

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

OFFICE OF INSPECTOR GENERAL

March 23, 2012

MEMORANDUM

SUBJECT: Hotline Complaint Regarding Proposal of ASTM D7575 as an Alternate

Method for Oil and Grease

FROM: Elizabeth Grossman /s/

Acting Assistant Inspector General for Program Evaluation

TO: Nancy Stoner

Acting Assistant Administrator, Office of Water

In response to a hotline complaint, the Office of Inspector General (OIG) plans to conduct a review of the process followed by the Office of Water (OW) in issuing the December 14, 2011, Notice of Data Availability (NODA) for the Agency's proposed approval of ASTM D7575 as an alternative test procedure to Method 1664A for oil and grease. Specifically, our review will address the following question:

In reviewing ASTM D7575 as an alternative method for measuring oil and grease, and issuing the proposed Methods Update Rule and subsequent NODA, did EPA adhere to applicable laws, regulations, policies, procedures and guidance, including the Clean Water Act, 40 CFR 136, and EPA's Action Development Process?

We will contact your staff to arrange our kick-off meeting, interviews, and document reviews. We plan to begin immediately and visit the Office of Water the week of April 9, 2012. At the kick-off meeting we will address any questions you may have about the OIG hotline process and reporting procedures.

If you or your staffs have any questions regarding this assignment, please contact Rick Beusse at (919) 541-5747 or beusse.rick@epa.gov, or Erica Hauck at (303) 312-6629 or hauck.erica@epa.gov.

cc: Jeff Lape, Acting Director, Office of Science and Technology (OST), OW Rob Wood, Acting Director, Engineering and Analysis Division, OST, OW Marilyn Ramos, Audit Liaison, OW Mike Mason, Audit Liaison, OW Arthur A. Elkins, Jr., Inspector General Aracely Nunez-Mattocks, Chief of Staff, OIG Eric Hanger, Acting Counsel, OIG

Eileen McMahon, Assistant Inspector General for Congressional and Public Affairs, OIG Melissa Heist, Assistant Inspector General for Audit, OIG Patrick Sullivan, Assistant Inspector General for Investigations, OIG Stephen Nesbitt, Assistant Inspector General for Cyber Investigations and Homeland Security, OIG

Patricia Hill, Assistant Inspector General for Mission Systems, OIG Rick Beusse, Director for Program Evaluation, Air and Research Issues, OIG Dan Engelberg, Director for Program Evaluation, Water and Enforcement, OIG Erica Hauck, Project Manager, Office of Program Evaluation, OIG Rich Jones, Program Analyst, Office of Program Evaluation, OIG