agree to define costs in a manner that supports management decision making and improve their accounting of such resources to maximize achieving program goals.

Planned Completion Date: October 31, 2011

Action Office: OSWER
Report Title: More Information Is Needed on Toxaphene Degradation Products
Report No.: 2006-P-00007
Date Issued: 12/15/2005

Recommendation

Recommendation 1: We recommend that the Administrator direct the Assistant Administrators for Water and for Solid Waste and Emergency Response to:

- a. Develop, validate, and approve the gas chromatograph with negative ion mass spectroscopy method to analyze toxaphene degradation products, especially p26, p40, p41, p44, p50, p62, Hx-Sed, and Hp-Sed; and
- b. Use the gas chromatograph with negative ion mass spectroscopy method to analyze for toxaphene degradation products during sampling and testing at sites known to contain toxaphene, or whenever monitoring for toxaphene contamination.

Planned Completion Date (CA 6): January 6, 2012

Planned Completion Date (CA 7): September 15, 2012

Action Office: OECA
Report Title: Limited Knowledge of the Universe of Regulated Entities Impedes EPA's Ability to Demonstrate Changes in Regulatory Compliance
Report No.: 2005-P-00024
Date Issued: 09/15/2005

Recommendation

Recommendation 2-4: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance develop an objective of having the most up-to-date and reliable data on all entities that fall under its regulatory responsibility. OECA should adopt the goals of requiring states to track, record, and report data for entities over which states have regulatory responsibility. To achieve this goal, OECA should develop a multi-state, multi-program pilot program of collecting data that states track, record, verify, and report.

Planned Completion Date: September 30, 2012

Action Office: OAR
Report Title: Substantial Changes Needed in Implementation and Oversight of Title V Permits If Program Goals Are To Be Fully Realized
Report No.: 2005-P-00010
Date Issued: 03/09/2005

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Air and Radiation develop and issue guidance or rulemaking on annual compliance certification content that requires responsible officials to certify compliance with all applicable terms and conditions of the permit, as appropriate.

Planned Completion Date: January 31, 2012
Original Completion Date: July 30, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Air and Radiation issue the draft rule regarding intermittent versus continuous monitoring as it relates to annual compliance certifications and including credible evidence.

Planned Completion Date: September 15, 2012
Original Completion Date: October 31, 2012

Recommendation 2-3: We recommend that the Assistant Administrator for Air and Radiation develop nationwide guidance or rulemaking, as appropriate, on the contents of statements of basis which includes discussions of monitoring, operational requirements, regulatory applicability determinations, explanations of any conditions from previously issued permits that are not being transferred to the Title V permit, discussions of streamlining requirements, and other factual information, where advisable, including a listing of prior Title V permits issued to the same applicant at the plant, attainment status, and construction, permitting, and compliance history of the plant.

Planned Completion Date: January 31, 2012
Original Completion Date: July 30, 2011

Action Office: OAR
Report Title: Additional Analyses of Mercury Emissions Needed Before EPA Finalizes Rules for Coal-Fired Electric Utilities
Report No.: 2005-P-00003
Date Issued: 02/03/2005

Recommendations

Recommendation 2-1: We recommend that the Assistant Administrator for Air and Radiation conduct an unbiased analysis of the mercury emissions data to establish a maximum achievable control technology floor in accordance with the requirements of the Clean Air Act Section 112(d).

Planned Completion Date: December 16, 2011

Recommendation 2-2: We recommend that the Assistant Administrator for Air and Radiation re-negotiate with the court petitioner for an extension of the final rulemaking deadline sufficient to solicit and accept public comments on the unbiased analysis of mercury emissions data in an open, public, and transparent manner.

Planned Completion Date: December 16, 2011

Recommendation 3-1: We recommend that the Assistant Administrator for Air and Radiation re-assess the basis for the interim and final caps on mercury emissions. This analysis should consider the results of the re-assessed maximum achievable control technology floor (see Recommendation 2-1).

Planned Completion Date: December 1, 2011

Action Office: OW
Report Title: Wastewater Management: Controlling and Abating Combined Sewer Overflows
Report No.: 2002-P-00012
Date Issued: 08/26/2002

Recommendation

Recommendation 5-1: We recommend that the Assistant Administrator for Water work with combined sewer overflow permitting authorities and communities to assure they negotiate and establish proper levels of interim monitoring of combined sewer overflow efforts to determine the impact of the project on water quality.

Planned Completion Date: September 30, 2012

Action Office: OECA
Report Title: State Enforcement of Clean Water Act Dischargers Can Be More Effective
Report No.: 2001-P-00013
Date Issued: 08/14/2001

Recommendations

Recommendation 3-1: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance make modernizing the Permit Compliance System a high priority. Further, ensure that future systems: (a) require electronic submission and evaluation of self-monitoring reports for all dischargers, including minor facilities and storm water; and (b) track storm water permits, inspections, compliance rates, and enforcement actions.

Planned Completion Date: September 30, 2012

Recommendation 3-2: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance accelerate the development of the Interim Data Exchange Format for the Permit Compliance System. Also, before proceeding further into design and development, work with OW to ensure there is an up-to-date policy statement for water system criteria.

Planned Completion Date: September 30, 2012

Recommendation 3-4: We recommend that the Assistant Administrator for Enforcement and Compliance Assurance continue to report the Permit Compliance System as an Agency-level weakness until the modernization project is implemented and the system data is reasonably accurate and complete.

Planned Completion Date: December 31, 2013

OIG Reports With Unimplemented Recommendations by Program Office as of September 30, 2011

Recommendations With Past Due Completion Dates

OARM

- 10-P-0002** Review of Hotline Complaint on Employee Granted Full-Time Work-at-Home Privileges
- 09-P-0087** EPA Plans for Managing Counter Terrorism/Emergency Response Equipment and Protecting Critical Assets Not Fully Implemented

OECA

- 10-P-0009** EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act

ORD

- 10-P-0042** Lack of Final Guidance on Vapor Intrusion Impedes Efforts to Address Indoor Air Risks

OW

- 10-R-0057** EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
- 09-P-0223** EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality Standards

Region 3

- 2007-P-00031** Development Growth Outpacing Progress in Watershed Efforts to Restore the Chesapeake Bay

Recommendations With Future Planned Completion Dates

OAR

- 11-R-0179** EPA Needs to Better Document Project Delays for Recovery Act Diesel Emissions Reduction Act Grants
- 11-P-0010** ENERGY STAR Label Needs to Assure Superior Energy Conservation Performance
- 10-P-0154** Key Activities in EPA's Integrated Urban Air Toxics Strategy Remain Unimplemented
- 09-P-0087** EPA Plans for Managing Counter Terrorism/Emergency Response Equipment and Protecting Critical Assets Not Fully Implemented

Compendium of Unimplemented Recommendations as of September 30, 2011
(Report No. 12-N-0034)

- 2008-P-00206** Voluntary Greenhouse Gas Reduction Programs Have Limited Potential
- 2005-P-00010** Substantial Changes Needed in Implementation and Oversight of Title V Permits If Program Goals Are To Be Fully Realized
- 2005-P-00003** Additional Analyses of Mercury Emissions Needed Before EPA Finalizes Rules for Coal-Fired Electric Utilities

OARM

- 11-R-0179** EPA Needs to Better Document Project Delays for Recovery Act Diesel Emissions Reduction Act Grants
- 11-P-0031** EPA Needs to Strengthen Internal Controls for Determining Workforce Levels
- 11-1-0015** Audit of EPA's Fiscal 2010 and 2009 Consolidated Financial Statements
- 10-P-0002** Review of Hotline Complaint on Employee Granted Full-Time Work-at-Home Privilege

OCFO

- 11-P-0362** EPA Needs to Reexamine How It Defines Its Payment Recapture Audit Program
- 11-P-0031** EPA Needs to Strengthen Internal Controls for Determining Workforce Levels
- 11-P-0019** Improvements Needed in EPA's Efforts to Replace Its Core Financial System
- 10-P-0077** EPA Needs to Improve Its Recording and Reporting of Fines and Penalties

OCSP

- 10-P-0066** EPA Needs a Coordinated Plan to Oversee Its Toxic Substances Control Act Responsibilities

OECA

- 10-P-0230** ECHO Data Quality Audit Phase II Results: EPA Could Achieve Data Quality Rate with Additional Improvements
- 10-P-0077** EPA Needs to Improve Its Recording and Reporting of Fines and Penalties
- 10-P-0009** EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act
- 10-P-0007** EPA Oversight and Policy for High Priority Violations of Clean Air Act Need Improvement
- 09-P-0144** EPA Needs to Improve Internal Controls to Increase Cost Recovery
- 2007-P-00027** Overcoming Obstacles to Measuring Compliance: Practices in Selected Federal Agencies
- 2005-P-00024** Limited Knowledge of the Universe of Regulated Entities Impedes EPA's Ability to Demonstrate Changes in Regulatory Compliance
- 2001-P-00013** State Enforcement of Clean Water Act Dischargers Can Be More Effective

OEI

- 11-P-0159** Improvements Needed in EPA's Network Traffic Management Practices
- 10-P-0146** Improvements Needed in Key EPA Information System Security Practices
- 10-P-0058** Self-reported Data Unreliable for Assessing EPA's Computer Security Program
- 09-P-0127** EPA Has Improved Its Response to Freedom of Information Act Requests But Further Improvement Is Needed
- 2007-P-00008** EPA Could Improve Controls over Mainframe Software

ORD

- 11-P-0333** Office of Research and Development Needs to Improve Its Method of Measuring Administrative Savings
- 11-N-0199** EPA's Small Business Innovative Research Awards Should Include Additional Certifications to Reduce Risk
- 10-P-0176** EPA's Office of Research and Development Performance Measures Need Improvement
- 09-P-0235** EPA Needs an Oversight Program for Protocol Gases

OSWER

- 11-P-0173** EPA Promoted the Use of Coal Ash Products with Incomplete Risk Information
- 11-P-0171** EPA Needs an Agency-Wide Plan to Provide Tribal Solid Waste Management Capacity Assistance
- 11-P-0107** EPA Must Implement Controls to Ensure Proper Investigations Are Conducted at Brownfields Sites
- 11-R-0016** EPA's Terms and Conditions as Well as Process to Award Recovery Act Interagency Agreements Need Improvement
- 10-P-0133** EPA Should Improve Its Oversight of Federal Agency Superfund Reviews
- 10-P-0042** Lack of Final Guidance on Vapor Intrusion Impedes Efforts to Address Indoor Air Risks
- 08-P-0265** EPA Should Continue Efforts to Reduce Unliquidated Obligations in Brownfields Pilot Grants
- 2007-P-00002** EPA Needs to Plan and Complete a Toxicity Assessment for the Libby Asbestos Cleanup
- 2006-P-00013** EPA Can Better Manage Superfund Resources
- 2006-P-00007** More Information Is Needed on Toxaphene Degradation Products

OW

- 11-P-0001** EPA Lacks Internal Controls to Prevent Misuse of Emergency Drinking Water Facilities
- 10-P-0081** EPA Needs Procedures to Address Delayed Earmark Projects
- 10-R-0057** EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
- 09-P-0223** EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality Standards
- 2002-P-00012** Wastewater Management: Controlling and Abating Combined Sewer Overflows

Region 2

- 11-R-0232** American Recovery and Reinvestment Act Site Visit of the La Plata Water Treatment Plant Phase II Project, Aibonito, Puerto Rico
- 2007-P-00039** Limited Investigation Led to Missed Contamination at Ringwood Superfund Site
- 2007-P-00016** Environmental Justice Concerns and Communication Problems Complicated Cleaning Up Ringwood Mines/Landfill Site

Region 3

- 11-P-0433** Observed Conditions at Five Deleted Superfund Sites
- 10-P-0055** Changes in Conditions at Wildcat Landfill Superfund Site in Delaware Call for Increased EPA Oversight

Region 7

- 11-P-0048** Vapor Intrusion Health Risks at Bannister Federal Complex Not a Concern for Buildings 50 and 52, Unknown for Other Buildings

Region 9

- 10-2-0054** Examination of Costs Claimed under EPA Grant X96906001 Awarded to Walker Lake Working Group, Hawthorne, Nevada
- 08-P-00196** Making Better Use of Stringfellow Superfund Special Accounts

Region 10

- 10-4-0086** Examination of Costs Claimed under EPA Grant XP98069201 Awarded to the City of Blackfoot, Idaho

Unimplemented Recommendations: Current Compendium (Past Due Recommendations) Compared to 04/29/11 Compendium

Continuing Unimplemented Recommendation

09-P-0223 EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality
(**Recommendation 2-1**)

New Unimplemented Recommendations

10-P-0042 EPA's Office of Research and Development Could Better Use the Federal Managers' Financial Integrity Act to Improve Operations (**Recommendation 4**)

10-P-0009 EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act
(**Recommendation 2-1**)

10-P-0002 Review of Hotline Complaint on Employee Granted Full-Time Work-at-Home Privileges
(**Recommendations 1 and 2a**)

10-R-0057 EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
(**Recommendation 2**)

09-P-0087 EPA Plans for Managing Counter Terrorism/Emergency Response Equipment and Protecting Critical Assets Not Fully Implemented (**Recommendation 4-1b**)

2007-P-00031 Development Growth Outpacing Progress in Watershed Efforts to Restore the Chesapeake Bay
(**Recommendation 1**)

Removed Unimplemented Recommendations

Note: Removal of an unimplemented recommendation does not imply that it was verified as implemented, but rather that it was reported as being completed or that the target completion date has been revised.

10-P-0081 EPA Needs Procedures to Address Delayed Earmark Projects (**Recommendations 2-1, 3-1, and 3-2**)

10-P-0071 Plans to Migrate Data to the New EPA Acquisition System Need Improvement
(**Recommendation 3**)

10-R-0057 EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects
(**Recommendations 1 and 2**)

09-P-0232 EPA's Office of Research and Development Could Better Use the Federal Managers' Financial Integrity Act to Improve Operations (**Recommendation 2-1**)

Compendium of Unimplemented Recommendations as of September 30, 2011
(Report No. 12-N-0034)

- 09-P-0223** EPA Needs to Accelerate Adoption of Numeric Nutrient Water Quality Standards
(Recommendations 2-3, 2-4, and 2-5)
- 08-P-0213** Oglala Sioux Single Audits—Corrective Actions Taken but Improvements Needed in Resolving Costs
(Recommendation 1)
- 08-P-0049** Despite Progress, EPA Needs to Improve Oversight of Wastewater Upgrades in the Chesapeake Bay Watershed
(Recommendation 2-1)
- 2007-P-00027** Overcoming Obstacles to Measuring Compliance: Practices in Selected Federal Agencies
(Recommendation 2-1)
- 2007-P-00008** EPA Could Improve Controls Over Mainframe System Software
(Recommendation 9)
- 2007-P-00007** EPA Could Improve Processes for Managing Contractor Systems and Reporting Incidents
(Recommendation 2-1)
- 2004-P-00030** EPA Needs to Reinforce Its National Pretreatment Program
(Recommendation 4-1)
- 2002-P-00012** Wastewater Management: Controlling and Abating Combined Sewer Overflows
(Recommendation 5-1)