



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

THE INSPECTOR GENERAL

September 10, 2021

**MEMORANDUM**

**SUBJECT:** Response to the Planned Corrective Actions for Office of Inspector General Report No. 21-P-0131, *Staffing Constraints, Safety and Health Concerns at EPA's National Enforcement Investigations Center May Compromise Ability to Achieve Mission*, issued May 12, 2021

**FROM:** Sean W. O'Donnell

A handwritten signature in blue ink, reading "Sean W O'Donnell", is placed next to the printed name.

**TO:** Lawrence Starfield, Acting Assistant Administrator  
Office of Enforcement and Compliance Assurance

Thank you for your July 16, 2021 memorandum regarding corrective actions in response to the subject final report. The report contained ten recommendations, and Recommendations 2, 4, 6, 7, and 8 were previously resolved. Based on the information and supporting documentation provided, we agree with the proposed corrective actions for Recommendations 1 and 3.

We do not agree with the Agency's planned corrective actions for Recommendations 5, 9, and 10. In Recommendations 5, 9, and 10 we recommended that the Office of Enforcement and Compliance Assurance develop performance standards including metrics to measure safety, health, work environment, and work culture for OECA's Office of Criminal Enforcement and Training and the National Enforcement Investigations Centers senior management. While OECA has committed to updating performance standards and taking steps to identify any needed action in these areas, it has not committed to "develop and incorporate metrics" into such standards. We therefore consider these three recommendations unresolved. EPA Manual 2750 requires that recommendations be resolved promptly.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Henry Barnet, Director, Office of Criminal Enforcement, Forensics and Training  
Pam Mazakas, Deputy Director, Office of Criminal Enforcement, Forensics and Training  
Erica Canzler, Director, National Enforcement Investigation Center  
Francisco Cruz, Deputy Director, National Enforcement Investigation Center  
Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance  
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