



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

OFFICE OF
INSPECTOR GENERAL

May 30, 2019

MEMORANDUM

SUBJECT: Fieldwork Notification:
Analysis of EPA Enforcement Results from Fiscal Years 2006 Through 2018
Project No. OA&E-FY19-0030

FROM: Khadija Walker, Acting Director
Water Directorate
Office of Audit and Evaluation

A handwritten signature in blue ink, appearing to read "Khadija Walker", is written over a light blue circular stamp.

TO: Susan Bodine, Assistant Administrator
Office of Enforcement and Compliance Assurance

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin fieldwork with objectives modified slightly from those in our November 5, 2018, project notification memorandum. This project is included in our fiscal year 2019 annual plan.

The OIG's fieldwork objectives are to answer the following questions:

1. What are the trends in enforcement results from fiscal years 2006 through 2018 for EPA-led enforcement actions?
2. What key factors explaining (a) enforcement result trends over time and (b) differences in enforcement result trends among EPA regions and environmental statutes?

The OIG plans to conduct work in the Office of Enforcement and Compliance Assurance (OECA) as well as the regions. The fieldwork will include analysis of environmental outcomes from enforcement actions and a survey of all agency enforcement staff and managers. We will conduct our work using applicable generally accepted government auditing standards. The anticipated benefit of this project includes providing an objective analysis of EPA enforcement trends.

We will contact you to arrange a mutually agreeable time to discuss our fieldwork objectives, the purpose of our project and preliminary results from our work to date. We would be particularly interested in any areas of concern that you may have. We will answer any of your questions about the project process, reporting procedures, and methods used to gather and analyze data. Throughout the project, we will continue to provide monthly email updates to the OECA Audit Follow-Up Coordinator and specified OECA managers.

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. We will request

that you resolve the situation if an agency employee or contractor refuses to provide requested records 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*.

I will supervise the project, and the Project Manager will be Kathryn Hess. Any information related to the project should be addressed to me at (312) 886-3016 or walker.khadija@epa.gov, or Kathryn Hess at (617) 918-1487 or hess.kathryn@epa.gov.

cc: Henry Darwin, Associate Deputy Administrator and Chief of Operations
Ryan Jackson, Chief of Staff
Michael Molina, Deputy Chief of Staff
Lawrence Starfield, Principal Deputy Assistant Administrator for Enforcement and Compliance Assurance
Patrick Traylor, Deputy Assistant Administrator for Enforcement and Compliance Assurance
Rosemarie Kelly, Director, Office of Civil Enforcement, Office of Enforcement and Compliance Assurance
Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance
Bob Trent, Agency Follow-Up Coordinator
Corry Schiermeyer, Associate Administrator for Public Affairs
Regional Audit Follow-Up Coordinators, Regions 1–10
Charles J. Sheehan, Deputy Inspector General
Edward Shields, Associate Deputy Inspector General
Eric Hanger, Acting Counsel to the Inspector General
Kevin Christensen, Assistant Inspector General for Audit and Evaluation
Craig Ulmer, Acting Assistant Inspector General for Investigations
James Nussbaumer, Acting Assistant Inspector General for Management
Richard Eyermann, Deputy Assistant Inspector General for Audit and Evaluation
Christine El-Zoghbi, Deputy Assistant Inspector General for Audit and Evaluation
Kathlene Butler, Acting Deputy Assistant Inspector General for Audit and Evaluation
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs
Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General
Tia Elbaum, Congressional and Media Liaison, Office of Inspector General