



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

THE INSPECTOR GENERAL

November 2, 2021

MEMORANDUM

SUBJECT: Response to Planned Corrective Actions for Office of Inspector General
Report No. 21-P-0114, *EPA Does Not Consistently Monitor Hazardous Waste Units
Closed with Waste in Place or Track and Report on Facilities That Fall Under the Two
Responsible Programs*, issued March 29, 2021

FROM: Sean W. O'Donnell

TO: Barry Breen, Acting Assistant Administrator
Office of Land and Emergency Management

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

Thank you for your May 27, 2021 memorandum, which outlines the U.S. Environmental Protection Agency's planned corrective actions and estimated completion dates for the three unresolved recommendations issued in the subject Office of Inspector General report. Based on the information and supporting documentation provided, the planned corrective actions for Recommendations 5 and 6 meet the intent of our recommendations. We agree with the extended corrective action completion date of March 31, 2023, for Recommendation 6.2 because the action is dependent on the completion of the corrective action for Recommendation 5, which has a completion date of December 31, 2022. You should track implementation of the corrective actions in the Agency's audit tracking system until all actions are completed.

Three other recommendations—Recommendations 1, 3, and 4—were previously resolved. However, we do not agree with the planned corrective actions for Recommendation 2.

Recommendation 2 states that the Office of Enforcement and Compliance Assurance, in collaboration with the Office of Land and Emergency Management, should “establish mechanisms to ensure that all inspections are completed within the required time frame of two years for operating treatment, storage, or disposal facilities or the policy time frame of three years for nonoperating treatment, storage, or disposal facilities.” In response, you proposed to develop and distribute reports to EPA's regions that track inspections. While tracking is useful, this alone will not ensure that all inspections are completed within the required time frames.

We consider Recommendation 2 unresolved. The Agency should follow the dispute resolution process defined in EPA Manual 2750.

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

cc: Carlton Waterhouse, Deputy Assistant Administrator for Land and Emergency Management
Kecia Thornton, Audit Follow-Up Coordinator, Office of Land and Emergency Management
Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance
Andrew LeBlanc, Agency Follow-Up Coordinator
José Kercado, Backup Agency Follow-Up Coordinator
Charles J. Sheehan, Deputy Inspector General
Edward S. Shields, Associate Deputy Inspector General
Katherine Trimble, Assistant Inspector General for Audit
Paul H. Bergstrand, Acting Assistant Inspector General for Special Review and Evaluation
Laura B. Nicolosi, Principal Deputy Assistant Inspector General for Audit
James Hatfield, Associate Deputy Assistant Inspector General for Audit
Erin Barnes-Weaver, Acting Deputy Assistant Inspector General for Evaluation
Christina Lovingood, Director, Pollution Control and Cleanup Directorate, Office of Audit, Office of Inspector General
Renee McGhee-Lenart, Acting Director, Programs, Offices, and Centers Oversight Directorate, Office of Special Review and Evaluation, Office of Inspector General