



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

OFFICE OF
INSPECTOR GENERAL

October 15, 2015

MEMORANDUM

SUBJECT: Project Notification:
Lifecycle Impacts of Renewable Fuel Standard
Project No. OPE-FY16-0005

FROM: Patrick Gilbride, Director /s/
Science, Research, and Management Integrity Evaluations
Office of Program Evaluation

TO: Janet McCabe, Acting Assistant Administrator
Office of Air and Radiation

Thomas Burke, Deputy Assistant Administrator for Research and Science Advisor
Office of Research and Development

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin preliminary research on lifecycle impacts of the EPA's renewable fuel standard.

Our objectives are to determine whether the EPA: 1) complied with the reporting requirements of laws authorizing the Renewable Fuel Standard (RFS); and 2) updated the lifecycle analysis supporting the RFS with findings from the statutorily mandated National Academy of Sciences 2011 study on biofuels, the EPA's 2011 Report to Congress on the Environmental Impacts of Biofuels, as well as any subsequent reports or relevant research on lifecycle impacts of biofuels. We plan to perform our work within the Office of Air and Radiation and the Office of Research and Development.

Applicable generally accepted government auditing standards will be used in conducting our project. The anticipated benefits of this project are to ensure public health and the environment are protected by verifying the EPA is complying with reporting requirements, and is considering statutorily mandated studies when promulgating the RFS.

We will work with your Audit Follow-Up Coordinators to arrange a mutually agreeable time to discuss our objectives and the purpose of the preliminary research phase of our project. 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 course of the project. We would also be particularly interested in any areas of concern that you may have. Throughout the project, we will provide updates on a regular basis, as agreed upon at this meeting.

To ensure timely completion of this project, please provide the following information (if available) to the Project Manager, Ms. Erin Barnes-Weaver. The information should be provided prior to or at the time of the kickoff meeting, and include:

- Triennial Reports to Congress issued after the EPA's first report in 2011, and any other reports to Congress on the environmental and resource conservation impacts of the RFS program.
- RFS Antibracksliding Analysis required under Section 211(v) of the Clean Air Act.
- Documentation of the EPA's response to the 2011 National Academy of Sciences study and its recommendations.
- Documented changes or planned future modifications to the RFS regulatory impact analysis or lifecycle analysis based on findings/recommendations from the 2011 National Academy of Sciences study, Triennial Reports to Congress, and/or Antibracksliding Analysis (or documentation explaining why no changes were necessary).

We respectfully note that the OIG is authorized by the Inspector General Act of 1978 to have timely access to personnel and all materials necessary to complete its objectives. We will request your resolution 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.

Should you or your staff have any questions, please contact me at (303) 312-6969 or gilbride.patrick@epa.gov; or Erin Barnes-Weaver at (303) 312-6871 or barnes-weaver.erin@epa.gov.

cc: Elizabeth Shaw, Deputy Assistant Administrator, Office of Air and Radiation
Robert Kavlock, Deputy Assistant Administrator for Science, Office of Research and Development
Lek Kadeli, Principal Deputy Assistant Administrator for Management, Office of Research and Development
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