



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

JUL 6 2011

THE INSPECTOR GENERAL

**MEMORANDUM**

**SUBJECT:** Closeout of Report OIG No. 10-P-0224, *EPA Should Revise Outdated or Inconsistent EPA-State Clean Water Act Memoranda of Agreement*, September 14, 2010

**TO:** Bob Perciasepe, Deputy Administrator  
Office of the Administrator

Cynthia Giles, Assistant Administrator  
Office of Enforcement and Compliance Assurance

Nancy Stoner, Acting Assistant Administrator  
Office of Water

Thank you for your response of June 16, 2011, to our subject report. We accept your proposed actions, as we believe that they meet the intent of the recommendations contained in our report.

As a reminder, we anticipate receiving regular updates of your corrective actions, and also a notification when the corrective action plan has been completed and the assignment has been inactivated on MATS. We also expect that your office will notify us in the event of any significant revisions to the agreed-upon corrective actions or milestone dates, as stipulated in EPA Manual 2750. The attachment provides details of the agreed-upon corrective actions.

If you or your staff have any questions regarding this memo, please contact Wade Najjum, Assistant Inspector General for the Office of Program Evaluation, at (202) 566-0827, or Dan Engelberg at (202) 566-0830.

Arthur A. Elkins, Jr.

Attachment

cc: Michael Shapiro, Office of Water  
Catherine McCabe, Office of Enforcement and Compliance Assurance  
Nena Shaw, Office of the Administrator  
Lisa Lund, Office of Enforcement and Compliance Assurance  
Randy Hill, Office of Water  
Marilyn Ramos, Office of Water  
Michael Mason, Office of Water  
Gwendolyn Spriggs, Office of Enforcement and Compliance Assurance  
Wade Najjum, Office of Inspector General  
Elizabeth Grossman, Office of Inspector General  
Dan Engelberg, Office of Inspector General  
Kathlene Butler, Office of Inspector General  
Kevin Chaffin, Office of Inspector General

## Corrective Action Plan

Lead Program Office(s)	Corrective Action	Due Date	Corrective Action
OECA and OW	2-1	<del>9/30/11</del> 12/31/11	Develop a national MOA template.
OECA and OW	2-2	<del>7/31/11</del> 3/31/12	Establish criteria to identify and prioritize MOAs that present the greatest barriers to state performance and need to be updated and renegotiated.
OECA and OW	2-2, 2-3	<del>12/31/11</del> 3/31/12	Incorporate into regular NPDES program reviews a systematic approach to identify and review problematic MOAs based on the established criteria.
OECA and OW	2-2	<del>1/1/12</del> 4/1/12	Begin review of problematic MOAs as part of the regular and periodic NPDES review process, using the new MOA template.
OECA and OW	2-2	9/30/17	<i>Using the tracking system, verify that MOAs identified during the first four-year round of integrated permitting and enforcement reviews are updated.</i>
OW	2-4	<del>6/30/11</del> 12/31/11	Develop a system to maintain a publicly available repository of MOAs.