



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

March 14, 2022

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: EPA Response to OIG Report titled: “EPA’s Title V Program Needs to Address Ongoing Fee Issues and Improve Oversight” - Project No. 22-E-0017, January 12, 2022

FROM: Joseph Goffman
Principal Deputy Assistant Administrator

TO: Patrick Gilbride
Director, Implementation, Execution, and Enforcement
Office of Special Review and Evaluation
Office of the Inspector General

Thank you for the opportunity to review and comment on the Office of Inspector General’s (OIG’s) report titled, “*EPA’s Title V Program Needs to Address Ongoing Fee Issues and Improve Oversight*” (Project No. 22-E-0017) (Report). The OIG has identified unresolved issues regarding the EPA’s response to the October 28, 2021 Draft Report with the same title.

The EPA notes that while Recommendations 1, 3, 4, and 5 are resolved with corrective actions pending, the Agency’s planned corrective actions for Recommendations 2 and 6 did not meet the intent of the OIG’s recommendations, and remain unresolved. The intent of this response is to resolve the response to those recommendations.

Recommendation 2: “In collaboration with the regions, convene a workgroup and develop strategies to address the national trend of declining Clean Air Act Title V revenues.”

Response 2: The OAR will collaborate with regions, convene a workgroup, and develop and implement strategies to address declining title V fee revenues.

The OAR will collaborate with regional staff to convene a workgroup and identify key stakeholders and plan for consultations.

Planned Completion Date: Fiscal Year (FY) 2023, Quarter (Q) 1

We plan to conduct consultations with permitting authorities (potentially through the Association of Air Pollution Control Agencies and the National Association of Clean Air Agencies) to determine the scope of fee deficiencies and fee structures and identify current best practices.

Planned Completion Date: Fiscal Year (FY) 2023, Quarter (Q) 4

The OAR will begin to implement the strategies to address declining title V fee revenues identified through consultations and workgroup collaboration.

Planned Completion Date: Fiscal Year (FY) 2024, Quarter (Q) 1

Recommendation 6: “Collaborate with regional staff to identify and make available the regional resources and expertise necessary to conduct fee evaluations.”

Response 6: The OAR will consult with regions to identify and make available the regional resources and expertise necessary for performing fee evaluations, including but not limited to, identifying existing staff in regional offices with the accounting expertise useful in performing fee evaluations and connecting them with permitting staff. The updated fee guidance developed as part of the OIG’s recommendations could include these contacts as well.

Planned Completion Date: Fiscal Year (FY) 2023, Quarter (Q) 1

If you have any questions regarding this response, please contact Scott Mathias, Director, Air Quality Policy Division in the Office of Air Quality Planning and Standards at (919) 541-5310.

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