



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

OFFICE OF
INSPECTOR GENERAL

September 16, 2021

MEMORANDUM

SUBJECT: Notification of Audit:
35th Avenue Superfund Site Case Study on Cumulative Impacts
Project No. OA-FY21-0279

FROM: Christina Lovingood, Director 
Pollution Control and Cleanup Directorate
Office of Audit

TO: *See Below*

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin fieldwork on the subject audit. Our objective is to determine what actions the EPA has taken—in accordance with its mission, its program goals, and applicable executive orders—to identify and address any disproportionate health effects to disadvantaged communities located on or near a selected site. We have selected the 35th Avenue Superfund site in Birmingham, Alabama. This audit also addresses the following top management challenge for the Agency, as identified in our [EPA's FYs 2020-2021 Top Management Challenges](#) report issued July 21, 2020: integrating and leading environmental justice.

We plan to conduct work within the applicable program offices and Region 4. The Office of Land and Emergency Management will be our primary point of contact. Applicable generally accepted government auditing standards will be used in conducting and reporting on our work. The anticipated benefits of this audit include improving the EPA's coordination of programs to mitigate disproportionate health effects and address cumulative impacts on communities with environmental justice concerns in general, as well as specifically on those communities located on or near the 35th Avenue Superfund site.

We will contact you with a mutually agreeable time to discuss our audit objective. We would also be particularly interested in any areas of concern you may have. We will answer any questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout our audit, we will provide updates on a regular basis to established contacts in the offices where our work will occur.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly,

EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at www.epa.gov/oig.

Addressees

Janet McCabe, Deputy Administrator

Barry Breen, Acting Assistant Administrator for Land and Emergency Management

Joseph Goffman, Acting Assistant Administrator for Air and Radiation

Radhika Fox, Assistant Administrator for Water

Michal Ilana Freedhoff, Assistant Administrator for Chemical Safety and Pollution Prevention

Lawrence Starfield, Acting Assistant Administrator for Enforcement and Compliance Assurance

Wayne E. Cascio, M.D., Acting Principal Deputy Assistant Administrator for Science Performing
Delegated Duties of Assistant Administrator, Office of Research and Development

John Blevins, Acting Regional Administrator, Region 4

cc: Dan Utech, Chief of Staff, Office of the Administrator
Wesley J. Carpenter, Deputy Chief of Staff, Office of the Administrator
Andrew LeBlanc, Agency Follow-Up Coordinator
José Kercado, Backup Agency Follow-Up Coordinator
Lindsay Hamilton, Associate Administrator for Public Affairs
Lance McCluney, Director, Office of Administrative and Executive Services, Office of
the Administrator
Victoria Arroyo, Associate Administrator for Policy, Office of the Administrator
Carlton Waterhouse, Deputy Assistant Administrator for Land and Emergency Management
Larry Douchand, Director, Office of Superfund Remediation and Technology Innovation,
Office of Land and Emergency Management
Randall Chaffins, Director, Region 4 Superfund and Emergency Management Division
Elizabeth Shaw, Deputy Assistant Administrator for Air and Radiation
Benita Best-Wong, Deputy Assistant Administrator for Water
Jake Li, Deputy Assistant Administrator for Pesticide Programs, Office of Chemical Safety
and Pollution Prevention
Richard Keigwin, Deputy Assistant Administrator for Management, Office of Chemical
Safety and Pollution Prevention
Chris Frey, Deputy Assistant Administrator for Science Policy, Office of Research
and Development
Chris Robbins, Deputy Assistant Administrator for Management, Office of Research
and Development

Matthew Tejada, Director, Office of Environmental Justice, Office of the Administrator
Kecia Thornton, Audit Follow-Up Coordinator, Office of Land and Emergency Management
Eleanor Marusiak, Audit Follow-Up Coordinator, Office of Air and Radiation
Eunjee Koh, Audit Follow-Up Coordinator, Office of Air and Radiation
Grant Peacock, Audit Follow-Up Coordinator, Office of Air and Radiation
Tiffany Crawford, Audit Follow-Up Coordinator, Office of Water
Janet Weiner, Senior Audit Advisor, Office of Chemical Safety and Pollution Prevention
Kelly van Bronkhorst, Audit Follow-Up Coordinator, Office of Research and Development
Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and
Compliance Assurance
Regional Audit Follow-Up Coordinators, Regions 1–10
Sean W. O'Donnell, Inspector General
Charles J. Sheehan, Deputy Inspector General
Edward S. Shields, Associate Deputy Inspector General
Benjamin May, Counsel to the Inspector General
Kellie J. Walker, Acting Deputy Chief of Staff, Office of Inspector General
Katherine Trimble, Assistant Inspector General for Audit
Paul Bergstrand, Acting Assistant Inspector General for Special Review and Evaluation
Helina P. Wong, Assistant Inspector General for Investigations
Jee Kim, Acting Deputy Assistant Inspector General for Management
Tom Collick, Deputy Counsel to the Inspector General
Erin Barnes-Weaver, Acting Deputy Assistant Inspector General for Evaluation
Susan Barvenik, Associate Deputy Counsel to the Inspector General
James Hatfield, Associate Deputy Assistant Inspector General for Audit
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs
Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General
Lori Hoffman, Congressional and Media Liaison, Office of Inspector General