




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

OFFICE OF  
INSPECTOR GENERAL

February 18, 2021

**MEMORANDUM**

**SUBJECT:** Notification of Evaluation:  
Pandemic Impact on Authorized State RCRA Programs  
Project No. OE-FY21-0124

**FROM:** Christina Lovingood, Director   
Land Cleanup and Waste Management Directorate  
Office of Evaluation

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

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an evaluation to examine the EPA Resource Conservation Recovery Act Program's operations in response to the coronavirus pandemic—that is, the SARS-CoV-2 virus and resultant COVID-19 disease. This evaluation also addresses the following top management challenges for the Agency, as identified in our EPA's FYs 2020–2021 Top Management Challenges report, issued July 21, 2020: *Maintaining operations during pandemic responses*, and *Overseeing states implementing EPA Programs*.

The OIG's objective is to evaluate the ability of authorized state Resources Conservation and Recovery Act hazardous waste programs to continue operations during the coronavirus pandemic. The OIG plans to interview the Land, Chemicals, and Redevelopment Division Directors of selected EPA regional offices, as well as managers within the Office of Land and Emergency Management. The evaluation will be conducted using Quality Standards for Inspection and Evaluation, issued by the Council of the Inspectors General on Integrity and Efficiency. Anticipated benefits of the evaluation include assessing the extent to which the RCRA cradle-to-grave oversight of hazardous waste management remains intact in authorized state RCRA programs, and the identification of EPA measures and best practices to support states in continuing to implement authorized regulatory programs during a pandemic.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

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 immediately 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](http://www.epa.gov/oig).

cc: Dan Utech, Chief of Staff

Wesley J. Carpenter, Deputy Chief of Staff

Avi Garbow, Special Advisor to the Administrator

Carlton Waterhouse, Deputy Assistant Administrator, Office of Land and Emergency Management

Kecia Thornton, Audit Follow-Up Coordinator, Office of Land and Emergency Management

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