



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

JUL 26 2019

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Certification Memo for OIG Management Alert: "To Minimize the Risk of Environmental Harm, EPA Needs to Re-Evaluate the Security" Report No. 18-P00217, dated June 21, 2018

FROM: Barnes Johnson, Director
Office of Resource Conservation and Recovery

A handwritten signature in blue ink that reads "Barnes Johnson".

TO: Holly W. Greaves, Chief Financial Officer
Office of the Chief Financial Officer

Audit Report Number: 18-P00217-167

Audit Report Title: Management Alert: "To Minimize the Risk of Environmental Harm, EPA Needs to Re-Evaluate the Security"

Audit Report Date: 2018-06-21

Resolution Date: 2018-08-21

I certify that all corrective actions specified in the July 31, 2018 memo from OLEM Acting Assistant Administrator Barry N. Breen to Inspector General Arthur Elkins that pertain to the Office of Resource Conservation and Recovery have been completed.

All sufficient and relevant documentation is available in the ORCR Office AFC's records/files to support this conclusion.

No.	OIG Recommendation	High Level Intended Corrective Action	Due Date	Evidence of Completion
1	Obtain an understanding of the impact of a breach of the EPA's Electronic Manifest system's hazardous material information from the U.S. Department of Homeland Security and re-evaluate the security categorization accordingly.	OLEM engaged with the U.S. Department of Homeland Security to factor DHS concerns into assessing the impact of a breach of the EPA's Electronic Manifest system's hazardous waste information and determined whether re-evaluation of the security categorization, independent of the annual re-evaluation, is necessary.	Action completed as of OLEM response to OIG 07/31/2018	Memo and attachments on file Completed: 07-31-2018
2	Re-evaluate the security categorization of the Electronic Manifest system annually or when there are significant changes to the system (including allowing the system to be used by emergency responders) as required by the EPA's Information Security Risk Assessment Procedures.	OLEM's e-Manifest Security Plan includes a process for re-evaluating the security categorization of the Electronic Manifest system annually or when there are significant changes (including any potential use of the system by emergency responders) as required by the EPA's Information Security - Risk Assessment Procedures.	Complete by 2 nd qtr 2019	Memo and attachments on file Completed: 04-30-2019
3	In coordination with the EPA Office of Environmental Information and the National Institute of Standards and Technology, determine whether the Electronic Manifest system's hazardous material information should be handled as Pollution Prevention and Control Information or Inventory Control Information with special considerations for hazardous materials, and re-evaluate the security categorization accordingly.	OLEM will coordinate with the EPA Office of Environmental Information and, as necessary, the National Institute of Standards and Technology to determine whether the Electronic Manifest system's hazardous waste information should be handled as Pollution Prevention and Control Information or Inventory Control Information with special considerations for hazardous wastes, and determine whether re-evaluation of the security categorization, independent of the annual re-evaluation, is necessary.	Complete by May 17, 2018	RCRA Information System Security Plan Review Pages Completed: 05-17-18