



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

OFFICE OF  
INSPECTOR GENERAL

September 5, 2019

**MEMORANDUM**

**SUBJECT:** Project Notification:  
EPA National Pollutant Discharge Elimination System Permit Reviews  
Project No. OA&E-FY19-0340

**FROM:** Kathlene Butler, Director *Kathlene Butler*  
Water Directorate  
Office of Audit and Evaluation

**TO:** David P. Ross, Assistant Administrator  
Office of Water

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin fieldwork on an audit of EPA's National Pollutant Discharge Elimination System (NPDES) program.

The OIG's objective for this audit is to determine whether the EPA's reviews of state-proposed NPDES permits verify that the permits adhere to Clean Water Act requirements.

This audit is the result of hotline complaints and is based, in part, on work we initiated on June 12, 2019, in response to a previous hotline complaint project designated as OIG Project No. OA&E-FY19-0217. We initiated that work to determine whether the EPA followed appropriate Clean Water Act and NPDES regulations in Region 5 to review the PolyMet permit approved by Minnesota and issued in 2018. We will incorporate the results from our work assessing the PolyMet permit review into this nationwide audit of the EPA's NPDES permit reviews.

The OIG plans to conduct work at EPA headquarters within the Office of Water and at all EPA regional offices. Applicable generally accepted government auditing standards will be used in conducting our audit. The expected benefits of this audit include improvements in operational efficiency and identification of best practices for reviewing NPDES permits.

We will contact you to arrange a mutually agreeable time to discuss our objectives and the purpose of our audit. At this meeting, we would also 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, methods used to gather and analyze data, and what we should expect of each other during the project. Throughout the project, we will provide updates on a regular basis. To expedite our review, we ask that at the entrance conference you please provide us with any EPA headquarters standard operating procedures or policies for reviewing NPDES permits.

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. If an agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG, we will request that you resolve the situation. We may report unresolved access matters to the Administrator and include the incident in the *Semiannual Report to Congress*.

I will supervise this audit and Khadija Walker will be the Project Manager. Any information related to the project should be addressed to Kathlene Butler at (404) 562-9736 or [butler.kathlene@epa.gov](mailto:butler.kathlene@epa.gov), or Khadija Walker at (312) 886-3106 or [walker.khadija@epa.gov](mailto:walker.khadija@epa.gov).

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