



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

OFFICE OF  
INSPECTOR GENERAL

October 4, 2018

**MEMORANDUM**

**SUBJECT:** Project Notification:  
EPA Enforcement of Toxic Release Inventory (TRI) Late Reporters  
Project No. OA&E-FY18-0002

**FROM:** Christina Lovingood, Director /s/  
Land Cleanup and Waste Management  
Office of Audit and Evaluation

**TO:** Susan Bodine, 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 regarding EPA Enforcement of Toxic Release Inventory (TRI) Late Reporters. Our project objective will address whether the EPA is taking enforcement actions against companies that delay required reporting of chemical release data to EPA's TRI.

Our project will include the Office of Enforcement and Compliance Assurance, and will involve the analysis of TRI reporting data from select regions to be determined at a later date. Applicable generally accepted government auditing standards will be used in conducting our project. The potential returns on investment for this project include recommendations that may result in additional enforcement penalties (potential monetary benefits) and enhanced integrity of TRI data.

We will contact you to arrange a mutually agreeable time to discuss our objective 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 project. Throughout the project, we will provide updates on a regular basis to established contacts from the respective offices.

To ensure the success and timely completion of this project, please provide your input on regions, stakeholders and any experts we should contact during preliminary research.

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 resolve the situation 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*.

The project will be supervised by me and the Project Manager will be Dwayne Crawford. Any information related to the project should be addressed to me at (202) 566-2906 or [lovingood.tina@epa.gov](mailto:lovingood.tina@epa.gov), or Dwayne Crawford at (202) 566-2894 or [crawford.dwayne@epa.gov](mailto:crawford.dwayne@epa.gov).

cc: Henry Darwin, Acting Deputy Administrator  
Ryan Jackson, Chief of Staff  
Michael Molina, Senior Advisor, Office of the Administrator  
Lawrence Starfield, Principal Deputy Assistant Administrator for Enforcement and Compliance Assurance  
Charlotte Bertrand, Acting Principal Deputy Assistant Administrator for Chemical Safety and Pollution Prevention  
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