



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

OFFICE OF  
INSPECTOR GENERAL

August 22, 2017

**MEMORANDUM**

**SUBJECT:** Project Notification:  
Evaluation of Importers' and Manufacturers' Chemical Data Reporting Under the Toxic  
Substance Control Act  
Project No. OPE-FY17-0025

**FROM:** Jeffrey Harris, Director  
Toxics, Chemical Management and Pollution Prevention Evaluations  
Office of Program Evaluation

**TO:** Wendy Cleland-Hamnett, Acting Assistant Administrator  
Office of Chemical Safety and Pollution Prevention

Lawrence Starfield, Acting Assistant Administrator  
Office of Enforcement and Compliance Assurance

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin preliminary research to assess Chemical Data Reporting (CDR) under the Toxic Substance Control Act (TSCA).

The specific objectives for this evaluation are to determine (1) how the EPA is ensuring that companies are compliant with CDR requirements under TSCA and (2) whether the EPA is using CDR data to prioritize imported and manufactured chemicals for the purpose of identifying the potential for human health and environmental risks.

The OIG plans to conduct work at EPA headquarters and at any other appropriate sites. Applicable generally accepted government auditing standards will be used in conducting our project. The anticipated benefits of this project are reduced risks to human health and the environment from the monitoring and oversight of TSCA chemicals subject to the CDR rule reporting requirements.

We will contact you to arrange a mutually agreeable time to discuss our objectives and the purpose of the preliminary research phase of our project. 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 course of the project. 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, Chad Kincheloe, prior to or at the time of the kickoff meeting:

- Policies, procedures and guidance on how CDR data is used in the prioritization of chemicals for TSCA risk evaluations and/or other assessments.
- Policies, procedures and guidance regarding the quality assurance/quality control of CDR data.
- Enforcement response policy and guidance for CDR violations.

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.

I will supervise the project and, as mentioned earlier in this memorandum, the Project Manager will be Chad Kincheloe. Any information related to the project should be addressed to me at (202) 566-0831 or [harris.jeffrey@epa.gov](mailto:harris.jeffrey@epa.gov) or to Chad Kincheloe at (312) 886-6530 or [kincheloe.chad@epa.gov](mailto:kincheloe.chad@epa.gov).

cc: Ryan Jackson, Chief of Staff  
Henry Darwin, Chief of Staff for Operations  
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