



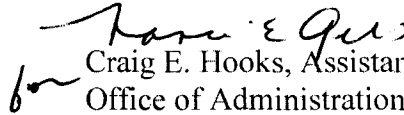
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 4 2012

MEMORANDUM

SUBJECT: Response to OIG Evaluation of the Agency's Response to Final Report No. 12-P-0417, *Weaknesses in EPA's Management of the Radiation Network System Demand Attention*

FROM: Gina A. McCarthy, Assistant Administrator
Office of Air and Radiation


Craig E. Hooks, Assistant Administrator
Office of Administration and Resources Management

TO: Arthur Elkins
Inspector General
Office of the Inspector General

This memorandum is in response to the Office of Inspector General's (OIG) evaluation report dated August 23, 2012: Evaluation of Agency Response to OIG Report 12-P-0417, *Weaknesses in EPA's Management of the Radiation Network System Demand Attention*, and transmits the Office of Air and Radiation's (OAR) and the Office of Administration and Resources Management's (OARM) consolidated response.

In the Recommendation 3.c requirement of the evaluation report, OIG recommends that the Agency also identify as part of its corrective action plan the variable, site-specific conditions that are the basis for the filter changes and the frequency for changing them under such conditions, and incorporate and record these as requirements into the Quality Assurance Project Plan.

In response, there are many variable, site-specific conditions which preclude identifying a specific number or frequency of filter changes for each monitor. These variables include, but are not limited to, conditions that could affect the safety of operators (such as extreme weather conditions, construction activity or environmental hazards), the amount of particles in the air (such as wildfires, construction or abnormal weather), and the availability of operators (such as variations in an operator's primary, non-volunteer work schedule).

As noted in previous communications with the OIG, the filters from the RadNet real-time monitors measure radiation emitted from the filters themselves and the monitors report the

results continuously. Thus, the frequency of filter changes for the RadNet real-time monitor does not affect the quality of the results from either the real-time data (from the filters) or the laboratory analysis of the filters. Consideration of filter change frequency was included in the RadNet Quality Assurance Project Plan for estimating laboratory throughput.

As requested, a discussion of these site-specific variables and their impact on filter change frequency will be incorporated into the RadNet Quality Assurance Project Plan and provided to the OIG. Once this action is completed, OAR requests OIG close this recommendation.

Regarding the Recommendation 5 requirement to complete the past performance evaluation for contract EP-D-08-068, the Contracting Officer, Contracting Officer's Technical Representative, and contractor have completed and processed the report in the Contractor Performance Assessment Reporting System (CPARS) as of September 13, 2012. As a result, this action is complete and OARM requests OIG close this recommendation as well.

Please feel free to contact us, or your staff may contact Mike Flynn at 202-343-9356, if you have any questions, comments, or concerns.

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