



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

OFFICE OF
INSPECTOR GENERAL

June 16, 2021

MEMORANDUM

SUBJECT: Notification of Evaluation:
EPA's Screening of Environmental Violations that the Regulated Community Self-
Reports via the eDisclosure System
Project No. OSRE-FY21-0212

FROM: Patrick Gilbride, Director *Patrick D. Gilbride*
Implementation, Execution, and Enforcement Directorate
Office of Special Review and Evaluation

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

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an evaluation regarding the EPA's efforts to screen environmental violations that the regulated community self-reports via the EPA's eDisclosure system. This evaluation also addresses the following top management challenge for the Agency, as identified in our [*EPA's FYs 2020–2021 Top Management Challenges*](#) report, issued July 21, 2020: complying with key internal control requirements (data quality).

The OIG's objective is to determine whether the EPA's process for screening self-reported violations through its eDisclosure system is effective and ensures that significant concerns, such as criminal conduct and potential imminent hazards, are addressed by the Office of Enforcement and Compliance Assurance. The OIG plans to conduct work within the Office of Enforcement and Compliance Assurance and the EPA's regional offices. The evaluation will be conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this evaluation include improved operational efficiency to mitigate the risk of fraud in data that are self-reported by the regulated community.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

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. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his "expectation that EPA

personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials 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*.

We will post this memorandum on our public website at www.epa.gov/oig.

cc: Janet McCabe, Deputy Administrator
Dan Utech, Chief of Staff, Office of the Administrator
Wesley J. Carpenter, Acting Deputy Chief of Staff, Office of the Administrator
Avi Garbow, Special Advisor to the Administrator
Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance
Andrew LeBlanc, Agency Follow-Up Coordinator
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Lindsay Hamilton, Associate Administrator for Public Affairs
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