

U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL

**2022**  
SEMIANNUAL



**REPORT  
TO  
CONGRESS**

**APR 1 – SEP 30, 2022**

# **Index of Reporting Requirements**

## ***Inspector General Act of 1978, as amended***

Requirement	Subject	Addressed in
Section 4(a)(2)	Recommendations concerning impact of existing and proposed legislation and regulations	Section 1.6
Section 5(a)(1)	Significant problems, abuses, and deficiencies relating to programs and operations	Section 2.1
Section 5(a)(2)	Significant recommendations for corrective action relating to programs and operations	Section 2.1
Section 5(a)(3)	Reports with corrective action not completed	Appendix 3
Section 5(a)(4)	Matters referred to prosecutive authorities and resulting prosecutions and convictions	Sections 2.1, 2.2, and 3.2; Appendix 4
Section 5(a)(5)	Instances where information or assistance was refused or not provided	Section 2.3
Section 5(a)(6)	List of audit, inspection, and evaluation reports issued	Appendix 1
Section 5(a)(7)	Summaries of significant reports	Section 2.1
Section 5(a)(8)	Audit, inspection, and evaluation reports—questioned costs	Section 3.1
Section 5(a)(9)	Audit, inspection, and evaluation reports—funds to be put to better use	Section 3.1
Section 5(a)(10)	Prior audit, inspection, and evaluation reports (1) for which no management decision was made by the end of the reporting period, (2) for which no establishment comment was returned within 60 days, and (3) for which there are unimplemented recommendations	Appendixes 2 and 3
Section 5(a)(11)	Significant revised management decisions	n/a
Section 5(a)(12)	Significant management decisions with which OIG disagreed	Appendix 2
Section 5(a)(14–16)	Peer reviews conducted	Appendix 5
Section 5(a)(17–18)	Statistics on investigative reports, referrals, prosecutions, and indictments	Section 3.2
Section 5(a)(19)	Substantiated investigations involving senior government employees	Appendix 4
Section 5(a)(20)	Instances of whistleblower retaliation	Section 2.3
Section 5(a)(21)	Any establishment attempts to interfere with independence	Section 2.3
Section 5(a)(22)	Closed audits, inspections, evaluations, and investigations not disclosed to public	Appendix 4

### **Abbreviations**

C.F.R.	Code of Federal Regulations
CSB	U.S. Chemical Safety and Hazard Investigation Board
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
GS	General Schedule
IIJA	Infrastructure Investment and Jobs Act
OIG	Office of Inspector General
PFAS	Perfluoroalkyl and Polyfluoroalkyl Substances
Pub. L.	Public Law
SES	Senior Executive Service
U.S.C.	United States Code

**Are you aware of fraud, waste, or abuse in an EPA or CSB program?**

#### **EPA Inspector General Hotline**

1200 Pennsylvania Avenue, NW (2431T)  
Washington, D.C. 20460  
(888) 546-8740  
(202) 566-2599 (fax)  
[OIG\\_Hotline@epa.gov](mailto:OIG_Hotline@epa.gov)

Learn more about our [OIG Hotline](#).

#### **EPA Office of Inspector General**

1200 Pennsylvania Avenue, NW (2410T)  
Washington, D.C. 20460  
(202) 566-2391  
[www.epa.gov/oig](http://www.epa.gov/oig)

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# Message to Congress

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It is my pleasure to present to you this *Semiannual Report to Congress*, summarizing the work of the Office of Inspector General for the U.S. Environmental Protection Agency. As detailed within these pages, the OIG, which also serves as the OIG for the U.S. Chemical Safety and Hazard Investigation Board, has been providing effective and consequential oversight of Agency operations and programs.



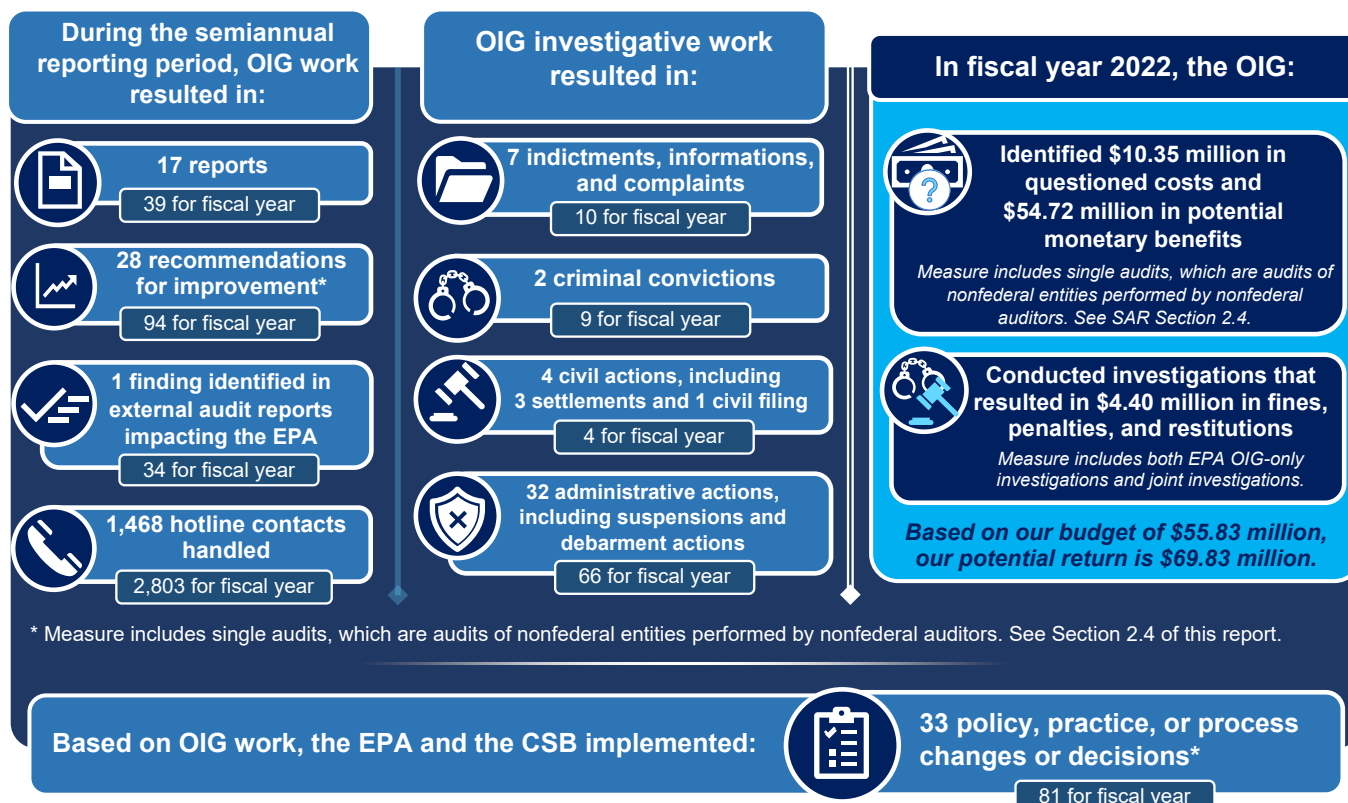
Sean W. O'Donnell

***Oversight of Infrastructure Investment and Jobs Act Efforts.*** In fiscal year 2022, the EPA began receiving its IIJA funding, which will total an unprecedented \$60 billion to execute infrastructure-related projects. Correspondingly, in this semiannual period, we published the inaugural edition of our [IIJA Oversight Plan](#) and immediately began our work to deter waste, fraud, and abuse and promote efficiency and effectiveness. We combed through previous oversight reports to identify areas in which the EPA has historically faced challenges, publishing a series of lessons-learned reports to help the Agency avoid [grant award](#), [grant administration](#), and [programmatic](#) pitfalls in its IIJA work. We briefed EPA staff and potential IIJA contractors and grantees on how to identify fraud. In addition to our deterrence efforts, we laid the groundwork to detect waste, fraud, and abuse and to promote efficiency and economy as the bulk of the Agency's IIJA work plays out over the ensuing years. We created IIJA-specific directorates within our Offices of Audit, Investigations, and Special Review and Evaluation, and we planned for and initiated additional IIJA oversight work, such as an [analysis](#) of how the EPA has managed programs funded by previous special appropriations. We crafted a strategy to directly and proactively work with states and other IIJA grantees and contractors, as well as to share IIJA-related information with our federal, state, and local oversight colleagues. Ultimately, we aim to be faithful stewards of the IIJA funds entrusted to us to perform oversight, and we are committed to doing the same for the EPA as it implements its IIJA programming.

***Oversight of Environmental Emergencies.*** By its very nature, oversight work tends to be reactive, but effective oversight is also timely and proactive. Over the last year, my office quickly sprang into action to provide effective oversight of several environmental emergencies. In August, as the recent drinking water emergency in Jackson, Mississippi, began to emerge, OIG staff was on-site, conducting interviews. Shortly thereafter, we initiated an official [inquiry](#). Another previously implemented [inquiry](#) spurred an [evaluation](#) into the Pearl Harbor drinking water contamination, with fieldwork culminating this semiannual reporting period. In May 2022, we published a follow-up [report](#) regarding the EPA's response to the water crisis in Flint, Michigan; the report details that the Agency did not fully address three of our original recommendations, which means public health is still at risk from lead in drinking water. We also continued our [audit](#) of lead contamination in the water supply for Benton Harbor, Michigan, to determine whether the EPA followed its policy on elevating critical public health issues.

***The Power of Oversight.*** Our oversight work continues to have real-life impacts to improve Agency programs and operations. In this semiannual reporting period, our Office of Special Review and Evaluation [examined](#) how the EPA did not follow its procedures when assessing the cancer risk of the 1,3-Dichloropropene agricultural pesticide, and we issued recommendations to not only increase the transparency of the 1,3-Dichloropropene registration but also ensure that the Agency maintains scientific credibility and transparency for future pesticide registrations. Using a multidisciplinary approach, our Administrative Investigations Directorate [analyzed](#), in an expedited project, how the CSB's operations are hindered by vacancies in mission-critical positions and by unclear internal processes. While we did not issue any recommendations in the resulting report, we offered seven considerations for the CSB as it develops a new strategic plan. And our Office of Audit culminated the fiscal year with an approximate \$65 million return on investment. In this semiannual reporting period, for instance, we [identified](#) that the Agency may not have reported approximately \$10.3 million in improper payments—of which approximately \$8.6 million may be subject to recovery—because it did not apply the cost-allowance principles in the review of grants payments.






Although primarily focused on criminal or civil matters, the work performed by our Office of Investigations has implications far beyond the courtroom. A recent investigation resulted in a project manager for an EPA contractor pleading guilty in July 2022 to making misleading statements about the status of lead contamination at a city park near the Newton County Superfund Site in Granby, Missouri. Not only did our investigators play an integral part in identifying the criminal activity, they discovered further contamination that threatened the health of Granby residents. As a result, EPA Region 7 had to hire another contractor to perform an emergency remedial action.

**Whistleblower Outreach.** Whistleblowers shine a powerful light on potential fraud, waste, and abuse that may otherwise remain hidden. For this reason, we continued our outreach to EPA and CSB staff regarding whistleblowing during this semiannual reporting period. For example, we observed July’s [National Whistleblower Appreciation Day](#) with our second annual slate of outreach activities, including holding a virtual panel with more than 1,000 attendees and producing a [video](#) about whistleblower protections.

**Meeting Our Mission, Overcoming Challenges.** The OIG continues to face significant challenges owing to a decade or more of flat or declining annual appropriations, requiring us to make difficult choices between investing in our staff or in our administrative and technological infrastructure. As discussed below, in choosing the former and relying on the Agency for the latter, we have placed our independence at risk. For example, during this reporting period, we discovered that an Agency employee was granted access to our Whistleblower Protection Coordinator email account. We are meeting this challenge the only way we can, by investing in our staff. To put executive-level focus on these and other issues facing the OIG, we have elevated the OIG’s information technology director to a senior executive position and flattened the reporting structure for all senior executives.

As always, our goal is—through efficient internal operations that effectively support significant audits, evaluations, and investigations—to be a premier oversight agency. We are proud of the work we have done and will continue to do to help improve the Agency’s programs and operations and to ensure responsible stewardship of American tax dollars.

  
 Sean W. O'Donnell  
 Inspector General

# Table of Contents

<b>Section 1: Overview .....</b>	<b>1</b>
1.1 About the EPA, the CSB, and the OIG .....	2
1.2 OIG Strategic Planning .....	3
1.3 Analysis of Unimplemented Recommendations .....	5
1.4 OIG Hotline .....	7
1.5 Scientific Integrity and Misconduct.....	9
1.6 Congressional and Legislative Activity .....	11
<b>Section 2: Work Accomplished During the Semiannual Period.....</b>	<b>12</b>
2.1 Oversight Work .....	13
Congressional Requests .....	13
Coronavirus Pandemic .....	14
Infrastructure Investment and Jobs Act .....	15
Human Health and Environmental Issues .....	17
Business Practices and Accountability .....	20
Hotline Contacts.....	23
U.S. Chemical Safety and Hazard Investigation Board .....	25
2.2 Investigative Work.....	26
2.3 Instances of Whistleblower Retaliation and Interference with Independence .....	29
2.4 Single Audit Work.....	30
<b>Section 3: Statistical Data .....</b>	<b>31</b>
3.1 Audit Report Resolution .....	32
3.2 Summary of Investigative Results.....	33
<b>Appendixes .....</b>	<b>35</b>
1—Reports Issued .....	36
2—Delayed EPA Management Decisions and Comments; Management Decisions with Which the OIG Disagrees .....	38
3—Reports with Corrective Action Not Completed .....	42
4—Closed Investigations Involving Senior Employees .....	57
5—Peer Reviews Conducted .....	58
6—OIG Mailing Addresses and Telephone Numbers .....	59

# SECTION 1: OVERVIEW



## 1.1 About the EPA, the CSB, and the OIG

### ***The U.S. Environmental Protection Agency***

The mission of the U.S. Environmental Protection Agency is to protect human health and the environment. As America's steward for the environment since 1970, the EPA has endeavored to ensure that the public has air that is safe to breathe, water that is clean and safe to drink, food that is free from dangerous pesticide residues, and communities that are protected from toxic chemicals.

### ***The U.S. Chemical Safety and Hazard Investigation Board***

The U.S. Chemical Safety and Hazard Investigation Board was created by the Clean Air Act Amendments of 1990. The CSB's mission is to investigate accidental chemical releases at facilities, report the root causes to the public, and recommend measures to prevent future occurrences.

### ***The EPA Office of Inspector General***

The Office of Inspector General, established by the Inspector General Act of 1978, as amended, 5 U.S.C. app., is an independent office of the EPA that detects and prevents fraud, waste, and abuse to help the Agency protect human health and the environment more efficiently and effectively. Since fiscal year 2004, Congress has designated the EPA inspector general to also serve as the inspector general for the CSB. As a result, the EPA OIG has the responsibility to audit, evaluate, inspect, and investigate EPA and CSB programs and operations, as well as to review proposed laws and regulations to determine their potential impact on these programs and operations. OIG staff are based at EPA headquarters in Washington, D.C.; at the EPA's ten regional offices; in Research Triangle Park, North Carolina; and in Cincinnati, Ohio.

### **OIG Vision**

Be a premier oversight organization trusted to speak the truth, promote good governance, and contribute to improved human health and environment.





### **OIG Mission**

Conduct independent audits, evaluations, and investigations; make evidence-based recommendations to promote economy, efficiency, and effectiveness; and prevent and detect fraud, waste, abuse, mismanagement, and misconduct for the EPA and the CSB.

### **OIG Goals**

1. Contribute to improved EPA and CSB programs and operations protecting human health and the environment and enhancing safety.
2. Conduct audits, evaluations, and investigations that enable the EPA and the CSB to improve business practices and accountability.
3. Improve OIG processes, resource allocation, and accountability to meet stakeholder needs.

## 1.2 OIG Strategic Planning

When determining which audits and evaluations to undertake, the OIG independently considers the top management and performance challenges facing the EPA and the CSB. In this semiannual report, we identify which top management challenges our audits and evaluations address, as applicable, next to the following symbol: . We also consider how our oversight work supports the EPA's mission-related efforts to protect human health and the environment. We show which mission-related efforts our reports support next to this symbol: . Some of the work we conduct is required by law or executive order; those reports are labeled with the following symbol: . We also, as part of our oversight function, may verify proper implementation of EPA and CSB corrective actions via follow-up audits and evaluations. We identify such follow-up projects with the following symbol: .

### Agency Management Challenges

EPA FY 2022 report [issued](#) November 12, 2021; FY 2023 report under development

CSB FY 2022 report [issued](#) November 10, 2021; FY 2023 report under development

#### EPA FY 2022 Management Challenges

1. Mitigating the causes and adapting to impacts of climate change.
2. Integrating and leading environmental justice, including communicating risks.
3. Ensuring safe use of chemicals.
4. Safeguarding scientific integrity.
5. Protecting information technology and systems against cyberthreats.
6. Managing infrastructure funding and business operations.
7. Enforcing environmental laws and regulations.

#### CSB FY 2022 Management Challenge

1. Accomplishment of CSB mission is impaired until new board members are selected.

In accordance with the Reports Consolidation Act of 2000, each OIG is required to prepare an annual report summarizing what the inspector general considers to be the “most serious management and performance challenges facing the agency.” To identify the EPA's top management challenges, we consider the OIG's body of work, survey EPA program offices, solicit senior EPA leadership input, and hold outreach meetings with the Agency's program offices. We also consider the work of the U.S. Government Accountability Office and public statements by EPA leaders to the press and Congress.

Based on this feedback, we identified seven top management challenges facing the EPA in FY 2022. We used audit, evaluation, and other analyses of CSB operations to formulate one top management challenge facing the CSB in FY 2022.

During the second half of FY 2022, we worked to identify the top management challenges that the EPA and the CSB will face in FY 2023. We expect to publish our FY 2023 top management

challenges reports on our “Top Management Challenges for EPA and CSB” [webpage](#) in the next semiannual reporting period.

### Oversight Plan

FY 2022 plan [issued](#) December 16, 2021; FY 2023 plan under development

Our oversight plans reflect the priority work that the OIG believes is necessary to keep the EPA, the CSB, Congress, and the American people fully informed about problems and deficiencies relating to the administration of Agency programs and operations. These documents list, by management challenge, our planned and ongoing oversight projects and guide us in fulfilling our critically important mission to detect and deter fraud, waste, and abuse in EPA and CSB programs and operations; to improve the efficiency and effectiveness of the EPA and the CSB; and to help ensure ethical conduct throughout the EPA and the CSB. It is also important to note that our plans are not static; the projects included may be modified throughout the year as new challenges and risks emerge for the EPA and the CSB. We expect to publish our FY 2023 oversight plan on our “OIG Planning Documents” [webpage](#) in the next semiannual reporting period.



## ***Infrastructure Investment and Jobs Act Oversight Plan***

[Issued](#) April 29, 2022

The Infrastructure Investment and Jobs Act, or IIJA, provides the EPA with approximately \$60 billion for infrastructure-related purposes, including geographic programs, state and tribal assistance grants targeting clean-water initiatives, brownfields, Superfund, pollution, and recycling. The funds will be distributed to the EPA over five years, from FYs 2022 through 2026, and the majority of the EPA's IIJA funding is available until expended.

The EPA OIG will receive nearly \$270 million in IIJA funds to be distributed over the same five fiscal years. These funds, the majority of which also do not expire, will allow us to oversee the EPA's execution of IIJA programming for over ten years. The primary goal of our IIJA oversight is to perform our mission to detect and prevent fraud, waste, and abuse of the IIJA resources entrusted to the Agency, its grantees, and its contractors.

Our *IIJA Oversight Plan* will guide our audits, evaluations, and oversight engagements to address the EPA programs receiving or impacted by IIJA funds. As the Agency refines its plans to execute the IIJA, we will refine our *IIJA Oversight Plan*.

## ***The OIG's FY 2023–2027 Strategic Plan***

Under development

In this semiannual report period, we began the process of developing the next iteration of our strategic plan, since our current [strategic plan](#) is set to expire at the end FY 2023. The new strategic plan will document the inspector general's five-year vision and the OIG's mission.

## 1.3 Analysis of Unimplemented Recommendations

OIG audits and evaluations provide recommendations to improve EPA or CSB programs and operations. The EPA, the CSB, and the public benefit from the implementation of these recommendations, which address a range of human health, environmental, and business issues. Twice per year, we will issue a [compendium](#) that provides an in-depth analysis of the open and unresolved recommendations issued by the OIG to the EPA and the CSB.

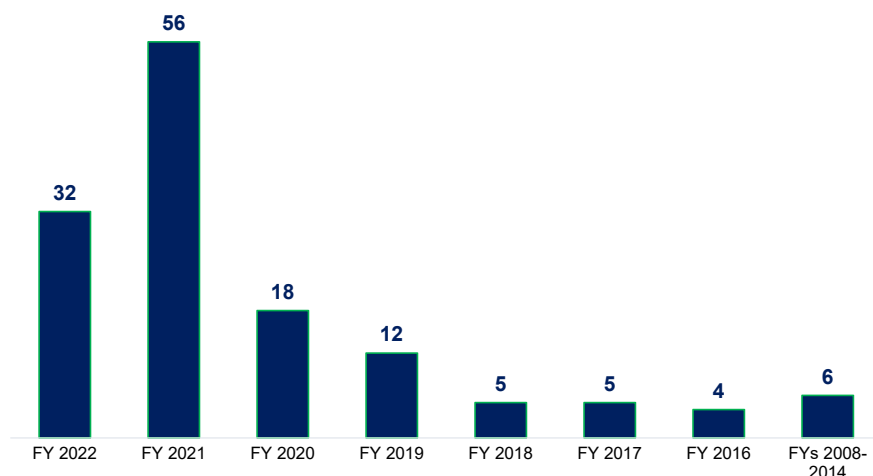
Before issuing a final report that contains recommendations, the OIG distributes a draft report to the EPA or the CSB, identifying a lead official for each recommendation included in the report. The lead officials can then respond to the draft report findings and recommendations. For the final report, which is posted on the OIG's website, the OIG analyzes the responses received and indicates whether each recommendation is:

- **Unresolved.** The EPA or the CSB disagrees with the recommendation or did not provide a formal, complete written response to the recommendation, or the OIG disagrees that the Agency's proposed corrective actions are responsive to the recommendation. Recommendations that remain unresolved six months after the final report is issued are listed in [Appendix 2](#).
- **Resolved.** The EPA or the CSB and the OIG agree upon the recommendation and proposed corrective actions, but the corrective actions have not yet been completed. These recommendations are also called open recommendations and are considered unimplemented, regardless of whether their expected due dates are in the past or the future. Unimplemented recommendations issued prior to this semiannual reporting period are listed in [Appendix 3](#).
- **Completed.** The EPA or the CSB and the OIG agree upon the recommendation and proposed corrective actions, and the EPA or the CSB has fully completed them.

Section 5(a)(3) of the Inspector General Act requires that we identify each significant recommendation described in previous semiannual reports for which corrective action has not been completed. For this semiannual report, we analyzed actions taken by the EPA and the CSB regarding recommendations described in past semiannual reports and identified those that remained unimplemented as of September 30, 2022: 134 for the EPA and four for the CSB. The chart below shows when these 138 unimplemented recommendations were originally issued to the EPA or the CSB. The potential monetary benefits of the

134 recommendations issued to the EPA are approximately \$75.9 million. There are no potential monetary benefits associated with the unimplemented CSB recommendations. Note that the recommendations issued during this semiannual period are included as part of the report summaries in [Section 2.1](#).

Number of unimplemented recommendations by fiscal year issued



The table below breaks down the 138 unimplemented recommendations issued to the EPA and the CSB according to their potential health, environmental, and business benefits and identifies the potential monetary benefits to be gained if these recommendations are implemented. [Appendix 3](#) provides the full text of the unimplemented recommendations.

Category	Number remaining unimplemented	Potential monetary benefits associated with unimplemented recommendations
<b><i>EPA unimplemented recommendations</i></b>		
1. Administrative and Business Operations	48	\$48,065,000
2. Human Health and Environmental Issues	86	\$27,800,000
<b>EPA subtotal</b>	<b>134</b>	<b>\$75,865,000</b>
<b><i>CSB unimplemented recommendations</i></b>		
1. Management and Operations	4	\$0
<b>CSB subtotal</b>	<b>4</b>	<b>\$0</b>
<b>TOTAL</b>	<b>138</b>	<b>\$75,865,000</b>

## 1.4 OIG Hotline

Section 8M of the Inspector General Act requires each OIG to maintain a direct link on the homepage of its website for individuals to report fraud, waste, and abuse. Individuals may also report complaints to the EPA OIG via telephone, email, and postal mail. We refer to these means of receiving information collectively as the “OIG Hotline.” The purpose of the hotline is to receive complaints of fraud, waste, or abuse in EPA and CSB programs and operations, including mismanagement or violations of laws, rules, or regulations by Agency employees or program participants. The hotline also encourages suggestions for assessing the efficiency and effectiveness of Agency programs. Complaints and suggestions may be submitted by anyone, including EPA and CSB employees, participants in EPA and CSB programs, Congress, organizations, and the public. As a result of these contacts, the OIG may conduct audits, evaluations, and investigations. In [Section 2.1](#), we summarize the work based on hotline contacts concluded during this semiannual reporting period.

### Hotline Statistics

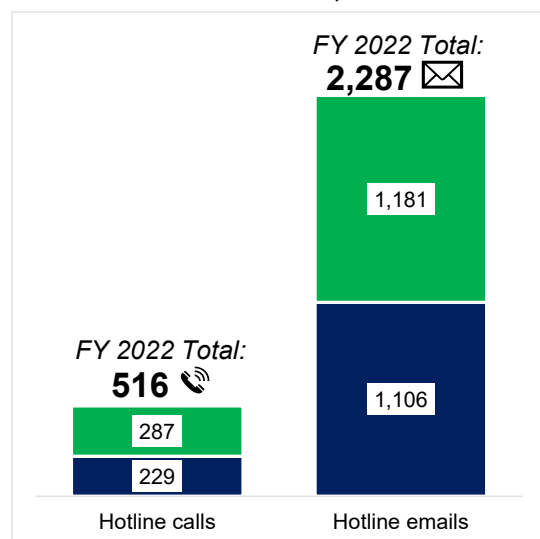
The figures below detail the number and types of contacts that the hotline received and referred for review by OIG investigation, audit, and evaluation staff; EPA program offices; and other government agencies during the semiannual period ending September 30, 2022. In this period, of 2,803 contacts received, the OIG made 548 referrals. A contact can be referred to more than one entity.

We refer complaints related to the OIG’s oversight goals and mission to internal OIG offices to consider for action. We refer contacts unrelated to potential fraud, waste, abuse, misconduct, or mismanagement but related to an Agency program or operation to the appropriate EPA or CSB office. As applicable, we attempt to refer contacts unrelated to the EPA or the CSB to another government agency. More information about our hotline operations, including a podcast that discusses how the EPA OIG hotline works, who uses it, and how to file a hotline complaint, can be found on our [website](#).

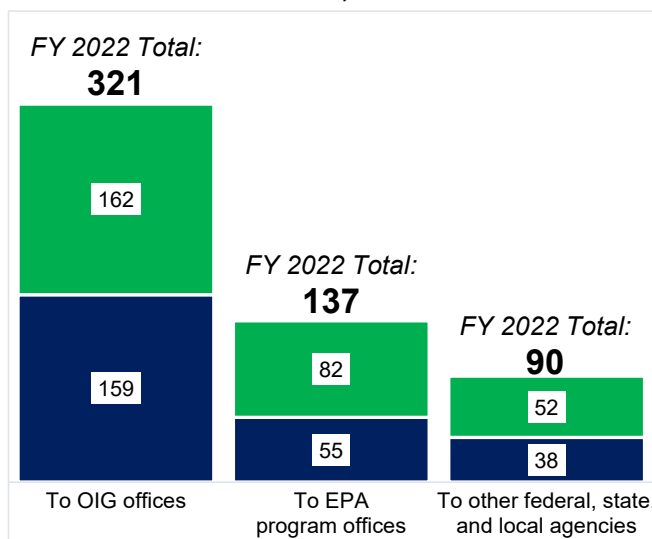
[Podcast](#)



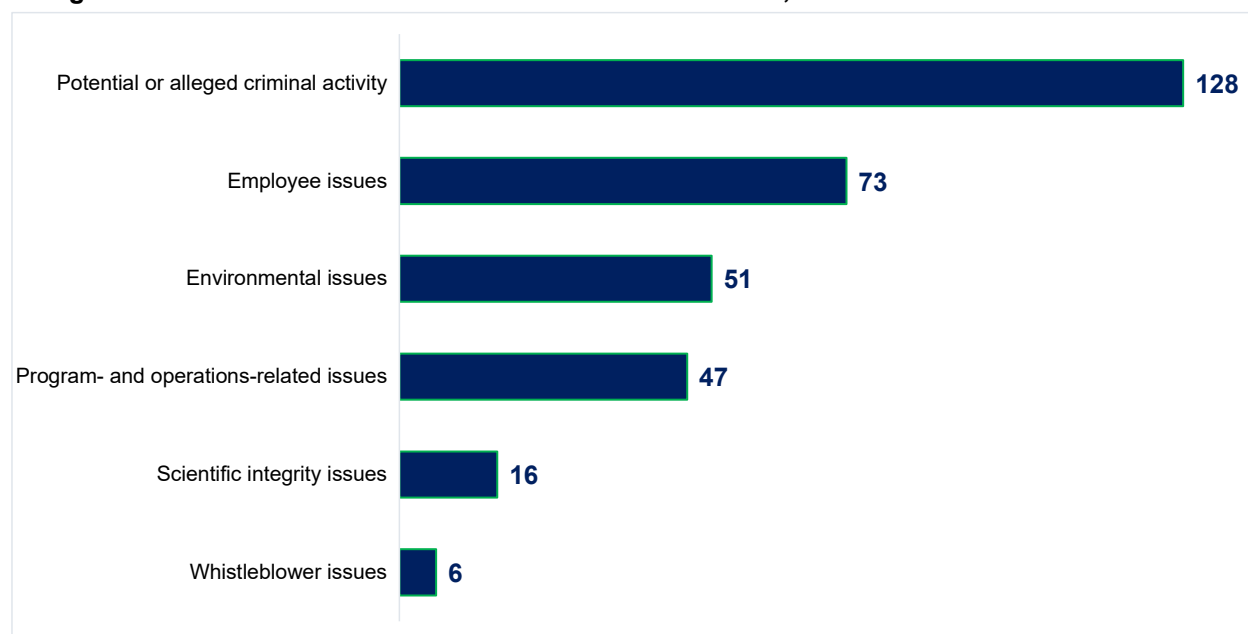
Hotline contacts received, FY 2022



Hotline contacts referred, FY 2022



■ 10/1/21–3/31/22 semiannual reporting period ■ 4/1/22–9/30/22 semiannual reporting period

**Categories of the 321 hotline contacts referred to OIG offices, FY 2022*****Hotline Confidentiality***

Individuals who contact the hotline are not required to identify themselves and may request confidentiality when submitting allegations. However, the OIG encourages those who report allegations to identify themselves so that they can be contacted if the OIG has additional questions. Pursuant to section 7 of the Inspector General Act, the OIG will not disclose the identity of an EPA or CSB employee who provides information unless that employee consents or the inspector general determines that such disclosure is unavoidable during the course of an investigation. As a matter of policy, the OIG will provide comparable protection to employees of contractors, grantees, and others who make a complaint or provide information to the OIG and request confidentiality. Pursuant to section 8M of the Inspector General Act, the OIG will also not disclose the identity of an individual who provides information via the OIG's online complaint form unless that individual consents or the inspector general determines that such disclosure is unavoidable during the course of an investigation. This applies regardless of whether the individual is an EPA or CSB employee. Individuals concerned about confidentiality or anonymity with regard to electronic communication may submit allegations by telephone or regular mail.

**EPA OIG Hotline**

To report fraud, waste, or abuse, contact us through one of the following methods:

Email: [OIG\\_Hotline@epa.gov](mailto:OIG_Hotline@epa.gov)  
 Phone: (888) 546-8740 or (202) 566-2476  
 Online: [EPA OIG Hotline](#)

Mail: EPA OIG Hotline  
 1200 Pennsylvania Avenue, NW  
 Mail Code 2410T  
 Washington, D.C. 20460

**EPA Whistleblower Protection Coordinator**

The EPA whistleblower protection coordinator can be reached at:

Phone: (202) 566-1513

Email: [whistleblower\\_protection@epa.gov](mailto:whistleblower_protection@epa.gov)



## 1.5 Scientific Integrity and Misconduct

Scientific integrity at the EPA helps ensure that the science conducted, communicated, and used across the Agency is of the highest quality. Scientific integrity is crucial because it safeguards science to ensure that it is objective and rigorous. In November 2021, the OIG identified “Safeguarding Scientific Integrity Principles” as a [top management challenge](#) for the EPA. The EPA issued its *Scientific Integrity Policy* in February 2012. The policy sets the expectation for all EPA employees to represent the Agency’s scientific activities clearly, accurately, honestly, objectively, thoroughly, without political or other interference, and in a timely manner, consistent with their official responsibilities. It also sets the expectation that all EPA employees will report policy breaches. The EPA’s Scientific Integrity Program consists of the EPA’s scientific integrity official, deputy scientific integrity officials from each of the EPA’s program and regional offices, and program staff who support implementing the *Scientific Integrity Policy*.

“Science is the backbone of the EPA’s decision-making. The Agency’s ability to pursue its mission to protect human health and the environment depends upon the integrity of the science on which it relies. The environmental policies, decisions, guidance, and regulations that impact the lives of all Americans every day must be grounded, at a most fundamental level, in sound, high quality science.”

—[Scientific Integrity Policy](#), Section II

As part of its mission to detect and deter fraud, waste, abuse, and mismanagement, the OIG conducts investigations related to “research misconduct” and “scientific misconduct,” including fabrication, falsification, or plagiarism in proposing, performing, or reviewing research or reporting research results. The OIG may refer scientific integrity allegations that it receives to the scientific integrity official. The scientific integrity official and OIG staff meet every two weeks to discuss the status of cases, as appropriate, as well as other scientific integrity-related issues.

The OIG has a critical role in protecting the Agency’s scientific integrity. As an independent office, the OIG can receive complaints of mismanagement, misconduct, abuse of authority, or censorship, including those related to scientific or research misconduct. Through its statutory mandate, the OIG can investigate these allegations. To facilitate transparency, we continue our practice, started in our fall 2020 *Semiannual Report to Congress*, of providing a summary of scientific integrity oversight at the Agency. The following subsections report the status of scientific integrity allegations received by the scientific integrity official and scientific misconduct allegations received by the OIG.

### ***Scientific Integrity Allegations and Advice Queries Received by the Scientific Integrity Official***

The EPA’s Scientific Integrity Program engages with Agency staff who raise potential scientific integrity concerns through two mechanisms: (1) advice and assistance to provide early intervention for the purpose of preventing lapses in scientific integrity and (2) a procedure for reporting and adjudicating allegations.

For the semiannual reporting period ending September 30, 2022, the scientific integrity official reported that the Scientific Integrity Program received no new allegations and 29 new advice queries. Also during this semiannual reporting period, no allegations were closed or resolved. As of September 30, 2022, there were 24 open allegations, all from prior reporting periods.

### ***Scientific Misconduct Allegations Received and Investigated by the OIG***

At the beginning of the semiannual reporting period, the OIG had ten open cases involving potential scientific misconduct. The OIG received seven complaints with allegations involving potential scientific misconduct from Agency employees and other sources during this semiannual reporting period. Three of

these complaints resulted in new investigations. As of September 30, 2022, three investigations were closed. The OIG did not have any relevant results of investigations that it conducted or oversaw to report to the Agency for a determination of appropriate action.

[EPA Order 3120.5](#) contains the Agency's policy and procedures for addressing research misconduct, including the requirement for EPA employees to immediately report to the OIG any allegation of research misconduct that involves:

- Public health or safety being at risk.
- Agency resources or interests being threatened.
- Circumstances in which research activities should be suspended.
- Reasonable indication of possible violations of civil or criminal law.
- Federal action being required to protect the interests of those involved in an investigation.
- A research entity's belief that an inquiry or investigation may be made public prematurely, so that appropriate steps can be taken to safeguard evidence and protect the rights of those involved.
- Circumstances in which the research community or public should be informed.

Additionally, EPA Manual 6500, *Functions and Activities of the Office of Inspector General*, states, "Each employee is responsible for promptly reporting indications of wrongdoing or irregularity to the OIG and for cooperating and providing assistance during any audit or investigation." [Coordination procedures](#) between the scientific integrity official and the OIG state that upon receiving a research misconduct allegation, the scientific integrity official will refer the allegation to the OIG Hotline. Likewise, if the OIG receives an allegation of research misconduct through means other than the OIG Hotline, the allegation will be forwarded to the OIG Hotline, and OIG staff will contact the scientific integrity official to discuss the allegation, as appropriate. As noted above, the scientific integrity official and OIG staff also meet every two weeks to discuss the status of cases, as appropriate, as well as other scientific integrity-related issues.

Requests for advice or allegations received by the scientific integrity official are not always referred to the OIG. In FY 2022, the OIG initiated discussions with the Agency to revise the coordination procedures between the OIG and the Agency's Scientific Integrity Program related to information sharing on scientific integrity. Despite the OIG's efforts, these revisions have yet to be finalized. Revised coordination procedures are essential to clarify the OIG's access rights and ensure that scientific integrity concerns are routed to the proper office and addressed in the most efficient and effective manner.

## 1.6 Congressional and Legislative Activity

### ***Briefings, Requests, and Inquiries***

During this reporting period, the OIG provided 15 briefings to congressional members and staff on the OIG's oversight work. These briefings allowed the inspector general and OIG staff to better understand congressional perspectives, provide information about the OIG, and establish the foundation for an open dialogue. They also served as an opportunity for the OIG to highlight the need for increased oversight of the EPA and the CSB. The briefings included discussions regarding recent, ongoing, and future OIG work, including the OIG's *IIJA Oversight Plan*; the EPA's response to the drinking water lead contamination in Benton Harbor, Michigan; and the OIG's inquiry into the Jackson, Mississippi, drinking water emergency. During this reporting period, the OIG received one congressional request.

### ***Legislation and Regulations Reviewed***

Section 4(a) of the Inspector General Act requires the inspector general to review existing and proposed legislation and regulations relating to the programs and operations of the EPA and the CSB, as well as to make recommendations concerning their potential impact. We also review drafts of Office of Management and Budget circulars, memorandums, executive orders, program operations manuals, directives, and reorganizations. The primary bases for any recommendations and comments we make are the audit, evaluation, investigation, and legislative experiences of the OIG, as well as our participation on the Council of the Inspectors General on Integrity and Efficiency. During the semiannual reporting period ending September 30, 2022, we reviewed proposed changes to legislation, regulations, policy, procedures, or other documents that could affect the EPA, the CSB, or the OIG. We provided recommendations or comments on proposed legislation related to inspector general appointment limitations and investigative briefings to Congress.

## SECTION 2:

### *Work Accomplished During the Semiannual Period*




## 2.1 Oversight Work


### Congressional Requests

Because of limited and diminishing resources, each time the OIG receives a request from Congress to undertake discretionary work, we must consider whether we have the capacity to conduct our work in a timely fashion and whether undertaking the requested work would preclude our doing other crucial work. We must also consider the many OIG projects that are statutorily mandated. For every requested review that the OIG decides to undertake, there will be discretionary projects that we cannot. We therefore must make difficult decisions about whether to initiate work requested by Congress. In the semiannual period ending September 30, 2022, we published one report based on congressionally requested work.

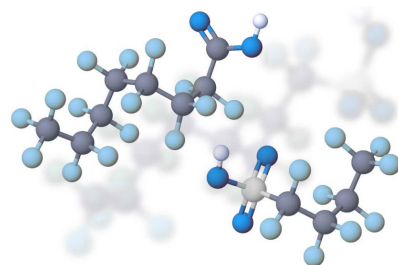
#### ***The EPA Was Not Transparent About Changes Made to a Long-Chain PFAS Rule After Administrator Signature***

Report No. [22-E-0052](#), issued July 7, 2022

 Ensuring the safety of chemicals.

 Ensuring safe use of chemicals.

The EPA did not follow all applicable policies, procedures, and guidance when making changes to the Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances Significant New Use Rule after the administrator signed it and before it was published in the Federal Register. The substances in question are types of per- and polyfluoroalkyl substances, or PFAS, which are manufactured chemicals widely used in industry and consumer products. By not following all docketing procedures, the EPA did not meet transparency expectations and risked compromising the public's trust in the rulemaking process. However, the Agency followed the Office of the Federal Register's *Document Drafting Handbook* guidance for requesting changes to the final rule.



Visual representation of the chemical formulation of PFAS. (EPA image from the February 2019 EPA's Per- and Polyfluoroalkyl Substances (PFAS) Action Plan)

#### ***Recommendation for corrective action issued to the assistant administrator for Chemical Safety and Pollution Prevention:***

- 1 Update the docket for the Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances Significant New Use Rule by posting the decision memorandum, *Corrections to the Final Rule for Long-Chain Perfluoroalkyl Carboxylate and Perfluoroalkyl Sulfonate Chemical Substances; Significant New Use Rule (Tier 3; SAN 5684; RIN 2070-AJ99; FRL10010-44; EPA-HQ-OPPT-20 13-0225) - DECISION MEMORANDUM*, which outlines the changes made to the final rule after the EPA administrator signed it but before it was published in the *Federal Register*.

#### ***Recommendations for corrective action issued to the assistant administrator for Policy:***

- 2 Update *Creating and Managing Dockets: Frequently Asked Questions for EPA Action Developers (Docketing FAQs)*, dated October 2011, and other applicable policies, procedures, and guidance as needed to require the docketing of decision memorandums that outline substantive changes made to a final rule after the EPA administrator signs it but before it is published in the *Federal Register*.
- 3 Update applicable policies, procedures, and guidance as needed to require that—when the EPA makes changes to a regulatory action as a result of a suggestion or recommendation received from the Office of Information and Regulatory Affairs between the time the action is submitted to the Office of Information and Regulatory Affairs for review and the time the action is published in the *Federal Register*—the EPA identify those changes for the public, consistent with Executive Order 12866 section 6(a)(3)(E)(iii).




## Coronavirus Pandemic

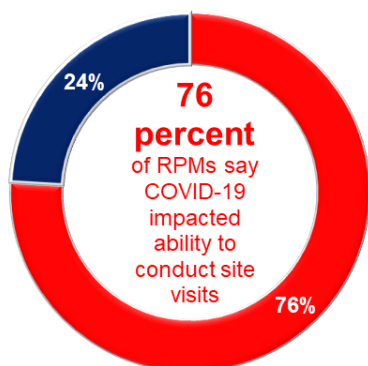
### Report Related to the EPA's Pandemic Responses

#### ***The Coronavirus Pandemic Caused Schedule Delays, Human Health Impacts, and Limited Oversight at Superfund National Priorities List Sites***

Report No. [22-E-0049](#), issued June 23, 2022

 *Cleaning up and revitalizing land.*

 *Integrating and leading environmental justice, including communicating risks.*



Note: RPM = Remedial Project Manager.  
Source: OIG analysis of 245 RPM responses to OIG survey. (EPA OIG image)

The coronavirus pandemic caused schedule delays and changed or extended exposures to hazardous substances, pollutants, or contaminants at 31 Superfund National Priorities List sites. The pandemic also contributed to disproportionate impacts on some communities, as well as prevented some communities that lacked electronic communications from participating in the Superfund community-involvement activities required during the cleanup process. The EPA's remedial project managers said that their oversight of site work was limited, in part, by the Agency's pandemic-related restrictions and by the burdensome, undocumented approval process for coronavirus testing and supplies. The pandemic did steer some positive changes, such as improved health and safety protocols, increased community participation in virtual meetings, and reduced EPA travel costs.

#### ***Recommendations for corrective action issued to the assistant administrator for Land and Emergency Management:***

- 1 Develop and implement a plan to conduct outreach meetings in the communities where meetings did not occur during the pandemic because they either lacked or do not use virtual technologies.
- 2 Promptly develop and implement guidance regarding how oversight should be conducted for Superfund sites when travel or site access is limited.

#### ***Recommendation for corrective action issued to the deputy administrator:***

- 3 In coordination with the assistant administrator for Mission Support and the assistant administrator for Land and Emergency Management, promptly develop and implement a policy to provide the necessary tools—such as appropriate testing, vaccination, and supplies—to safely deploy remedial project managers during a pandemic or other emergency

### Investigations Related to the Pandemic

The Office of Investigations opened a number of cases to investigate allegations of fraud related to the coronavirus pandemic. Allegations investigated included schemes to defraud the public through the misuse of the EPA logo or seal and products that failed to perform as advertised. Two pandemic-related investigations were closed during the semiannual reporting period. One allegation was supported, while the other was not.

### OIG's Webpage: "EPA OIG's Response to the COVID-19 Pandemic"

[Launched](#) May 2020, continually updated

To ensure transparency and keep the public up to date on our efforts, we maintain a webpage of our work related to the pandemic. This page lists potential audit or evaluation topics, recently announced projects, potential investigation targets, and issued reports.



## Infrastructure Investment and Jobs Act

On November 15, 2021, President Joseph R. Biden Jr. signed the IIJA, Pub. L. 117-58, into law. This Act appropriated a total of approximately \$60 billion to the EPA for FYs 2022 through 2026, a significant increase from the EPA's typical annual appropriations, which have ranged from approximately \$8 billion to \$9.4 billion over the past ten years. The OIG will receive nearly \$270 million of those funds to conduct audits, evaluations, and investigations of EPA programs receiving or affected by IIJA funds.

In accordance with our *IIJA Oversight Plan*, in fiscal year 2022, we focused on helping the EPA plan for the significant increase in IIJA funding by issuing three “lessons-learned” reports. As detailed below, these reports aimed to help the Agency avoid historical pitfalls while implementing its responsibilities under the IIJA.

### Considerations from Single Audit Reports for the EPA's Administration of Infrastructure Investment and Jobs Act Funds

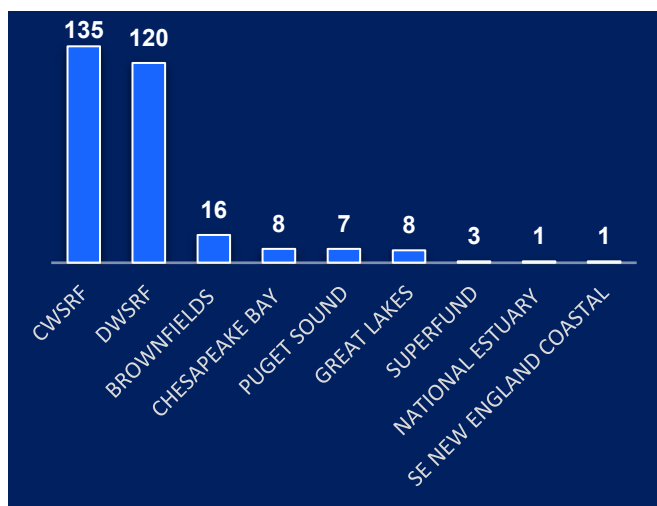
Report No. [22-N-0057](#), issued September 14, 2022

 *Compliance with the law; Partnering with states and other stakeholders; Operating efficiently and effectively.*  
 *Managing infrastructure funding and business operations.*

Our review of single audits conducted from FYs 2019 through 2021 analyzed findings of noncompliance with federal grant award requirements within nine EPA programs that are expected to receive IIJA funding. Instances of noncompliance occurred most frequently in these seven areas: Procurement and Suspension and Debarment, Reporting, Allowable Costs/Cost Principles, Cash Management, Activities Allowable or Unallowable, Special Tests and Provisions, and Subrecipient Monitoring. Most instances of noncompliance were associated with the Clean Water State Revolving Fund program and the Drinking Water State Revolving Fund program. As the EPA prepares to award IIJA funds to its external, nonfederal partners, the Agency should consider how it can address or prevent future instances of noncompliance in light of these findings. We did not issue any recommendations in this report.

#### What are single audits?

A nonfederal entity that expends \$750,000 or more in federal funds in a fiscal year is required to have an organizationwide audit conducted of its financial statements and federal programs. These audits are commonly referred to as **single audits** and are conducted by independent nonfederal auditors.



Instances of noncompliance with federal grant programs were identified in nine EPA programs expected to receive IIJA funds.

*Note:* CWSRF = Clean Water State Revolving Fund; DWSRF = Drinking Water State Revolving Fund

Source: OIG analysis of single audit reports. (EPA OIG image)

## Lessons Identified from Prior Oversight of the EPA's Geographic and National Estuary Programs

Report No. [22-E-0054](#), issued August 8, 2022

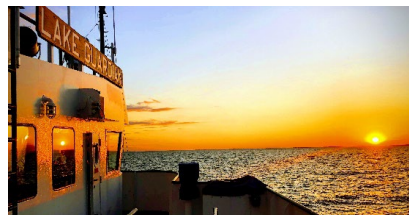


*Ensuring clean and safe water.*



*Managing infrastructure funding and business operations.*

We identified the following seven programmatic themes across 49 prior oversight reports related to the EPA's programs designed to protect regional waters: measurement of progress, communication, grant management, strategic planning, leadership, program execution, and resources. We detailed specific lessons under each theme for the EPA to consider as it expands its efforts to protect regional waters using IJA funding. We did not issue any recommendations in this report.



Great Lakes sunset on an EPA research vessel. (EPA photo)



We identified seven programmatic themes across the 49 EPA OIG and U.S. Government Accountability Office reports we reviewed. Source: OIG review. (EPA OIG image)

## Considerations for the EPA's Implementation of Grants Awarded Pursuant to the Infrastructure Investment and Jobs Act

Report No. [22-N-0055](#), issued August 11, 2022

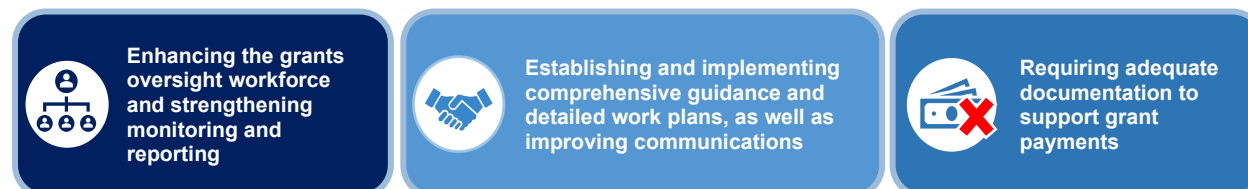


*Operating efficiently and effectively.*



*Managing infrastructure funding and business operations.*


We identified three broad areas for improvement in the EPA's administration and oversight of grants: enhancing the grants oversight workforce and strengthening monitoring and reporting; establishing and implementing comprehensive guidance and detailed work plans, as well as improving communications; and requiring adequate documentation to support grant payments. The Agency should consider addressing weaknesses in these areas to mitigate risks and reduce the likelihood of fraud, waste, and abuse as it administers and oversees more than \$55 billion of IJA funds slated for state and tribal grants. We did not issue any recommendations in this report.





The deficiencies we identified in the EPA's grant administration and oversight can be grouped into three broad areas. Source: OIG review of 22 OIG and Government Accountability Office audit reports. (EPA OIG image)

## Human Health and Environmental Issues

### ***The EPA Needs to Fully Address the OIG’s 2018 Flint Water Crisis Report Recommendations by Improving Controls, Training, and Risk Assessments***

Report No. [22-P-0046](#), issued May 17, 2022 

 Ensuring clean and safe water; Compliance with the law; Operating efficiently and effectively.

 Integrating and leading environmental justice, including communicating risks.

The EPA certified that it completed corrective actions to address all nine recommendations in OIG Report No. [18-P-0221](#), *Management Weaknesses Delayed Response to Flint Water Crisis*, issued July 19, 2018, but corrective actions for Recommendations 1, 6, and 8 did not fully address the identified deficiencies in oversight. Without effective oversight of the drinking water program, the public’s health is still at risk from lead in drinking water. We consider the corrective action for Recommendation 1 now complete. To fully address Recommendations 6 and 8, we made two new recommendations, which are resolved with corrective actions pending.

[Podcast](#)




Water treatment plant, Flint, Michigan. (EPA OIG image)

#### ***Recommendations for corrective action issued to the assistant administrator for Enforcement and Compliance Assurance:***

- |   |   |
|---|---|
| 1 | Document and monitor attendance at Safe Drinking Water Act training events to ensure the appropriate staff members, managers, and senior leaders attend the training and are aware of the EPA’s oversight and enforcement tools and authorities, including sections 1414 and 1431 of the Safe Drinking Water Act. |
| 2 | Incorporate controls into the Report a Violation system to assess the risks associated with tips retained by the EPA and to track when and how the retained tips are resolved.  |

## ***The EPA Continues to Fail to Meet Inspection Requirements for Hazardous Waste Treatment, Storage, and Disposal Facilities***

Report No. [22-E-0047](#), issued June 8, 2022 



*Compliance with the law.*



*Enforcing environmental laws and regulations.*

The EPA continues to not meet the statutory requirements for completing thorough inspections at all operating treatment, storage, and disposal facilities, which manage hazardous waste. If inspection rates do not meet statutory requirements, the EPA does not ensure compliance with the Resource Conservation and Recovery Act and may not be protecting human health and the environment. Nonetheless, inspection rates remain generally high. From FYs 2015 through 2021, the EPA completed 91 percent of the required inspections overall.

We conducted this follow-up evaluation to assess whether inspection rates of treatment, storage, and disposal facilities have changed since our 2016 report on the same topic: [OIG Report No. 16-P-0104, EPA Has Not Met Statutory Requirements for Hazardous Waste Treatment, Storage and Disposal Facility Inspections, but Inspection Rates Are High](#), issued March 11, 2016.



A treatment, storage, and disposal facility. (EPA image)

### ***Recommendation for corrective action issued to the assistant administrator for Enforcement and Compliance Assurance:***

- |   |   |
|---|---|
| 1 | Implement management controls to complete the required treatment, storage, and disposal facility inspections. |
|---|---|

## ***The EPA's Approval and Oversight of Water Infrastructure Finance and Innovation Act Loans Complied with Federal Law and Regulations***

Report No. [22-E-0048](#), issued June 22, 2022



*Operating efficiently and effectively; Ensuring clean and safe water.*



*Managing infrastructure funding and business operations.*

The EPA's policies and procedures provide reasonable assurance that loans issued under the Agency's Water Infrastructure Finance and Innovation Act program are awarded and monitored in accordance with federal and EPA requirements and that the program funding is used as intended to improve

The **Water Infrastructure Finance and Innovation Act of 2014** authorizes the EPA to provide direct loans and loan guarantees to eligible borrowers for the purpose of improving America's public water infrastructure.

America's public water infrastructure. As such, we concluded that the EPA has effectively acted to mitigate the program deficiencies identified in a previous OIG report: Report No. [19-P-0045, EPA's Water Infrastructure Finance and Innovation Act Program Needs Additional Internal Controls](#), issued December 14, 2018. We did not issue any recommendations in this report.



## ***Additional Internal Controls Would Improve the EPA's System for Electronic Disclosure of Environmental Violations***

Report No. [22-E-0051](#), issued June 30, 2022

 *Compliance with the law; Operating efficiently and effectively.*

 *Enforcing environmental laws and regulations.*

The EPA's electronic disclosure, or eDisclosure, system does not have adequate internal controls in place to ensure that the Agency's screening process for self-reported violations is effective and that significant concerns, such as criminal conduct and potential imminent hazards, are identified and addressed. Lacking formal, written national guidance or eDisclosure-specific training on how EPA staff should conduct screening or delineate staff responsibilities, most regions are inconsistently screening or not screening at all. The EPA does not have performance measures and does not systematically track eDisclosure system data. The system's reporting tool does not allow staff to use or track submissions effectively or robustly.




Source: OIG summary of screening process. (EPA OIG image)

### ***Recommendations for corrective action issued to the assistant administrator for Enforcement and Compliance Assurance:***


- 1 Develop national guidance that includes a process for screening eDisclosure submissions for significant concerns, such as criminal conduct and potential imminent hazards.
- 2 Provide eDisclosure-specific training to EPA headquarters and regions to clarify expectations, establish staff responsibilities, and communicate best practices.
- 3 Develop performance measures for the eDisclosure system and a monitoring plan to track its effectiveness.
- 4 In coordination with EPA regions, assess eDisclosure system functionality to identify and implement improvements.

## Business Practices and Accountability

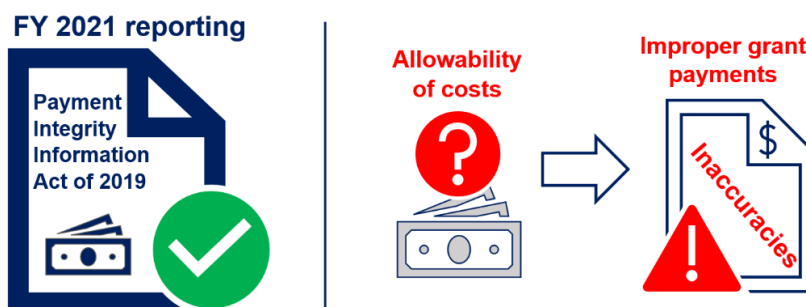
### The EPA Was Not Compliant with the Payment Integrity Information Act for Fiscal Year 2021

Report No. [22-P-0050](#), issued June 27, 2022 

 *Compliance with the law; Operating efficiently and effectively.*

 *Managing infrastructure funding and business operations.*

The EPA was not compliant with the Payment Integrity Information Act of 2019. The Agency did not adequately conclude, as required by the Office of Management and Budget, whether its programs with annual outlays greater than \$10 million were likely to make improper payments above or below the statutory threshold. The EPA's standard operating procedure governing risk assessments of improper payments with respect to the grants payment stream was not completed in time for the FY 2021 review, nor did the EPA establish an adequate methodology for determining risk-assessment attributes and results for the other payment streams. Thus, the Agency may not have reported approximately \$10.3 million in improper payments—of which approximately \$8.6 million may be subject to recovery. The Agency also cannot provide reasonable assurance that its payment streams are not susceptible to significant improper payments.



Payments for unallowable expenses are improper payment dollars. (EPA OIG image)

#### Recommendations for corrective action issued to the chief financial officer:

- 1 Review the OIG-identified questioned costs for the grants payment stream, determine the payment allowability, recover costs as appropriate, and recalculate the error rate.
- 2 Conduct an off-cycle risk assessment, applying the *Standard Operating Procedure Grants Improper Payment Review*, dated September 2021, and include the risk assessments in the Agency's *Fiscal Year 2023 Agency Financial Report*, ensuring that the risk assessments contain:
  - a. An assessment of all programs and activities with outlays greater than \$10 million.
  - b. An identification of which programs and activities with annual outlays exceeding the statutory threshold are included in each risk assessment.
  - c. A mechanism for identifying, accounting for, estimating, and reporting improper and unknown payments and for detailing efforts taken to prevent and reduce such payments.
- 3 For payment streams other than the grants payment stream, update the standard operating procedures so that they establish a sufficient methodology for programs and activities with outlays of more than \$10 million to adequately conclude whether they are susceptible to significant improper payments. The standard operating procedures should identify which programs or activities are included.
- 4 Periodically train Agency personnel on and provide completed course training certificates for:
  - a. The *Standard Operating Procedure Grants Improper Payment Review*, dated September 2021, which includes the *Payment Integrity Information Act Review Checklist*. Such training should include any updates to these documents and emphasize the application of the cost-allowance principles and adherence to the terms and conditions of federal awards.
  - b. All standard operating procedures, as well as any updates to them, implemented for other payment streams.

## ***The EPA Failed to Complete Corrective Actions as Certified to Address OIG Recommendations***

Report No. [22-N-0061](#), issued September 30, 2022

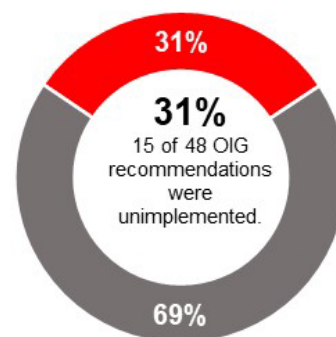


*Operating efficiently and effectively.*




*Enforcing environmental laws and regulations.*

Of the 48 recommendations issued in the seven prior OIG reports we reviewed, the Agency certified that corrective actions for 15 (roughly 31 percent) of them were completed, even though they had not been. Certifying that corrective actions have been completed when they have not leads to inaccurate data in the Agency's audit tracking system, limits the OIG's assurance that the corrective actions reported by the Agency are reliable, and may give the public and Congress the wrong impression regarding the EPA's progress in addressing OIG recommendations. We did not issue any recommendations in this report, but we did offer two considerations for the Agency: enhance and strengthen the recommendation follow-up process and require that the chief financial officer verify the completion of agreed-to corrective actions before submitting certification memorandums to the OIG.



OIG analysis of prior reports.  
(EPA OIG image)

## ***The EPA's Fiscal Years 2021 and 2020 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund***

Report No. [22-F-0059](#), issued September 26, 2022 




*Operating efficiently and effectively.*



*Managing infrastructure funding and business operations.*

We rendered an unmodified opinion on the EPA's FYs 2021 and 2020 financial statements for the Pesticides Reregistration and Expedited Processing Fund, also known as the Federal Insecticide, Fungicide, and Rodenticide Act Fund, meaning that the statements were fairly presented and free of material misstatement. We did not identify any noncompliance that would have a material effect on the audited financial statements. The Agency was also in compliance with statutory performance measures. We did not issue any recommendations in this report.

## ***The EPA's Fiscal Years 2021 and 2020 (Restated) Financial Statements for the Pesticide Registration Fund***

Report No. [22-F-0060](#), issued September 26, 2022 



*Operating efficiently and effectively.*



*Managing infrastructure funding and business operations.*




A tractor applies pesticides in a field. (EPA photo)

We rendered an unmodified opinion on the EPA's FYs 2021 and 2020 (restated) Pesticide Registration Fund financial statements, meaning that the statements were fairly presented and free of material misstatement. We did not identify any noncompliance that would have a material effect on the audited financial statements. The Agency was also in compliance with the statutory decision time review periods. We did not issue any recommendations in this report.

## ***The EPA's Fiscal Years 2021 and 2020 (Restated) Hazardous Waste Electronic Manifest System Fund Financial Statements***

Report No. [22-F-0062](#), issued September 30, 2022 

 *Operating efficiently and effectively.*

 *Managing infrastructure funding and business operations.*

We rendered a qualified opinion on the EPA's FYs 2021 and 2020 (restated) Hazardous Waste Electronic Manifest System Fund financial statements, meaning that, except for material errors in accounts receivable and earned revenue, the FY 2021 financial statements were fairly presented. We noted the following recurrent material weakness: the EPA needs to continue improving its internal controls over accounts receivable and earned revenue. Because of errors and discrepancies in EPA-provided billing data, we could not determine the level of use of the e-Manifest system or whether the Agency was collecting fees sufficient to cover the full cost of the program.



Basic steps for complying with hazardous waste regulations: (1) identify hazardous waste; (2) count the total weight of all hazardous waste; (3) notify the EPA or state agency of the hazardous waste activities; (4) manage the hazardous waste according to associated regulations; (5) transport hazardous waste off-site and have the required manifest tracked through the Hazardous Waste Electronic Manifest system; (6) recycle, treat, or dispose of hazardous waste according to applicable regulations. (EPA image)

### ***Recommendation for corrective action issued to the chief financial officer:***

- 1 Correct the accounts receivable and earned revenue balances.

### ***Recommendation for corrective action issued to the chief financial officer, in coordination with the assistant administrator for Land and Emergency Management:***


- 2 Assess the EPA's procedures for recording Hazardous Waste Electronic Manifest System Fund delinquent amounts and implement controls to prevent accounts receivable and earned revenue duplication.

## Hotline Contacts

### Report Initiated via the OIG Hotline

#### ***The EPA Needs to Improve the Transparency of Its Cancer-Assessment Process for Pesticides***

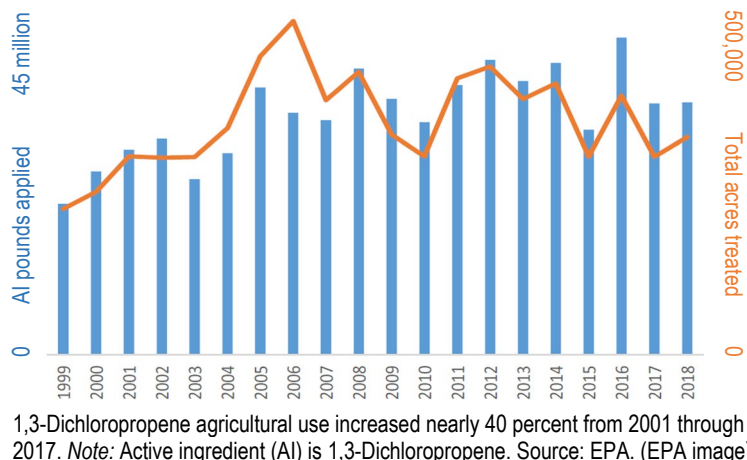
Report No. [22-E-0053](#), issued July 20, 2022

 Ensuring the safety of chemicals.

 Ensuring the safe use of chemicals; Safeguarding scientific integrity.

The EPA did not adhere to standard operating procedures and requirements for its cancer assessment of 1,3-Dichloropropene, an agricultural pesticide. Specifically, the EPA did not have guidance regarding the two scientific approaches it used for the cancer assessment, adhere to docketing and transparency requirements, follow its literature-search procedures, document its review of health effects data, or adhere to the EPA's *Peer Review Handbook* and the Office of

Management and Budget's guidance on peer review. These deficiencies undermined the scientific credibility of the 1,3-Dichloropropene cancer assessment, which led to questioning by multiple stakeholders. We initiated this evaluation in response to multiple complaints submitted to the OIG Hotline.



#### ***Recommendations for corrective action issued to the assistant administrator for Chemical Safety and Pollution Prevention:***

- 1 Issue guidance on when and how to conduct the kinetically derived maximum dose approach in cancer-risk assessments for pesticides.
- 2 Issue guidance on using and applying a weight-of-evidence approach in cancer-risk assessments for pesticides.
- 3 Update the docket for 1,3-Dichloropropene to include all required materials, including minutes and a list of participants, for meetings between the EPA and the registrant related to the 1,3-Dichloropropene pesticide-registration review and cancer assessment.
- 4 Issue guidance to clarify when to docket meetings related to a registration for other related activities that occur concurrent to the pesticide-registration-review process, such as the cancer-reassessment process.
- 5 Conduct a comprehensive literature search that identifies all published scientific studies concerning the potential carcinogenicity of 1,3-Dichloropropene, including a methodology to reconcile inconsistencies in the scientific data, and publish the results of the literature search and reconciliations.
- 6 Update the Cancer Assessment Review Committee standard operating procedures to comply with the Office of Pesticide Programs' literature search standard operating procedures and the broader quality principles in the Office of Management and Budget's 2002 *Information Quality Guidelines*, which includes a methodology to reconcile inconsistencies in the scientific data.
- 7 Issue procedures to document:
  - a. The independence of Cancer Assessment Review Committee members from the work products they review.
  - b. That appropriate expertise is represented on the Cancer Assessment Review Committee for each meeting.
  - c. When other ad hoc voting members, such as scientists from other EPA offices, should be added to the Cancer Assessment Review Committee.
  - d. Regular assessments of the Cancer Assessment Review Committee to monitor and correct deficiencies and to determine whether applicable internal peer review standards are being met.
- 8 Conduct an external peer review on the 1,3-Dichloropropene cancer-risk assessment.
- 9 Issue specific criteria requiring external peer review of Office of Pesticide Programs' risk assessments that use scientifically or technically novel approaches or that are likely to have precedent-setting influence on future risk assessments, in accordance with the Office of Management and Budget's *Final Information Quality Bulletin for Peer Review*.



### Significant Investigation Initiated via the OIG Hotline

In an April 5, 2022 civil settlement agreement, a county school district from St. George, Utah, agreed to pay \$35,500 in restitution to the U.S. Department of Justice for violating the False Claims Act and the Diesel Emissions Reductions Act. On October 31, 2016, the school district applied for a rebate through the EPA's National Diesel Engine Rebate Program 2016 School Bus Replacement and Retrofit Funding Opportunity. In December 2016, the EPA notified the school district that it had been selected to receive \$250,000 to replace ten Class 3-8 school buses. According to the terms and conditions of the rebate program, the school district was to maintain ownership of the buses for three years after replacing or retrofitting the engines, as well as to "scrap" the old engines to prevent further use or sale. On August 22, 2017, the school district certified that it complied with these terms. Based on a hotline complaint received in April 2019, the OIG investigated the school district's claims and determined that it had actually replaced a fully functioning engine with a nonworking engine.

## U.S. Chemical Safety and Hazard Investigation Board

### ***Special Review of the U.S. Chemical Safety and Hazard Investigation Board Capabilities to Effectively Administer Its Programs and Operations***

Report No. [22-N-0056](#), issued September 7, 2022

The CSB's operations are challenged by vacancies in mission-critical positions, unclear internal processes, and an inability to fully use congressionally allocated funding and resources. These issues have caused investigative backlogs and other challenges in the Agency's accomplishment of its mission. Additionally, a recent conflict between the CSB's then-chairperson and the rest of the CSB's board over the scope of the board's authority has now been resolved. We did not issue any recommendations in this report, but we identified seven key areas that the CSB's board should consider as it develops a new strategic plan.

#### **Historical snapshot of CSB resources**

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022 (as of 6/30/22)
Budget allocation	\$11 M	\$12 M	\$12 M	\$12 M	\$13.4 M
Net outlays	\$10.6 M	\$9.9 M	\$10.5 M	\$10 M	\$7.9 M
<b>Difference (percentage)</b>	<b>\$0.4 M (4%)</b>	<b>\$2.1 M (18%)</b>	<b>\$1.5 M (13%)</b>	<b>\$2.0 M (17%)</b>	<b>*</b>
Budgeted/allocated FTEs	48	47	40	38	44
Number of actual FTEs at end of period	32	31	34	29	33
<b>Difference (percentage)</b>	<b>16 (33%)</b>	<b>16 (34%)</b>	<b>6 (15%)</b>	<b>9 (24%)</b>	<b>11 (25%)</b>

Note: FTE = Full-Time Employee.

Source: The CSB. (EPA OIG table)

\* Not provided since fiscal year had not yet ended as of June 30, 2022.

### ***Management Alert: Data Vulnerabilities Could Impact the CSB's Ability to Carry Out Its Obligations Under the Federal Information Security Modernization Act of 2014 (Contractor-Produced Report)***

Report No. [22-N-0058](#), issued September 22, 2022

As it evaluated the CSB's compliance with the Federal Information Security Modernization Act of 2014 for FY 2022, our contractor SB & Company LLC identified issues that may significantly impact the confidentiality, integrity, and availability of the CSB's data. We issued this management alert while the evaluation was still ongoing to immediately alert the CSB to these issues, which include servers not being backed up, the network not being scanned for vulnerabilities, and risk assessments not being performed. We did not issue any recommendations in this report.

## 2.2 Investigative Work

### Significant Investigations

#### ***Individuals Ordered to Pay Restitution for Making False Reports to the EPA***

On September 30, 2022, a businesswoman from Lexington, Kentucky, was sentenced by the U.S. District Court, Eastern District of Kentucky, to 42 months in federal prison for conspiracy to commit wire fraud, wire fraud, and money laundering and ordered to pay restitution in the amount of \$1,048,255 to the U.S. Department of Energy and \$500,000 to the Kentucky Cabinet for Economic Development, Office of Entrepreneurship and Small Business Innovation. On May 5, 2022, the businesswoman's coconspirator, a businessman from Lexington, Kentucky, was ordered by the U.S. District Court, Eastern District of Kentucky, to pay \$100,000 in restitution to the EPA. According to the businessman's plea agreement, he submitted false reports to the EPA from December 2017 through May 2019 to justify payments totaling \$100,000 under an EPA research grant. This judgment brought the total restitution to \$1,648,255.

*This investigation was conducted jointly with the Department of Energy OIG and the Department of Defense OIG Defense Criminal Investigative Service.*

#### ***Florida-Based Company Settles over Wage Overpayments and Fund Misdirection***

On May 9, 2022, a Florida-based company entered into a settlement agreement with the U.S. District Court, Northern District of Florida, and agreed to pay \$42,076 to the Department of Justice because of a breach of contract. In 2019, the EPA awarded the company a \$99,994.98 contract through the Small Business Innovation Research Program for research on a system to detect hazardous and recyclable materials in construction and demolition debris. The investigation determined that the Florida-based company's chief executive officer approved wage overpayments and misdirected the government funds toward research that was unrelated to the contract.

#### ***Utility Services Company and Owner Plead Guilty to False Sample Submissions***

On May 25, 2022, a water utility services company and its owner pleaded guilty in the Superior Court of Thurston County in Olympia, Washington, to their roles in defrauding state regulators and customers by submitting false water samples to a laboratory for lead and copper testing. The EPA's federal regulations require water systems to collect and analyze tap samples from homes to determine whether lead is present in the water distribution system. The company was charged with one felony count of offering false instrument for filing or record, and the owner was charged with one count of attempted offering false instrument for filing or record. The company was assessed a \$5,000 fine, and the owner received a suspended sentence of 364 days of imprisonment and a \$5,000 fine, which was to be suspended upon successful completion of 80 hours community service and two years of probation. This case was prosecuted by the Environmental Protection Division of the Washington State Attorney General's Office.

#### ***Methamphetamine Cleanup Contractor Debarred Because of Fraudulent Certifications***

On September 23, 2021, a former Tennessee methamphetamine cleanup contractor was charged in the U.S. District Court for the Eastern District of Tennessee, Greenville Division, with one count of 18 U.S.C. § 641, theft of public money less than \$1,000. The cleanup contractor was working under the oversight of the Tennessee Department of Environment and Conservation, which uses an EPA Brownfields grant for methamphetamine decontamination program oversight and training. It was alleged that the cleanup contractor fraudulently issued certificates of fitness to declare properties that had been quarantined for methamphetamine contamination as safe for human use. As a result, the property owners believed the homes were certifiably "clean" of any methamphetamine use or damage. On September 30, 2021, the

contractor was sentenced to one year of probation and ordered to pay \$2,000 in restitution to the affected homeowner for this specific charge. On June 1, 2022, the EPA Office of Suspension and Debarment, debarred the contractor from participation in federal procurement and nonprocurement programs for a three-year period.

*This investigation was conducted jointly with the Tennessee Department of Environment and Conservation.*

### ***Burlington Individual Pleads Guilty to Fraud, False Claims, and Other Charges***

On June 9, 2022, an individual from Burlington County, New Jersey, pleaded guilty in the U.S. District Court for the District of New Jersey to one count of knowingly distributing or selling an unregistered pesticide in violation of the Federal Insecticide, Fungicide, and Rodenticide Act; one count of wire fraud; and one count of presenting false claims to the United States. The individual claimed the unregistered pesticide would kill the coronavirus. From March 2020 through May 2021, the individual used these fraudulent representations to make more than 150 sales of unregistered pesticides for a profit of more than \$2.74 million. The purchasers of these unregistered pesticides included a police department in Delaware; a fire department in Virginia; a medical clinic in Georgia; a janitorial supply company in New York; a school district in Wisconsin; and numerous U.S. government agencies, including the U.S. Marshal's Service, Moody Air Force Base, the U.S. Department of Veterans Affairs, and the National Forest Service. Pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act, the EPA is responsible for regulating the manufacture, labeling, and distribution of all pesticides shipped or received in interstate commerce. As part of the plea agreement, the individual agreed to forfeit \$2.74 million and make full restitution for all losses resulting from the individual's commission of the charged crimes.

*This investigation was conducted jointly with the EPA Criminal Investigation Division; Homeland Security Investigations; the Department of Defense OIG Defense Criminal Investigative Service; and the Naval Criminal Investigative Service.*

### ***Individuals Debarred for Issuing Surety Bonds Backed by Worthless Certificates***

On July 14 and 15, 2022, four individuals and 11 affiliated businesses were debarred by the EPA from federal procurement and nonprocurement programs. One individual and five companies were debarred for a ten-year period, and three individuals and six companies were debarred for a five-year period. The individuals were previously convicted in the U.S. District Court for the Southern District of Florida of conspiracy to commit mail and wire fraud. From approximately March through December 2015, the individuals unlawfully enriched themselves by obtaining payments from construction companies—which were the beneficiaries of federal government contracts, including from the EPA—in exchange for issuing purportedly valuable surety bonds that were, in fact, secured by worthless gold certificates. During the course of the fraud, one of the individuals, acting as a so-called “individual surety,” pledged over \$30 million in assets to builders working on large-scale infrastructure and residential construction projects.

*This investigation was conducted jointly with the U.S. Department of Veterans Affairs OIG; the U.S. Department of Transportation OIG; the U.S. Department of the Treasury Internal Revenue Service Criminal Investigation Division; and The Port Authority of New York and New Jersey OIG.*

### ***Remediation Project Manager Pleads Guilty for Misleading Federal Authorities***

On July 28, 2022, a former project manager for an environmental remediation company pleaded guilty in the U.S. District Court for the Western District of Missouri to misleading federal authorities about lead contamination in a city park in Granby, Missouri. The company was awarded a contract from the U.S. Army Corps of Engineers and the EPA, which totaled nearly \$12 million, to perform mine waste

remediation at the Newton County Mine Waste Remediation Superfund Site in and around Granby. This area had been contaminated by lead in the surface soil that was deposited through historical mining and smelting operations. However, the investigation determined that the project manager deliberately made false statements and provided false information to regulators regarding the level of lead contamination that continued to exist at the park. Because of the project manager's actions, the EPA had to hire another contractor to remediate the city park, resulting in additional costs to the EPA. Under federal statutes, the project manager is subject to a sentence of up to five years in federal prison without parole and a fine up to \$250,000.

*This investigation was conducted jointly with the EPA Criminal Investigation Division; the U.S. Department of Defense OIG Defense Criminal Investigative Service; and the Army Criminal Investigative Division, Major Procurement Fraud Unit.*

### **Corporation Agrees to Pay \$500,000 to Resolve False Certification Allegations**

On September 1, 2022, the New York State Environmental Facilities Corporation, a public benefit corporation, entered into an agreement with the U.S. Department of Justice, Northern District of New York, to pay \$500,000 to resolve allegations that it falsely certified that several individuals were working at the corporation in support of an EPA water-quality improvement grant for the state's Clean Water State Revolving Fund program. The investigation determined, and the Environmental Facilities Corporation acknowledged, that these individuals were instead working directly for former governors of New York in positions unrelated to the EPA grant and the Clean Water State Revolving Fund program. As part of the settlement agreement, the Environmental Facilities Corporation admitted that now-former senior corporation officials caused the state to include part of these individuals' salaries and benefits in federal funding requests without disclosing that the individuals were hired by and worked for the Office of the Governor.

*This investigation was conducted jointly with the Federal Bureau of Investigation.*

### **Reports of Investigation—Employee Integrity**

A Report of Investigation documents the facts and findings of an OIG investigation and generally involves an employee integrity matter. When the OIG's Office of Investigations issues a Report of Investigation that has at least one supported allegation, it requests that the entity receiving the report—whether it is an office within the EPA, the CSB, or the OIG—provide a notification to the OIG within 60 days regarding the administrative action taken or proposed to be taken in the matter. This section provides information on how many Reports of Investigation with at least one supported allegation were issued to the EPA, the CSB, or the OIG, as well as how many of those Reports of Investigation did not receive a response within the 60-day period. For the reporting period ending September 30, 2022, the Office of Investigations issued one Report of Investigation and received zero responses outside the 60-day window.

#### **Agency and OIG Reports of Investigation**

Reports of Investigation with findings issued 4/1/22–9/30/22		Responses received or pending after 60-day response period			
To the EPA	To the OIG	Received from the EPA*	Pending from the EPA, as of 9/30/22	Received from the OIG*	Pending from the OIG, as of 9/30/22
0	1	0	0	0	0

\* The EPA or the OIG will or will not take an action or will conduct a supplemental investigation.

## 2.3 Instances of Whistleblower Retaliation and Interference with Independence

### *Whistleblower Retaliation*

Section 5(a)(20) of the Inspector General Act requires a detailed description of any instances of whistleblower retaliation noted by the OIG. This requirement includes reporting information about any officials found to have engaged in retaliation and the consequences the EPA or the CSB imposed to hold such officials accountable. There were no whistleblower retaliation cases closed within the semiannual period ending September 30, 2022. No officials were found to have engaged in retaliation.

### *Interference with Independence*

Section 5(a)(21) of the Inspector General Act requires a detailed description of any attempt by the EPA or the CSB to interfere with the independence of the OIG. This includes “budget constraints designed to limit the capabilities of the [OIG]” and incidents in which the EPA or the CSB “has resisted or objected to oversight activities of the [OIG] or restricted or significantly delayed access to information.” Similarly, section 5(a)(5) requires that the OIG report any instances where the OIG informed the EPA administrator or CSB chairperson that information or assistance was unreasonably refused or not provided to the OIG.

Generally, we will report on incidents responsive to sections 5(a)(21) and 5(a)(5) in the semiannual report covering the period during which the relevant review was completed or the relevant investigation was closed. There were no reviews completed or investigations closed involving attempts by the EPA or the CSB to interfere with the OIG’s independence within the semiannual period ending September 30, 2022.

### *Incident Related to Independence*

On April 8, 2022, the OIG Office of Investigations was notified by an OIG Office of Counsel attorney that an EPA Criminal Investigation Division special agent had obtained and maintained unauthorized access to the OIG’s whistleblower protection coordinator shared email account for an unknown period. Based on available records, we believe that an EPA information technology contractor inadvertently provided the special agent with unauthorized access to the account from September 2021 until approximately December 2021, when we discovered the breach. During this three-month period, the special agent had complete access to the account and its contents, including the privileged names of whistleblowers and potential whistleblowers.

The OIG also has other confidential and sensitive shared email accounts, including the OIG Hotline, Freedom of Information Act, information systems officer, and counsel email accounts. Subsequent to the incident described above, to resolve concerns regarding the security and independence of the OIG’s email accounts, we requested that the Agency relinquish access to our confidential and sensitive accounts to our email administrators. This request was facilitated. Now, only two information technology specialists from the OIG serve as the sole administrators and owners of those shared email accounts, and they review the account audit reports on a weekly basis to ensure the integrity of access lists and authorized users. Furthermore, the authorized users for the whistleblower protection coordinator email account were pared down to two OIG attorneys: one primary and one alternate.

All of the OIG’s individual email accounts, including those of the inspector general and the OIG’s most senior personnel, remain under the Agency’s information technology control. This incident underscores the need for an OIG information technology infrastructure that is separate from the Agency to protect both inspector general independence and whistleblower confidentiality.

## 2.4 Single Audit Work

In accordance with the Single Audit Act of 1984, as amended, and Office of Management and Budget guidance, nonfederal entities that expend \$750,000 or more in federal funds are required to have a comprehensive annual audit of their financial statements and to comply with major federal program requirements. The entities receiving the funds include states, local governments, tribes, and nonprofit organizations. The Act provides that grantees are to be subject to one annual comprehensive audit of all their federal programs versus a separate audit of each federal program—hence the term “single audit.” The single audits are performed by independent, nonfederal auditors. Federal agencies rely upon the results of single audit reporting when performing their grants-management oversight of these entities.

The OIG provides an important service to the EPA by performing desk reviews of audit reporting packages. A desk review is an examination of the reporting package, which includes financial statements, federal award expenditures, and the independent auditor’s report. During this semiannual reporting period, we conducted desk reviews of six reporting packages for which the EPA was the cognizant agency. We identified deficiencies in one reporting package; these deficiencies pertained to the expenditures recorded on the data collection form submitted to the Federal Audit Clearinghouse and to language in the independent auditor’s report.



## SECTION 3: STATISTICAL DATA



## 3.1 Audit Report Resolution

**For the semiannual period ending September 30, 2022:**

### OIG-issued reports with questioned costs

Report category	Number of reports	Questioned costs* (in thousands)	Unsupported costs (in thousands)
A. For which no management decision was made by April 1, 2022	10	\$0	\$0
B. New reports issued during period	12	\$10,347	\$10,347
<b>Subtotals (A + B)</b>	22	\$10,347	\$10,347
C. For which a management decision was made during the reporting period:	14		
(i) Dollar value of disallowed costs		\$1,722	\$1,722
(ii) Dollar value of costs not disallowed		\$0	\$0
D. For which no management decision was made by September 30, 2022	8	\$8,625	\$8,625

Notes: Due to rounding, the costs may not appear in exact sum. The table represents audit and evaluation reports only.

\* Questioned costs include unsupported costs.

### OIG-issued reports with recommendations that funds be put to better use

Report category	Number of reports	Funds to put to better use (in thousands)
A. For which no management decision was made by April 1, 2022	10	\$46,578
B. New reports issued during the reporting period	12	\$3,500
<b>Subtotals (A + B)</b>	22	\$50,078
C. For which a management decision was made during the reporting period:	14	
(i) Dollar value of recommendations from reports that were agreed to by management		\$46,578
(ii) Dollar value of recommendations from reports that were not agreed to by management		\$0
D. For which no management decision was made by September 30, 2022	8	\$3,500

Notes: Due to rounding, the costs may not appear in exact sum. The table represents audit and evaluation reports only.

## 3.2 Summary of Investigative Results

**For the semiannual period ending September 30, 2022:**

### Summary of investigative activity

Cases open as of April 1, 2022*	134
Cases opened during period	49
Cases closed during period**	50
Cases open as of September 30, 2022	134

Complaints open as of April 1, 2022*	30
Complaints opened during period	93
Complaints closed during period	70
Complaints open as of September 30, 2022	53

\* Adjusted from prior period; investigations had been erroneously identified as open because of a glitch in the case management system that unpopulated the “date closed” entries.

\*\* Includes case that was reopened for further investigative work that was not pending during previous reporting period.

### Results of criminal and civil actions

	EPA OIG only	Joint*	Total
Criminal indictments/informations/complaints**	2	5	7
Convictions***	1	1	2
Civil judgments/settlements/filings	3	1	4
Criminal fines and recoveries	\$5,000	\$1,648,555	\$1,653,555
Civil recoveries	\$77,576	\$500,000	\$577,576
Prison time****	0 months	190 months	190 months
Prison time suspended	12 months	0 months	12 months
Home detention	0 months	0 months	0 months
Probation	24 months	36 months	60 months
Community service	80 hours	0 hours	80 hours

\* With one or more other federal agencies.

\*\* Sealed indictments are not included in this category. This number includes data from the spring 2022 reporting period that were not included in Report No. EPA-350-R-22-001, *Semiannual Report to Congress: October 1, 2021 to May 30, 2022*.

\*\*\* The term “convictions” comprises finalized convictions (those for which sentencing is completed) filed during the reporting period.

\*\*\*\* This number includes data from the spring 2022 reporting period that were not included in Report No. EPA-350-R-22-001, *Semiannual Report to Congress: October 1, 2021 to May 30, 2022*.

### Administrative actions

	EPA OIG only	Joint*	Total
Suspensions	0	0	0
Debarments	3	20	23
Other administrative actions	5	3	8
<b>Total</b>	<b>8</b>	<b>24</b>	<b>32</b>
<b>Administrative recoveries</b>	<b>\$0</b>	<b>\$367,702</b>	<b>\$367,702</b>
<b>Cost savings</b>	<b>\$163,051</b>	<b>\$14,691</b>	<b>\$177,742</b>

\* With one or more other federal agencies.

**Summary of investigative reports issued and referrals for prosecution\***

Number of investigative reports/referrals issued**	1
Number of persons referred to U.S. Department of Justice for criminal prosecution***	22
Number of persons referred to state and local authorities for criminal prosecution***	1
Number of criminal indictments and informations resulting from any prior referrals to prosecutive authorities	0

\* Investigative reports comprise final, interim, and supplemental Reports of Investigation, as well as Final Summary Reports. In calculating the number of referrals, corporate entities were counted as “persons.”

\*\* This number may differ from the numbers reported in the Reports of Investigation section.

\*\*\* This number includes referrals from the spring 2022 reporting period that were not included in Report No. EPA-350-R-22-001, *Semiannual Report to Congress: October 1, 2021 to May 30, 2022*.

**Subjects of employee integrity investigations**

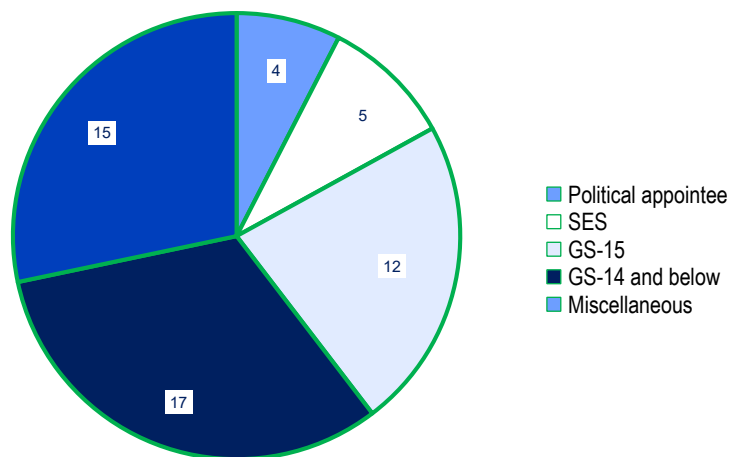
	Political appointee	SES	GS-15	GS-14 and below	Misc.*	Total
Pending as of April 1, 2022	6	5	10	8	14	43
Opened	0	2	2	14	4	22
Closed	5	1	1	6	2	15
Pending as of September 30, 2022**	4	5	12	17	15	53

Notes: SES stands for Senior Executive Service. GS stands for General Schedule. Employee integrity investigations involve allegations of criminal activity or serious misconduct by Agency employees that could threaten the credibility of the Agency, the validity of executive decisions, the security of personnel or business information entrusted to the Agency, or financial loss to the Agency (such as abuse of government bank cards or theft of Agency funds).

\* Refers to investigations for cases related to individuals who fall outside the categories outlined in this table, such as former employees and federal contractors.

\*\* Pending numbers as of September 30, 2022, may not add up due to investigative developments resulting in subjects being added or changed.

The chart below provides the number of individuals, by grade, who are the subject of employee integrity investigations.

**Subjects of employee integrity investigations:  
number of individuals by grade**

Notes: SES stands for Senior Executive Service. GS stands for General Schedule. Miscellaneous employees include federal contractors, nongovernment employees, and former government employees.

# APPENDIXES



## Appendix 1—Reports Issued

Section 5(a)(6) of the Inspector General Act requires a listing, subdivided according to subject matter, of each report issued by the OIG during the reporting period. For each report, where applicable, the Act also requires a listing of the dollar value of questioned costs, including unsupported costs, and the dollar value of recommendations that funds be put to better use.

Report number	Report title	Questioned costs				Potential monetary benefits
		Date	Ineligible	Unsupported	Unreasonable	
EVALUATIONS IN ACCORDANCE WITH QUALITY STANDARDS FOR INSPECTION AND EVALUATION						
22-E-0047	The EPA Continues to Fail to Meet Inspection Requirements for Hazardous Waste Treatment, Storage, and Disposal Facilities	6/23/22	\$0.00	\$0.00	\$0.00	\$0.00
22-E-0049	The Coronavirus Pandemic Caused Schedule Delays, Human Health Impacts, and Limited Oversight at Superfund National Priorities List Sites	6/30/22	0.00	0.00	0.00	0.00
22-E-0051	Additional Internal Controls Would Improve the EPA's System for Electronic Disclosure of Environmental Violations	7/7/22	0.00	0.00	0.00	0.00
22-E-0052	The EPA Was Not Transparent About Changes Made to a Long-Chain PFAS Rule After Administrator Signature	7/20/22	0.00	0.00	0.00	0.00
22-E-0053	The EPA Needs to Improve the Transparency of Its Cancer-Assessment Process for Pesticides	8/8/22	0.00	0.00	0.00	0.00
22-E-0054	Lessons Identified from Prior Oversight of the EPA's Geographic and National Estuary Programs	6/23/22	0.00	0.00	0.00	0.00
SUBTOTAL = 6			\$0.00	\$0.00	\$0.00	\$0.00
FINANCIAL AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
22-F-0059	The EPA's Fiscal Years 2021 and 2020 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	9/26/22	\$0.00	\$0.00	\$0.00	\$0.00
22-F-0060	The EPA's Fiscal Years 2021 and 2020 (Restated) Financial Statements for the Pesticide Registration Fund	9/26/22	0.00	0.00	0.00	0.00
22-F-0062	The EPA's Fiscal Years 2021 and 2020 (Restated) Hazardous Waste Electronic Manifest System Fund Financial Statements	9/30/22	0.00	0.00	0.00	3,500,000.00
SUBTOTAL = 3			\$0.00	\$0.00	\$0.00	\$3,500,000.00
PERFORMANCE AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
22-P-0046	The EPA Needs to Fully Address the OIG's 2018 Flint Water Crisis Report Recommendations by Improving Controls, Training, and Risk Assessments	5/17/22	\$0.00	\$0.00	\$0.00	\$0.00
22-P-0048	The EPA's Approval and Oversight of Water Infrastructure Finance and Innovation Act Loans Complied with Federal Law and Regulations	6/22/22	0.00	0.00	0.00	0.00
22-P-0050	The EPA Was Not Compliant with the Payment Integrity Information Act for Fiscal Year 2021	6/27/22	0.00	10,347,088.00	0.00	0.00
SUBTOTAL = 3			\$0.00	\$10,347,088.00	\$0.00	\$0.00
PROJECTS NOT IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS OR QUALITY STANDARDS FOR INSPECTION AND EVALUATION						
22-N-0055	Considerations for the EPA's Implementation of Grants Awarded Pursuant to the Infrastructure Investment and Jobs Act	8/11/22	\$0.00	\$0.00	\$0.00	\$0.00
22-N-0056	Special Review of the U.S. Chemical Safety and Hazard Investigation Board Capabilities to Effectively Administer Its Programs and Operations	9/7/22	0.00	0.00	0.00	0.00
22-N-0057	Considerations From Single Audit Reports for the EPA's Administration of Infrastructure Investment and Jobs Act Funds	9/14/22	0.00	0.00	0.00	0.00

Report number	Report title	Date	Questioned costs			Potential monetary benefits
			Ineligible	Unsupported	Unreasonable	
22-N-0058	Management Alert: Data Vulnerabilities Could Impact the CSB's Ability to Carry Out Its Obligations Under the Federal Information Security Modernization Act of 2014 (Contractor-Produced Report)	9/22/22	0.00	0.00	0.00	0.00
22-N-0061	The EPA Failed to Complete Corrective Actions as Certified to Address OIG Recommendations	9/30/22	0.00	0.00	0.00	0.00
<b>SUBTOTAL = 5</b>			<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>TOTAL REPORTS ISSUED = 17</b>			<b>\$0.00</b>	<b>\$10,347,088.00</b>	<b>\$0.00</b>	<b>\$3,500,000.00</b>



## Appendix 2—Delayed EPA Management Decisions and Comments; Management Decisions with Which the OIG Disagrees

### For Reporting Period Ending September 30, 2022

Section 5(a)(10)(A) of the Inspector General Act of 1978 requires a summary of each audit, inspection, and evaluation report issued before the commencement of the reporting period for which no management decision had been made by the end of the reporting period, an explanation of the reasons such management decision had not been made, and a statement concerning the desired timetable for achieving a management decision on each such report. For the purposes of the semiannual report, the Act defines “management decision” to mean “the evaluation by the management of an establishment of the findings and recommendations included in an audit report and the issuance of a final decision by management concerning its response to such findings and recommendations, including actions concluded to be necessary.” The Federal Acquisition Streamlining Act of 1994, as amended, requires the head of each agency to make management decisions on all findings and recommendations set forth in an OIG audit report within six months of the final report being issued. In the “Reports Without Management Decision Within Six Months” section in this appendix, we detail the three audit and evaluation reports containing eight recommendations for which no management decision was made within six months of final report issuance and that were still pending a management decision as of September 30, 2022.

Section 5(a)(10)(B) of the Inspector General Act requires a summary of each audit, inspection, and evaluation report issued before the commencement of the reporting period for which no establishment comment was returned within 60 days of providing the report to the establishment. The OIG interprets this provision to apply to reports for which the end date of the 60-day Agency comment period occurs during the semiannual period. There were three reports for which we did not receive a response within a 60-day period that ended during this semiannual period. For one report, we received a response on the first business day after the 60-day period. We did not include that report in this appendix. We summarize the other two reports in the “Reports for Which No Comment Was Received Within 60 Days” section in this appendix.

Section 5(a)(12) of the Inspector General Act requires that the semiannual report contain information concerning any significant management decision with which the inspector general disagrees. In this semiannual reporting period, there was one EPA management decision regarding one recommendation with which the inspector general continued to disagree. We originally reported this disagreement in Report No. [EPA-350-R-21-002](#), *Semiannual Report to Congress: April 1, 2021–September 30, 2021*, issued on November 24, 2021. We summarize the status of this disagreement in the “Significant Management Decisions with Which OIG Disagrees” section in this appendix.

### Reports Without Management Decision Within Six Months

#### Office of Enforcement and Compliance Assurance

##### Report No. [21-P-0132](#), *Resource Constraints, Leadership Decisions, and Workforce Culture Led to a Decline in Federal Enforcement, May 13, 2021*

**Summary:** EPA-led compliance monitoring activities, enforcement actions, monetary enforcement results, and environmental benefits generally declined nationwide from FY 2007 through FY 2018. While annual enforcement measures, such as penalty dollars assessed or commitments to clean up pollution, declined, the results varied year-to-year based on the conclusion of large cases. The decline in enforcement resources was a primary driver of the observed declining enforcement trends, resulting in fewer compliance monitoring activities and concluded enforcement actions. EPA leaders also made strategic decisions that affected enforcement trends, such as focusing limited resources on the most serious cases and, in 2017, emphasizing deference to state enforcement programs and compliance assistance. From 2006 through 2018, growth in the domestic economy and new laws increased the size and level of activity in key sectors that the EPA regulated, but the EPA’s capacity to meet that need decreased. The EPA’s annual enforcement reports do not provide context for understanding the EPA’s enforcement accomplishments and the impact these enforcement activities have on human health and the environment. For example, the EPA does not measure or report data for compliance-assistance activities, informal enforcement actions, and noncompliance rates. The EPA could also provide additional information that would provide context about the scope of activities captured by its enforcement measures, such as the type of inspections conducted, and the types and toxicity of pollutants removed from the environment.

We recommended that the EPA’s assistant administrator for Enforcement and Compliance Assurance complete a workforce analysis to assess the Agency’s capacity to maintain a strong enforcement field presence that protects human health and the environment and to integrate the results of this analysis into the Office of Enforcement and Compliance Assurance’s strategic

and annual planning processes. These two recommendations were unresolved at report issuance. We made six recommendations about how the EPA can improve the way it reports enforcement achievements. The recommendation to measure the Agency's compliance assistance and informal enforcement activities was also unresolved at report issuance.

**Resolution Status:** The Agency provided a response to the final report on July 12, 2021, which outlined the Agency's planned corrective actions and estimated milestone dates for the three unresolved recommendations issued in our report. Based on the information and supporting documentation provided in the response, we did not agree with the Agency's planned corrective actions for the three unresolved recommendations. On August 18, 2021, we issued a memorandum that advised the Agency to follow the dispute resolution process. As part of the dispute resolution process, the chief financial officer mediated a resolution discussion. However, the three recommendations remain unresolved.

### Office of Land and Emergency Management

#### **Report No. [20-P-0062](#), *EPA Needs to Improve Its Emergency Planning to Better Address Air Quality Concerns During Future Disasters*, December 16, 2019**

**Summary:** Most air toxic emission incidents during Hurricane Harvey occurred within a five-day period of the storm's landfall. The majority of these emissions were due to industrial facilities shutting down and restarting operations in response to the storm and storage tank failures. However, state, local, and EPA mobile air monitoring activities were not initiated in time to assess the impact of these emissions. The air monitoring data collected did not indicate that the levels of individual air toxics after Hurricane Harvey exceeded the health-based thresholds established by the State of Texas and the EPA. However, these thresholds do not consider the cumulative impact of exposure to multiple air pollutants at one time. Consequently, the thresholds may not be sufficiently protective of residents in communities that neighbor industrial facilities and experience repeated or ongoing exposures to air toxics. We did not identify instances of inaccurate communication from the EPA to the public regarding air quality after Hurricane Harvey. However, public communication of air monitoring results was limited.

We recommended that the assistant administrator for Land and Emergency Management develop guidance for emergency air monitoring in heavily industrialized areas, develop a plan to provide public access to air monitoring data, and assess the availability and use of remote and portable monitoring methods. We also recommended that the Region 6 regional administrator develop a plan to inform communities near industrial areas of adverse health risks, limit exposure to air toxics in these communities, and conduct environmental justice training. Additionally, we recommended that the associate administrator for Public Affairs establish a process to communicate the resolution of public concerns. The recommendations issued to the Region 6 regional administrator and the associate administrator for Public Affairs are resolved. The three recommendations issued to the assistant administrator for Land and Emergency Management remain unresolved.

**Resolution Status:** The EPA provided a formal response on February 28, 2020. On August 17, 2021, the Office of Land and Emergency Management provided revised corrective actions. Resolution efforts for the three unresolved recommendations continue. A meeting to discuss the proposed corrective actions with the Agency was scheduled for October 2022.

### Office of Water

#### **Report No. [20-E-0246](#), *EPA's 2018 BEACH Act Report to Congress Does Not Fully Meet Statutory Requirements*, August 13, 2020**

**Summary:** In a January 2018 OIG report, we found that the EPA had not reported to Congress on progress related to the Beaches Environmental Assessment and Coastal Health Act of 2000, referred to as the BEACH Act, as statutorily required. We recommended that the EPA submit the mandated reports to Congress. In response to our recommendations, the EPA issued a BEACH Act report to Congress in July 2018. However, during the course of our follow-up evaluation, we found that the EPA's July 2018 report to Congress did not fully meet the reporting requirements of the BEACH Act and the Plain Writing Act of 2010. The report also did not adhere to federal internal control principles. Specifically:

- The report did not evaluate federal and local efforts to implement the BEACH Act.
- Although the report listed recommendations for additional water quality criteria and improved monitoring methodologies, the recommendations could be improved by using plain language principles, which would help readers more easily understand the recommendations.
- The report recommendations did not specify who needs to act or the barriers to implementation.

In addition, we concluded that the EPA Office of Water staff did not contact congressional staff members to inquire about what information Congress needs from the Agency to make informed decisions regarding the BEACH Act program. By issuing a

report that did not fully meet the requirements of the BEACH and Plain Writing Acts, the EPA missed the opportunity to provide Congress with the information needed for effective decision-making.

We recommended that the assistant administrator for Water develop and adopt a written strategy to verify that future BEACH Act reports to Congress fully meet the reporting requirements of the BEACH Act, expectations that federal agencies comply with the Plain Writing Act, and federal internal control principles. We also recommended that the EPA submit a report in 2022 that evaluates efforts to implement the BEACH Act. The Agency disagreed with our recommendations and did not provide acceptable corrective actions and planned completion dates.

*Resolution Status:* On October 8, 2020, the Office of Water provided a response that communicated its disagreement with the findings and recommendations. The Agency provided a second response on July 23, 2021. The second response communicated that the Office of Water planned to work with staff in the Office of Congressional and Intergovernmental Relations to get congressional input on the EPA's BEACH Act program. On August 12, 2021, we issued a memorandum to the Agency that explained that the Agency did not provide corrective actions that met the intent of the report's recommendations and advised the Agency to follow the dispute resolution process. Although the two recommendations remain unresolved, the Agency informed us that it drafted its 2022 required report to Congress in a manner that meets the intent of the recommendations.

**Total reports issued before reporting period for which no management decision had been made as of September 30, 2022 = 3**

### *Reports for Which No Comment Was Received Within 60 Days*

#### **Office of the Chief Financial Officer**

**Report No. [22-P-0050](#), *The EPA Was Not Compliant with the Payment Integrity Information Act for Fiscal Year 2021*, June 27, 2022**

*Summary:* The EPA was not compliant with the Payment Integrity Information Act of 2019 because the Agency did not adhere to all of the Office of Management and Budget improper payment reporting requirements for FY 2021. Specifically, the EPA did not adequately conclude whether its programs with annual outlays greater than \$10 million were likely to make improper payments above or below the statutory threshold.

The EPA divides its expenditures into ten payment streams, eight of which have annual outlays greater than \$10 million. In FY 2021, with respect to the grants payment stream, while the Agency reviewed payments to determine the error rate and estimate the value of improper payments, it did not incorporate the cost-allowance principles set forth in 2 C.F.R. part 200, subpart E. This oversight occurred because the Office of the Chief Financial Officer's *Standard Operating Procedure Grants Improper Payment Review*, which was updated in September 2021, was not completed in time to use for the fiscal year 2021 risk assessment. The standard operating procedure is intended to be used to review the allowability of grant payments. For the remaining seven payment streams with outlays greater than \$10 million, the EPA did not establish an adequate methodology for determining risk-assessment attributes and results.

The Agency may not have reported approximately \$10.3 million in improper payments—of which approximately \$8.6 million may be subject to recovery—because it did not apply the cost-allowance principles in the review of grants payments. Further, because the EPA has not established an adequate methodology for risk assessments, the Agency's risk-assessment process does not provide reasonable assurance that payment streams are not susceptible to significant improper payments.

*Status:* This report contained four recommendations, three of which were unresolved. Therefore, we requested that the EPA provide us its responses concerning specific actions that are in process or proposed alternative corrective actions within 60 days. The Agency requested an extension until September 9, 2022, which we granted. The Agency provided a response on September 9, 2022. The response is currently under review.

#### **Office of Enforcement and Compliance Assurance**

**Report No. [22-E-0047](#), *The EPA Continues to Fail to Meet Inspection Requirements for Hazardous Waste Treatment, Storage, and Disposal Facilities*, June 8, 2022**

*Summary:* Our assessment of treatment, storage and disposal facilities, or TSDF, inspection rates remains unchanged from our 2016 report: the EPA has not met the statutory requirements for completing thorough inspections at all operating TSDFs either annually or once every two years, but inspection rates are nonetheless generally high. From FY 2015 through FY 2021,

the EPA completed 91 percent of the required TSDF inspections. If we exclude FYs 2020 and 2021—as activities those years were adversely affected by coronavirus pandemic restrictions—the overall inspection rate was 95 percent. In response to our 2016 report, the EPA stated that resource limitations caused by competing priorities contributed to its failure to meet statutory inspection rates. However, during this follow-up evaluation, we concluded that the underlying cause was a lack of prioritizing statutorily required inspections. If TSDF inspection rates do not meet statutory requirements, the EPA does not ensure TSDF compliance with the Resource Conservation and Recovery Act and may not be protecting human health and the environment from hazardous waste contamination in the manner directed by Congress.

**Status:** This report contained one recommendation, which is unresolved. Therefore, we requested that the EPA provide us its responses concerning specific actions that are in process or proposed alternative corrective actions within 60 days. The Office of Enforcement and Compliance Assurance requested an extension until August 15, 2022, which we granted because of an existing dispute resolution on a similar issue. The corrective actions included in the office's August 15, 2022 memorandum met the intent of the recommendation, and we now consider the recommendation resolved. We issued a closeout memorandum for this report on September 22, 2022.

**Total reports issued during the reporting period for which the Agency did not provide a written response within 60 days, as of September 30, 2022 = 2**

#### *Significant Management Decisions with Which the OIG Disagrees*

Report title, number, date	Recommendation (action official)	Potential cost savings	The OIG's disagreement with management decision originally reported	Update
Management Alert: Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns, <a href="#">20-N-0128</a> , March 31, 2020	Improve and continue to implement ongoing risk communication efforts by promptly providing residents in all communities near the 25 ethylene oxide-emitting facilities identified as high-priority by the EPA with a forum for an interactive exchange of information with the EPA or the states regarding health concerns related to exposure to ethylene oxide. (associate deputy administrator)	\$0	<a href="#">Fall 2021</a>	The EPA sent a status update on September 15, 2022, stating that the Agency will be completing outreach in November 2022 at three areas near ethylene oxide-emitting facilities that had not received public outreach when we completed our final report in March 2020. We will reassess the status of this recommendation once the EPA has completed its corrective actions.

## Appendix 3—Reports with Corrective Action Not Completed

In compliance with the reporting requirements of sections 5(a)(3) and 5(a)(10)(C) of the Inspector General Act, we are to identify each significant recommendation described in previous semiannual reports on which corrective action has not been completed, as well as provide a summary of each audit, inspection, and evaluation report for which there are any outstanding unimplemented recommendations. We are also to identify the aggregate potential monetary benefits, including funds that could be put to better use and questioned costs, of the unimplemented recommendations.

This appendix contains separate tables of unimplemented recommendations for the EPA and the CSB, which were issued in 60 OIG audit reports from 2008 through March 31, 2022.

There are 134 unimplemented recommendations for the EPA with potential monetary benefits of approximately \$75.9 million, none of which was sustained and redeemed by the Agency. Use of “sustained” in this case indicates agreement, in whole or in part, by the Agency to an OIG-identified monetary benefit. There are four unimplemented recommendations for the CSB, with no potential monetary benefits.

Below is a list of the EPA offices and regions responsible for the recommendations in the following tables. While a recommendation may be listed as unimplemented, the Agency may be on track to complete agreed-upon corrective actions by the planned due date.

### Responsible EPA Offices:

DA	Deputy Administrator (within the Office of the Administrator)
ADA	Associate Deputy Administrator (within the Office of the Administrator)
OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCSP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Enforcement and Compliance Assurance
OGC	Office of General Counsel
OLEM	Office of Land and Emergency Management
OMS <sup>1</sup>	Office of Mission Support
ORD	Office of Research and Development
OW	Office of Water
Region 2	
Region 3	
Region 5	
Region 6	
Region 9	
Region 10	
Science Advisor	

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<sup>1</sup> Effective November 26, 2018, the former Office of Environmental Information and Office of Administration and Resources Management were merged into the Office of Mission Support. In this appendix, any recommendations originally issued to the former offices will be listed as under the purview of the OMS.

## EPA Reports with Unimplemented Recommendations

*This table provides the full text of recommendations issued to the EPA prior to this semiannual period that remain unimplemented, along with the planned completion dates provided by the EPA when the associated final reports were issued and any subsequent revisions made by the EPA to those planned completion dates.*

*This table reflects the status of recommendations as of September 30, 2022.*

Report title, number, and date	Office	Unimplemented recommendation	The EPA's initial planned completion date (at time of report issuance)	The EPA's revised planned completion dates*	Potential monetary benefits** (in thousands)
<b>Category 1—Administrative and Business Operations</b>					
Brownfields Program-Income Monitoring Deficiencies Persist Because the EPA Did Not Complete All Certified Corrective Actions <a href="#">22-P-0033</a> , March 31, 2022	OLEM	1. Develop a policy and implement procedures to reduce the balances of available program income and establish a time frame for recipients to use or return the funds to the EPA.	U	9/30/27	
		2. Implement a method for tracking program income and compliance with post-closeout reporting requirements.	U	12/31/23	
		4. Provide training to regional Brownfields Revolving Loan Fund staff and management on the post-closeout tracking and monitoring requirements.	3/31/23		
		5. Expand existing guidance to include a deadline for post-closeout annual report submission.	U	9/30/27	
		6. Assess whether any of the \$46.6 million of program income under closeout agreements should be returned to the government.	U	9/30/24	\$46,578
The EPA Lacks Documented Procedures for Detecting and Removing Unapproved Software on the Agency's Network <a href="#">22-E-0028</a> , March 30, 2022	OMS	1. Develop and document procedures for detecting and removing unapproved software on the Agency's network, to include time frames for removal, risk classifications, and identification of software collecting privacy data.	10/31/22		
		2. Develop and provide training on the Agency's processes for detecting and removing unapproved software to users with privileges to install software on the EPA's network.	1/31/23		
EPA Needs to Complete Implementation of Religious Compensatory Time Training for Supervisors and Employees <a href="#">22-P-0019</a> , March 7, 2022	OMS	1. Require the EPA's Office of Human Resources to train all employees and supervisors who earn, use, or approve Religious Compensatory Time on the U.S. Office of Personnel Management's current regulatory requirements for, and the EPA's current policy and procedures related to, Religious Compensatory Time.	6/30/23		\$54
EPA Should Consistently Track Coronavirus Pandemic-Related Grant Flexibilities and Implement Plan for Electronic Grant File Storage <a href="#">22-P-0018</a> , February 22, 2022	OMS	1. Develop a standard operating procedure that instructs program offices and regions on tracking and documenting grant flexibilities and exceptions, and their impacts, due to unanticipated events in order to assure consistency in the information needed to manage grants.	12/31/23		
		2. Develop a plan to implement, by December 2022, a uniform electronic record-keeping system for grants to meet the Office of Management and Budget direction in M-19-21, <i>Transition to Electronic Records</i> , that all federal records must be created, retained, and managed in electronic formats with appropriate metadata.	12/31/22		
		3. Direct program offices and regions to use a uniform official electronic file system that would allow consistency in agencywide access and storage of electronic grant files.	12/31/22		
EPA Generally Adheres to Information Technology Audit Follow-Up Processes, but Management Oversight Should Be Improved <a href="#">22-P-0010</a> , December 8, 2021	OCSP	4. Implement controls to comply with federally and Agency-required time frames to install patches to correct identified vulnerabilities in the Pesticide Registration Information System application.	10/31/23		

**Legend:** \* Blank cells indicate that there have been no revisions to the initial planned completion dates.

\*\* Blank cells indicate that no potential monetary benefits were identified.

\*\*\* The EPA closed out the recommendation, but the OIG determined that the corrective action was not completed.

\*\*\*\* The EPA has not provided an updated planned completion date.

U—Unresolved when the report was issued but resolved at a later date.



Report title, number, and date	Office	Unimplemented recommendation	The EPA's initial planned completion date (at time of report issuance)	The EPA's revised planned completion dates*	Potential monetary benefits** (in thousands)
EPA's Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements <a href="#">22-F-0007</a> , November 15, 2021	OECA	4. Enforce the existing policies and procedures, which includes forwarding accounts receivable source documents to the Cincinnati Finance Center, in accordance with the time frame provided in the applicable resource management directives.	U	11/30/22	
		5. Implement a system that tracks the dates when accounts receivable source documents need to be submitted and are submitted by the Office of Enforcement and Compliance Assurance to the Cincinnati Finance Center.	U	11/30/22	
EPA's Fiscal Year 2020 Fourth-Quarter Compliance with the Digital Accountability and Transparency Act of 2014 <a href="#">22-P-0001</a> , November 8, 2021	OMS	1. Update policies and procedures to require that <i>Awardee/Recipient Legal Entity Name</i> and <i>Legal Entity Address</i> data elements match SAM.gov at the time of the award and any award modifications for all contracts and grants. At the time of any award modification, update the Agency's contracts or grants management system and the Federal Procurement Data System with any changes to these data elements.	10/31/22	12/31/22	
		3. Update the EPA's grants management system to align with the data standards of the Digital Accountability and Transparency Act of 2014, including all parts of data elements reported therein, and to allow input only of the acceptable values outlined for each data element in <i>DATA Act Information Model Schema, Reporting Submission Specification</i> .	9/30/23		
		4. Update the <i>Catalog of Federal Domestic Assistance Titles</i> on an annual basis, as required in <i>DATA Act Information Model Schema, Practices and Procedures</i> , Appendix F, "Update Cadence for Data Sources."	9/30/22	10/7/22	
EPA Needs to Strengthen Oversight of Its Travel Program Authorization and Voucher Approval Processes <a href="#">21-P-0265</a> , September 30, 2021	OCFO	4. Issue addendums to the Resource Management Directive System 2550B travel policy or equivalent to: a. Require approvers to estimate and compare the total cost of temporary change of station versus extended temporary duty travel and authorize the one that is most advantageous for the Agency, cost and other factors considered. b. Require the travel card cancellation and closeout process to occur within a predetermined number of days.	U	9/30/22 11/30/22	
EPA Needs to Strengthen Its Purchase Card Program Approval Process <a href="#">21-P-0242</a> , September 22, 2021	OMS	2. Provide CitiManager training and support to cardholders, approving officials, and the purchase card team that will establish the expectation that they use and enable them to effectively use CitiManager for the documentation, justification, and approval of purchases.	6/30/22	10/21/22	
		3. Require cardholders and approving officials who have completed the training in Recommendation 2 to maintain approvals and purchase documentation in CitiManager. Update all relevant policies and procedures to reflect this requirement.	6/30/22	10/21/22	
EPA's Emergency Response Systems at Risk of Having Inadequate Security Controls <a href="#">21-E-0226</a> , September 13, 2021	OLEM	1. Implement controls to follow National Institute of Standards and Technology guidance when conducting systems categorizations by: a. Involving the appropriate key stakeholders, including mission owners and the chief information security officer, during the system security categorization process as prescribed in the National Institute for Standards and Technology Special Publication 800-60 Volume I, Table 3, Process Roadmap. b. Having responsible parties adhere to all activity steps as outlined in the National Institute for Standards and Technology Process Roadmap, including selecting all application information types applicable to information systems. c. Having responsible parties document the security categorization determinations and decisions within system security plans as provided in the National Institute for Standards and Technology Process Roadmap, including documenting all downward adjustments to provisional security levels.	6/30/22	11/30/22	

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Report title, number, and date	Office	Unimplemented recommendation	The EPA's initial planned completion date (at time of report issuance)	The EPA's revised planned completion dates*	Potential monetary benefits** (in thousands)
EPA Needs to Improve Processes for Updating Guidance, Monitoring Corrective Actions, and Managing Remote Access for External Users <a href="#">21-E-0124</a> , April 16, 2021	OMS	1. Update information security procedures to make them consistent with current federal directives, including the National Institute of Standards and Technology Special Publication 800-53, Revision 5, <i>Security and Privacy Controls for Information Systems and Organizations</i> .	6/30/22	11/15/22	
EPA Improperly Awarded and Managed Information Technology Contracts <a href="#">21-P-0094</a> , March 10, 2021	OMS	10. Create a software license inventory policy, which will include identifying the number of licenses, license-counts authorized, overall costs of licenses, maintenance fees, and contracts used for each licensed software. Track and report savings produced by software licensing inventory and report the savings as part of the Office of Management and Budget's annual Spend Under Management data.	12/31/22		\$1,180
EPA Needs to Substantially Improve Oversight of Its Military Leave Processes to Prevent Improper Payments <a href="#">21-P-0042</a> , December 28, 2020	OMS and OCFO	1. Adopt and implement policies and procedures on military leave and pay requirements that comply with 5 U.S.C. §§ 5538, 6323, and 5519.	4/30/22	7/29/22 10/1/22	
		2. Provide resources for supervisors, timekeepers, and reservists on their roles and responsibilities related to military leave under the law and Agency policies.	4/30/22	7/29/22****	
		3. Establish and implement internal controls that will allow the Agency to monitor compliance with applicable laws, federal guidance, and Agency policies, including periodic internal audits of all military leave, to verify that (a) charges by reservists are correct and supported and (b) appropriate reservist differential and military offset payroll audit calculations are being requested and performed.	6/30/22	7/29/22****	
		4. Require reservists to correct and supervisors to approve military leave time charging errors in PeoplePlus that have been identified during the audit or as part of the Agency's actions related to Recommendations 5 and 6.	9/30/21	3/31/22 7/29/22****	
		5. Recover the approximately \$11,000 in military pay related to unsupported 5 U.S.C. § 6323(a) military leave charges, unless the Agency can obtain documentation to substantiate the validity of the reservists' military leave.	8/31/21	12/15/21 12/30/22	\$11
		6. Submit documentation for the reservists' military leave related to the approximately \$118,000 charged under 5 U.S.C. § 6323(b) to the EPA's payroll provider to perform payroll audit calculations and recover any military offsets that may be due.	8/31/21	12/15/21 12/30/22	\$118
		7. Identify the population of reservists who took unpaid military leave pursuant to 5 U.S.C. § 5538 and determine whether those reservists are entitled to receive a reservist differential. Based on the results of this determination, take appropriate steps to request that the EPA's payroll provider perform payroll audit calculations to identify and pay the amounts that may be due to reservists.	2/28/22	9/30/22****	
		8. For the time periods outside of the scope of our audit (pre-January 2017 and post-June 2019), identify the population of reservists who charged military leave under 5 U.S.C. § 6323(b) or 6323(c) and determine whether military offset was paid by the reservists. If not, review reservists' military documentation to determine whether payroll audit calculations are required. If required, request that the EPA's payroll provider perform payroll audit calculations to identify and recover military offsets that may be due from the reservists under 5 U.S.C. §§ 6323 and 5519.	2/28/22	12/30/22	
	OCFO	9. Report all amounts of improper payments resulting from paid military leave for inclusion in the annual Agency Financial Report, as required by the Payment Integrity Information Act of 2019.	12/1/21	12/1/22	

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\*\*\*\* The EPA has not provided an updated planned completion date.

U—Unresolved when the report was issued but resolved at a later date.

Report title, number, and date	Office	Unimplemented recommendation	The EPA's initial planned completion date (at time of report issuance)	The EPA's revised planned completion dates*	Potential monetary benefits** (in thousands)
EPA Needs to Improve Its Planning and Management of Laboratory Consolidation Efforts <a href="#">21-E-0033</a> , December 7, 2020	OMS	1. Develop and implement procedures that include detailed requirements for planning and managing laboratory consolidation efforts. Requirements should address developing master plans and programs of requirements, tracking and updating cost and schedule estimates, and maintaining decisional documentation.	12/31/20	12/31/21 12/31/22	
EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance <a href="#">20-E-0332</a> , September 28, 2020	OLEM	3. In coordination with all EPA regions, ensure that guidance and planning address deployment of on-scene coordinators in the event of large incidents during pandemics, including overcoming travel restrictions to respond to large incidents.	U	6/30/22 11/1/22 12/30/22	
EPA Needs to Strengthen Controls Over Required Documentation and Tracking of Intergovernmental Personnel Act Assignments <a href="#">20-P-0245</a> , August 10, 2020	OMS	1. Evaluate the EPA's <i>Intergovernmental Personnel Act Policy and Procedures Manual (IPA)</i> , including the checklist, to determine whether the required documents, the consequences for noncompliance, the responsible offices, and the individual roles and responsibilities remain relevant and appropriate, and update the Manual accordingly.	10/15/2021	5/31/22 2/28/23	
		2. Strengthen controls throughout the EPA's Intergovernmental Personnel Act assignment process to verify that required documents are properly submitted and maintained as required by the EPA's <i>Intergovernmental Personnel Act Policy and Procedures Manual (IPA)</i> and that the consequence for nonsubmittal of required documents is enforced.	10/15/2021	5/31/22 2/28/23	
EPA Needs to Improve Its Risk Management and Incident Response Information Security Functions <a href="#">20-P-0120</a> , March 24, 2020	OMS	2. Establish a control to validate that Agency personnel are creating the required plans of action and milestones for weaknesses that are identified from vulnerability testing but not remediated within the Agency's established time frames per the EPA's information security procedures.	6/24/20***	12/31/22	
EPA Needs to Improve Management and Monitoring of Time-Off Awards <a href="#">20-P-0065</a> , December 30, 2019	OMS	1. Revise EPA Manual 3130 A2, <i>Recognition Policy and Procedures Manual</i> , to establish a methodology for determining the equivalent value for time-off awards.	U	10/31/22	
Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRIA Systems Need Improvement <a href="#">19-P-0195</a> , June 21, 2019	OCSP	2. Complete the actions and milestones identified in the Office of Pesticide Programs' <i>PRIA Maintenance Fee Risk Assessment</i> document and associated plan regarding the fee payment and refund posting processes.	12/31/20	12/31/22 6/30/23	
Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel <a href="#">19-P-0155</a> , May 16, 2019	OCFO	1. Evaluate and determine whether the increased airfare costs estimated at \$123,942 related to former Administrator Pruitt's use of first/business-class travel without sufficient justification and proper approval, for the period March 1, 2017, through December 31, 2017, should be recovered and, if so, from which responsible official or officials, and direct recovery of the funds.	U	11/30/21 12/16/22	\$124
		2. For the period January 1, 2018, through his resignation in July 2018, evaluate and determine whether any costs related to former Administrator Pruitt's use of first/business-class travel without sufficient justification and proper approval should be recovered and, if so, from which responsible official or officials, and direct recovery of the funds.	U	6/26/19 12/16/22	

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\*\* Blank cells indicate that no potential monetary benefits were identified.

\*\*\* The EPA closed out the recommendation, but the OIG determined that the corrective action was not completed.

\*\*\*\* The EPA has not provided an updated planned completion date.

U—Unresolved when the report was issued but resolved at a later date.

Report title, number, and date	Office	Unimplemented recommendation	The EPA's initial planned completion date (at time of report issuance)	The EPA's revised planned completion dates*	Potential monetary benefits** (in thousands)
EPA Region 5 Needs to Act on Transfer Request and Petition Regarding Ohio's Concentrated Animal Feeding Operation Permit Program <a href="#">19-N-0154</a> , May 15, 2019	Region 5	1. Issue a decision regarding Ohio's request to transfer from the Ohio Environmental Protection Agency to the Ohio Department of Agriculture its National Pollutant Discharge Elimination System program with respect to Concentrated Animal Feeding Operations and other elements of the program.	3/8/21***	11/23/23 11/30/23	
Improved Management of the Brownfields Revolving Loan Fund Program Is Required to Maximize Cleanups <a href="#">17-P-0368</a> , August 23, 2017	OLEM	1. Develop a policy to reduce balances of available program income of Brownfields Revolving Loan Funds being held by recipients. The policy should establish a time frame for recipients to use or return the funds to the EPA.	3/19/19***	9/30/27	
		8. Develop and implement required training for all regional Brownfields Revolving Loan Fund staff. Have the training include all program policy and guidance relating to maintaining a Brownfields Revolving Loan Fund after the cooperative agreement is closed if program income exists.	3/19/19***	3/31/23	
		14. Develop and implement a method for the Office of Brownfields and Land Revitalization to track closed cooperative agreements with pre- and post-program income.	3/19/19***	12/31/23	
		16. Create a method for the Office of Brownfields and Land Revitalization, and EPA regional managers, to track compliance with reporting requirements for closed cooperative agreements.	3/19/19***	9/30/27	
Enhanced Controls Needed to Prevent Further Abuse of Religious Compensatory Time <a href="#">16-P-0333</a> , September 27, 2016	OMS	3. Develop training on the proper use of Religious Compensatory Time and require all managers approving, and employees using, Religious Compensatory Time to complete the course.	5/30/17***	6/23/23	
Internal Controls Needed to Control Costs of Emergency and Rapid Response Services Contracts, as Exemplified in Region 6 <a href="#">14-P-0109</a> , February 4, 2014	Region 6	3. Direct contracting officers to require that the contractor adjust all its billings to reflect the application of the correct rate to team subcontract other direct costs.	U	9/30/24	
<b>Subtotal</b>		<b>48 unimplemented recommendations</b>			<b>\$48,065</b>
<b>Category 2—Human Health and Environmental Issues</b>					
The EPA Needs to Develop a Strategy to Complete Overdue Residual Risk and Technology Reviews and to Meet the Statutory Deadlines for Upcoming Reviews <a href="#">22-E-0026</a> , March 30, 2022	OAR	1. Perform a workforce analysis to determine the staff and resources needed to meet the statutory deadlines for residual risk and technology reviews, initial technology reviews, and recurring eight-year technology reviews, as well as to complete any such reviews that are overdue.	U	3/31/23	
		2. Develop and implement a strategy to conduct (a) residual risk and technology reviews and recurring technology reviews by the applicable statutory deadlines and (b) any overdue residual risk and technology reviews and recurring technology reviews in as timely a manner as practicable. The strategy should take into account the Agency's environmental justice responsibilities under Executive Order 12898 and other applicable EPA and executive branch policies, procedures, and directives.	U	3/31/24	

**Legend:** \* Blank cells indicate that there have been no revisions to the initial planned completion dates.

\*\* Blank cells indicate that no potential monetary benefits were identified.

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EPA's Title V Program Needs to Address Ongoing Fee Issues and Improve Oversight <a href="#">22-E-0017</a> , January 12, 2022	OAR	1. Coordinate with EPA regions to provide recurring training on Clean Air Act Title V fee laws and regulations to permitting agencies.	6/30/23		
		2. In collaboration with EPA regions, develop and implement a plan to address declining Clean Air Act Title V revenues.	U	12/31/23	
		3. Update the EPA's guidance documents to require regions to establish time frames for permitting authorities to complete corrective actions in program and fee evaluation reports and clear, escalating consequences if timely corrective actions are not completed.	3/31/23		
		4. Update the Clean Air Act Title V guidance documents to establish criteria for when regions must conduct Title V fee evaluations and require a minimum standard of review for fee evaluations.	3/31/23		
		5. Provide training to EPA regional staff on the updated Clean Air Act Title V fee guidance and how to conduct fee evaluations.	6/30/23		
		6. Collaborate with regional staff to identify and make available the regional resources and expertise necessary to conduct fee evaluations.	U	12/31/22	
Authorized State Hazardous Waste Program Inspections and Operations Were Impacted During Coronavirus Pandemic <a href="#">22-E-0009</a> , December 1, 2021	OECA	3. Review Resource Conservation and Recovery Act information system inspection data entered during the coronavirus pandemic to determine the extent off-site compliance-monitoring activities were incorrectly counted as inspections and correct the inspection data in the system as needed.	9/30/22	3/30/23	
		4. Work with all EPA regions to determine why the rate of violations per inspection was reduced during the coronavirus pandemic and the inspection rate for large quantity generators was below historical levels from October 2020 through February 2021.	12/31/22	3/31/23	
		5. Develop policies that define inspection requirements and flexibilities to optimize the capabilities of authorized state programs in future large-scale pandemic or disaster events. These should include mechanisms, consistent with EPA guidance documents, that allow maintenance of normal Resource Conservation and Recovery Act inspection rates while ensuring the safety of enforcement staff.	U	3/31/23	
Total National Reported Clean Air Act Compliance-Monitoring Activities Decreased Slightly During Coronavirus Pandemic, but State Activities Varied Widely <a href="#">22-E-0008</a> , November 17, 2021	OECA	4. Determine and document the conditions or parameters under which the use of remote video to conduct off-site partial compliance evaluations is feasible from a legal, technical, and programmatic perspective.	12/30/22		
		5. Finalize the Remote Video Partial Compliance Evaluation workgroup's standard operating procedures.	12/30/22		
		6. Determine whether and how remote video can be used in conjunction with a document review to qualify as a full-compliance evaluation for purposes of the <i>Clean Air Act Stationary Source Compliance Monitoring Strategy</i> and provide instruction to state and local agencies.	12/30/22		
EPA Needs an Agencywide Strategic Action Plan to Address Harmful Algal Blooms <a href="#">21-E-0264</a> , September 29, 2021	OW	1. Develop an agencywide strategic action plan, including milestones, to direct the EPA's efforts to maintain and enhance a national program to forecast, monitor, and respond to freshwater harmful algal blooms. This plan should incorporate strategies for: (a) identifying knowledge gaps; (b) closing identified knowledge gaps, particularly related to health risks from exposure to cyanotoxins in drinking water and during recreational activities; (c) monitoring and tracking harmful algal blooms; (d) enhancing the EPA's national leadership role in addressing freshwater algal blooms; (e) coordinating EPA activities internally and with states; and (f) assessing the health risks from exposure to cyanotoxins in drinking water and during recreational activities and establishing additional criteria, standards, and advisories, as the scientific information allows.	1/31/23		

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		3. Mindful that the EPA has substantial work to complete before publishing final numeric water quality criteria recommendations for nitrogen and phosphorus under the Clean Water Act for rivers and streams, establish a plan, including milestones and identification of resource needs, for developing and publishing those criteria recommendations.	U	4/30/23	
		4. Assess and evaluate the available information on human health risks from exposure to cyanotoxins in drinking water and recreational waters to determine whether actions under the Safe Drinking Water Act are warranted.	12/31/22		
Pandemic Highlights Need for Additional Tribal Drinking Water Assistance and Oversight in EPA Regions 9 and 10 <a href="#">21-E-0254</a> , September 27, 2021	Region 9	3. Develop and implement a plan to prioritize and address the recommendations identified in the 2019 file review for Region 9.	U	9/30/23	
		5. Develop a workforce analysis to address staff workload and the skills needed for the direct implementation of the tribal drinking water program.	U	9/30/23	
EPA's Endocrine Disruptor Screening Program Has Made Limited Progress in Assessing Pesticides <a href="#">21-E-0186</a> , July 28, 2021	OCSP	1. Issue Tier 1 test orders for each List 2 chemical or publish an explanation for public comment on why Tier 1 data are no longer needed to characterize a List 2 chemical's endocrine-disruption activity.	9/30/25		
		2. Determine whether the EPA should incorporate the Endocrine Disruptor Screening Program Tier 1 tests (or approved new approach methodologies) into the pesticide registration process as mandatory data requirements under 40 C.F.R. § 158 for all pesticide use patterns.	9/30/24		
		3. Issue List 1–Tier 2 test orders for the 18 pesticides in which additional Tier 2 testing was recommended or publish an explanation for public comment on why Tier 2 data are no longer needed to characterize the endocrine-disruption activity for each of these 18 pesticides.	9/30/24		
		4. Issue for public review and comment both the Environmental Fate and Effects Division's approach for the reevaluation of List 1–Tier 1 data and the revised List 1–Tier 2 wildlife recommendations.	12/31/23		
		5. Develop and implement an updated formal strategic planning document, such as the <i>Comprehensive Management Plan</i> .	9/30/22	12/31/22	
		6. Develop performance measures, with reasonable time frames, to document progress toward and achievement of milestones or targets. Specifically, the Endocrine Disruptor Screening Program should consider at least one performance measure that tracks progress in testing pesticides for human endocrine disruptor activity.	10/1/24		
		7. Conduct annual internal program reviews of the Endocrine Disruptor Screening Program.	9/30/22	6/30/23	
		8. Complete and publish the Endocrine Disruptor Screening Program's response(s) to 2015 Federal Register notice comments and its related white paper.	12/31/21	4/30/22 10/31/22	
		10. To increase external communication and transparency, update the Endocrine Disruptor Screening Program website, including the program timeline, and publish any relevant program documents.	12/30/21	4/30/22 10/31/22	
EPA Should Conduct More Oversight of Synthetic-Minor-Source Permitting to Assure Permits Adhere to EPA Guidance <a href="#">21-P-0175</a> , July 8, 2021	OAR	1. Update Agency guidance on practical enforceability to more clearly describe how the technical accuracy of a permit limit should be supported and documented. In updating such guidance, the Office of Air and Radiation should consult and collaborate with the Office of Enforcement and Compliance Assurance, the Office of General Counsel, and the EPA regions.	10/31/23		

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		2. In consultation with the EPA regions, develop and implement an oversight plan to include: (a) an initial review of a sample of synthetic-minor-source permits in different industries that are issued by state, local, and tribal agencies to assess whether the permits adhere to EPA guidance on practical enforceability, including limits that are technically accurate, have appropriate time periods, and include sufficient monitoring, record-keeping, and reporting requirements; (b) a periodic review of a sample of synthetic-minor-source permits to occur, at a minimum, once every five years; and (c) procedures to resolve any permitting deficiencies identified during the initial and periodic reviews.	10/31/24		
		3. Assess recent EPA studies of enclosed combustion device performance and compliance monitoring and other relevant information during the next statutorily required review of 40 C.F.R Part 60 Subparts OOOO and OOOOa to determine whether revisions are needed to monitoring, record-keeping, and reporting requirements for enclosed combustion devices to assure continuous compliance with associated limits, and revise the regulatory requirements as appropriate.	12/31/24		
		4. Revise the Agency's guidance to communicate its key expectations for synthetic-minor-source permitting to state and local agencies.	10/31/24		
		5. Identify all state, local, and tribal agencies in which Clean Air Act permit program implementation fails to adhere to the public participation requirements for synthetic-minor-source permit issuance and take appropriate steps to assure the identified states adhere to the public participation requirements.	12/31/23		
EPA Deviated from Typical Procedures in Its 2018 Dicamba Pesticide Registration Decision <a href="#">21-E-0146</a> , May 24, 2021	OCSPP	3. Annually conduct and document training for all staff and senior managers and policy makers to affirm the office's commitment to the <i>Scientific Integrity Policy</i> and principles and to promote a culture of scientific integrity.	3/31/22	3/31/26 †	
		† OCSPP completed this corrective action on February 16, 2022. That was the date OCSPP held its first annual training series on the office's commitment to the <i>Scientific Integrity Policy</i> and principles and to promote a culture of scientific integrity. March 31, 2026, is OCSPP's planned final training date. However, OCSPP completed corrective actions upon the date of its first training on February 16, 2022.			
Staffing Constraints, Safety and Health Concerns at EPA's National Enforcement Investigations Center May Compromise Ability to Achieve Mission <a href="#">21-P-0131</a> , May 12, 2021	OECA	9. Develop and incorporate metrics on the National Enforcement Investigations Center work environment and culture into Office of Criminal Enforcement, Forensics, and Training senior management performance standards, such as results from the annual Federal Employee Viewpoint Survey, periodic culture audits, or other methods to measure progress.	U	6/28/24	
		10. Develop and incorporate metrics that address work environment and culture into National Enforcement Investigations Center senior management performance standards.	U	6/28/24	
EPA Helps States Reduce Trash, Including Plastic, in U.S. Waterways but Needs to Identify Obstacles and Develop Strategies for Further Progress <a href="#">21-P-0130</a> , May 11, 2021	OW	1. Evaluate the obstacles to implementing the Clean Water Act to control trash in U.S. waterways and provide a public report describing those obstacles.	12/31/21	6/30/22 2/28/23	
		2. Develop and disseminate strategies to states and municipalities for addressing the obstacles identified in the evaluation from Recommendation 1. These strategies may include guidance regarding how to develop narrative water quality criteria, consistent assessment and measurement methodologies, and total maximum daily loads for trash pollution.	4/30/23		

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EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health <a href="#">21-P-0129</a> , May 6, 2021	OAR	2. Conduct new residual risk reviews for Group I polymers and resins that cover neoprene production, synthetic organic chemical manufacturing industry, polyether polyols production, commercial sterilizers, and hospital sterilizers using the new risk values for chloroprene and ethylene oxide and revise the corresponding National Emission Standards for Hazardous Air Pollutants, as needed.	U	9/30/24	
		3. Revise National Emission Standards for Hazardous Air Pollutants for chemical manufacturing area sources to regulate ethylene oxide and conduct a residual risk review to ensure that the public is not exposed to unacceptable risks.	U	9/30/28	
		4. Conduct overdue technology reviews for Group I polymers and resins that cover neoprene production, synthetic organic chemical manufacturing industry, commercial sterilizers, hospital sterilizers, and chemical manufacturing area sources, which are required to be completed at least every eight years by the Clean Air Act.	9/30/24		
Improved Review Processes Could Advance EPA Regions 3 and 5 Oversight of State-Issued National Pollutant Discharge Elimination System Permits <a href="#">21-P-0122</a> , April 21, 2021	Region 3	1. Review the modified National Pollutant Discharge Elimination System mining permits issued by West Virginia based on the 2019 revisions to its National Pollutant Discharge Elimination System program to ensure that no backsliding has occurred, including for discharges of ionic pollution, in accordance with EPA Region 3's approval letter dated March 27, 2019. If a permit does not contain record documentation for the reasonable potential analysis or otherwise allows backsliding, alert West Virginia of the permit inadequacies.	U	3/31/22 <sup>†</sup> 1/31/23	
		2. Review the modified National Pollutant Discharge Elimination System mining permits issued by West Virginia based on the 2019 revisions to its National Pollutant Discharge Elimination System program to determine whether the permits contain effluent limits for ionic pollution and other pollutants that are or may be discharged at a level that causes, has the reasonable potential to cause, or contributes to an excursion above any applicable water quality standard, as required by Clean Water Act regulations. If a permit lacks required effluent limits, take appropriate action to address such deficiencies.	U	12/31/22 <sup>†</sup> 1/31/25	
		3. Develop a formal internal operating procedure to facilitate timely permit reviews and transmission of EPA comments to states.	U	3/31/22 <sup>†</sup> 10/31/22	
	<sup>†</sup> These dates were provided to the OIG by Region 3 in its June 17, 2021 response to the OIG's final report. The OIG accepted the proposed corrective action and planned completion date for Recommendation 3, while Recommendations 1 and 2 remained unresolved. The OIG and Region 3 corresponded several times about Recommendations 1 and 2, including a briefing held by Region 3 on October 25, 2021. In a memorandum dated December 13, 2021, the OIG accepted Region 3's proposed corrective actions to address Recommendations 1 and 2 but did not receive revised planned completion dates. After the OIG accepted the proposed corrective actions for Recommendations 1 and 2, Region 3 provided revised planned completion dates, which are reflected above.				
	Region 5	4. Review and provide written input on any National Pollutant Discharge Elimination System permit prepared for reissuance by the Minnesota Pollution Control Agency for the PolyMet Mining Inc. NorthMet project, if applicable, as appropriate pursuant to the requirements of the Clean Water Act, National Pollutant Discharge Elimination System regulations, the Region 5 National Pollutant Discharge Elimination System permit review standard operating procedure, and the memorandum of agreement between EPA Region 5 and the Minnesota Pollution Control Agency.	11/30/23		

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EPA Does Not Consistently Monitor Hazardous Waste Units Closed with Waste in Place or Track and Report on Facilities That Fall Under the Two Responsible Programs <a href="#">21-P-0114</a> , March 29, 2021	OECA	2. In collaboration with the Office of Land and Emergency Management, establish mechanisms to ensure that all inspections are completed within the required time frame of two years for operating treatment, storage, or disposal facilities or the policy time frame of three years for nonoperating treatment, storage, or disposal facilities.	U	3/29/24	
	OLEM	4. Develop and implement controls to verify that the Superfund program deferrals to the Resource Conservation and Recovery Act are added to RCRAInfo for further Resource Conservation and Recovery Act attention, as necessary.	9/30/23		
		5. Develop and maintain a crosswalk of Superfund Enterprise Management System and corresponding RCRAInfo identification numbers.	U	12/31/22	
		6. Develop and implement controls to identify and eliminate overlap of environmental indicators between Resource Conservation and Recovery Act Corrective Action and Superfund Programs and include this information in public queries, such as <i>Cleanups in My Community</i> .	U	3/31/23	
Region 2's Hurricanes Irma and Maria Response Efforts in Puerto Rico and U.S. Virgin Islands Show the Need for Improved Planning, Communications, and Assistance for Small Drinking Water Systems <a href="#">21-P-0032</a> , December 3, 2020	Region 2	2. Develop and implement a supplement to Region 2's emergency response plan to describe and address the specific geographic, logistical, and cultural norms applicable to disaster response in Puerto Rico and the U.S. Virgin Islands. This supplement should include local EPA staff roles and responsibilities, as well as address the likely limitations to transportation, communications, and power in the aftermath of disasters.	6/30/23		
		3. In coordination with the Office of Water, implement America's Water Infrastructure Act in Puerto Rico and the U.S. Virgin Islands by: (a) developing and implementing a strategy to provide training, guidance, and assistance to small drinking water systems as they improve their resilience and (b) establishing a process for small drinking water systems to apply for America's Water Infrastructure Act grants. This process should include (1) implementing the EPA's May 2020 guidance provided to small drinking water systems regarding resilience assessments and (2) establishing a public information campaign to inform small drinking water systems of the America's Water Infrastructure Act grant opportunity, qualifying requirements, and application deadlines.	12/31/22		
Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination <a href="#">20-E-0333</a> , September 28, 2020	OGC	1. Develop and implement a plan to coordinate relevant Agency program, regional, and administrative offices with the External Civil Rights Compliance Office to develop guidance on permitting and cumulative impacts related to Title VI.	U	9/30/22 9/30/23	
		2. Develop and implement a plan to complete systematic compliance reviews to determine full compliance with the Title VI program.	U	9/30/22 12/31/22	
		4. Verify that EPA funding applicants address potential noncompliance with Title VI with a written agreement before the funds are awarded.	U	9/30/22 1/1/23	
		5. Determine how to use existing or new data to identify and target funding recipients for proactive compliance reviews, and develop or update policy, guidance, and standard operating procedures for collecting and using those data.	U	3/31/23 9/30/23	
		6. Develop and deliver training for the deputy civil rights officials and EPA regional staff that focuses on their respective roles and responsibilities within the EPA's Title VI program.	U	3/31/22 9/30/23	
EPA Needs to Improve Oversight of How States Implement Air Emissions Regulations for Municipal Solid Waste Landfills <a href="#">20-P-0236</a> , July 30, 2020	Region 6	3. Assist the State of Arkansas in developing and submitting a state plan to implement the 2016 municipal solid waste landfill Emission Guidelines. If Arkansas does not submit a state plan, implement the federal plan for the 2016 municipal solid waste landfill Emission Guidelines once the federal plan is effective.	6/30/22	12/31/22	

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	OAR	4. Develop and implement a process for the periodic review of municipal solid waste landfill design capacity information and Title V permit lists to identify municipal solid waste landfills with design capacities over the applicable threshold that have not applied for a Title V permit.	U	9/30/21 12/31/22	
Further Efforts Needed to Uphold Scientific Integrity Policy at EPA <a href="#">20-P-0173</a> , May 20, 2020	ORD/ Science Advisor	6. In coordination with the assistant administrator for Mission Support, complete the development and implementation of the electronic clearance system for scientific products across the Agency.	6/30/22	6/30/24	
		7. With the assistance of the Scientific Integrity Committee, finalize and release the procedures for addressing and resolving allegations of a violation of the Scientific Integrity Policy, and incorporate the procedures into scientific integrity outreach and training materials.	9/30/20	4/30/22 6/30/22 3/31/23	
		8. With the assistance of the Scientific Integrity Committee, develop and implement a process specifically to address and resolve allegations of Scientific Integrity Policy violations involving high profile issues or senior officials, and specify when this process should be used.	6/30/21	6/30/22 3/31/23	
EPA's Processing Times for New Source Air Permits in Indian Country Have Improved, but Many Still Exceed Regulatory Time Frames <a href="#">20-P-0146</a> , April 22, 2020	OAR	1. Implement a system that is accessible to both the EPA and the applicants to track the processing of all tribal-New-Source-Review permits and key permit dates, including application received, application completed, draft permit issued, public comment period (if applicable), and final permit issuance.	9/30/21	9/30/22 9/30/23	
		2. Establish and implement an oversight process to verify that the regions update the tribal-New-Source-Review permit tracking system on a periodic basis with the correct and required information.	3/31/22	9/30/22 9/30/23	
Management Alert: Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns <a href="#">20-N-0128</a> , March 31, 2020	ADA	1. Improve and continue to implement ongoing risk communication efforts by promptly providing residents in all communities near the 25 ethylene oxide-emitting facilities identified as high-priority by the EPA with a forum for an interactive exchange of information with the EPA or the states regarding health concerns related to exposure to ethylene oxide.	U	5/31/21 <sup>†</sup>	
		<sup>†</sup> According to information provided by EPA in September 2022, the Agency plans to complete their outreach efforts in November 2022. We will assess the status of this recommendation once the corrective actions are completed.			
EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health <a href="#">19-P-0318</a> , September 25, 2019	OW	5. Update and revise the 2010 <i>Revised State Implementation Guidance for the Public Notification Rule</i> to include: a. Public notice delivery methods that are consistent with regulations. b. Information on modern methods for delivery of public notice.	6/30/20	9/30/22****	
		6. Update and revise the 2010 <i>Public Notification Handbooks</i> to include: a. Public notice delivery methods that are consistent with regulations. b. Information on modern methods for delivery of public notice. c. Public notice requirements for the latest drinking water regulations. d. Procedures for public water systems to achieve compliance after violating a public notice regulation. e. Up-to-date references to compliance assistance tools. f. Additional resources for providing public notice in languages other than English.	9/30/20	9/30/22****	
More Effective EPA Oversight Is Needed for Particulate Matter Emissions Compliance Testing <a href="#">19-P-0251</a> , July 30, 2019	Region 10	6. Develop and implement controls to assess delegated agencies' stack testing oversight activities.	3/31/22	12/21/22 12/31/22	
EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance <a href="#">19-P-0207</a> , June 27, 2019	OAR	1. Develop and implement electronic checks in the EPA's Emissions Collection and Monitoring Plan System or through an alternative mechanism to retroactively evaluate emissions and quality assurance data in instances where monitoring plan changes are submitted after the emissions and quality assurance data have already been accepted by the EPA.	3/31/25		

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EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and the Environment <a href="#">19-P-0002</a> , November 15, 2018	OW	3. Complete development of the probabilistic risk assessment tool and screening tool for biosolids land application scenarios.	12/31/21	3/31/23	
		4. Develop and implement a plan to obtain the additional data needed to complete risk assessments and finalize safety determinations on the 352 identified pollutants in biosolids and promulgate regulations as needed.	12/31/22		
		6. Publish guidance on the methods for the biosolids pathogen alternatives 3 and 4.	12/31/20	5/31/21 12/31/21 7/1/22 3/31/23	
		8. Issue updated and consistent guidance on biosolids fecal coliform sampling practices.	12/31/20	5/31/21 12/31/21 7/1/22 3/31/23	
EPA Needs a Comprehensive Vision and Strategy for Citizen Science that Aligns with Its Strategic Objectives on Public Participation <a href="#">18-P-0240</a> , September 5, 2018	DA	2. Through appropriate EPA offices, direct completion of an assessment to identify the data management requirements for using citizen science data and an action plan for addressing those requirements, including those on sharing and using data, data format/standards, and data testing/validation.	12/31/20	3/31/23	
	ORD	4. Build capacity for managing the use of citizen science, and expand awareness of citizen science resources, by: a. Finalizing the checklist on administrative and legal factors for Agency staff to consider when developing citizen science projects, as well as identifying and developing any procedures needed to ensure compliance with steps in the checklist. b. Conducting training and/or marketing on the EPA's citizen science intranet site for program and regional staff in developing projects. c. Finalizing and distributing materials highlighting project successes and how the EPA has used results of its investment in citizen science.	12/31/20	12/31/21 11/1/22	
Management Weaknesses Delayed Response to Flint Water Crisis <a href="#">18-P-0221</a> , July 19, 2018	OECA <sup>†</sup>	6. Provide regular training for EPA drinking water staff, managers and senior leaders on Safe Drinking Water Act tools and authorities; state and agency roles and responsibilities; and any Safe Drinking Water Act amendments or Lead and Copper Rule revisions.	7/7/21***	12/30/22	
		8. Create a system that tracks citizen complaints and gathers information on emerging issues. The system should assess the risk associated with the complaints, including efficient and effective resolution.	7/7/21***	4/28/23	
		<sup>†</sup> OECA and the OW were the responsible offices for Recommendations 6 and 8. The OIG conducted a follow-up audit (Report No. <a href="#">22-P-0046</a> ) and found that the OW had completed its corrective actions but that OECA had not. Therefore, the OW has been removed as a responsible office for these recommendations.			
EPA Needs to Evaluate the Impact of the Revised Agricultural Worker Protection Standard on Pesticide Exposure Incidents <a href="#">18-P-0080</a> , February 15, 2018	OCSP	1. In coordination with the Office of Enforcement and Compliance Assurance, develop and implement a methodology to evaluate the impact of the revised Agricultural Worker Protection Standard on pesticide exposure incidents among target populations.	U	12/31/22 12/31/23	
Additional Measures Can Be Taken to Prevent Deaths and Serious Injuries from Residential Fumigations <a href="#">17-P-0053</a> , December 12, 2016	OCSP	3. Conduct an assessment of clearance devices to validate their effectiveness in detecting required clearance levels, as part of the Office of Pesticide Programs ongoing reevaluation of structural fumigants.	11/30/17	8/31/21 12/31/22 6/30/23	

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EPA Has Not Met Certain Statutory Requirements to Identify Environmental Impacts of Renewable Fuel Standard <a href="#">16-P-0275</a> , August 18, 2016	OAR	2. Complete the anti-backsliding study on the air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act.	9/30/24		
		3. Determine whether additional action is needed to mitigate any adverse air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act.	9/30/24		
EPA Has Not Met Statutory Requirements for Hazardous Waste Treatment, Storage and Disposal Facility Inspections, but Inspection Rates Are High <a href="#">16-P-0104</a> , March 11, 2016	OECA	1. Implement management controls to complete the required TSDF inspections.	3/19/19***	3/29/24	
EPA's Endocrine Disruptor Screening Program Should Establish Management Controls to Ensure More Timely Results <a href="#">11-P-0215</a> , May 3, 2011	OCSPP	4. Develop short-term, intermediate, and long-term outcome performance measures, and additional output performance measures, with appropriate targets and timeframes, to measure the progress and results of the program.	9/23/13***	10/1/24	
		5. Develop and publish a comprehensive management plan for EDSP, including estimates of EDSP's budget requirements, priorities, goals, and key activities covering at least a 5-year period.	9/23/13***	12/31/22	
		6. Annually review the EDSP program results, progress toward milestones, and achievement of performance measures, including explanations for any missed milestones or targets.	9/23/13***	6/30/23	
EPA Should Revise Outdated or Inconsistent EPA-State Clean Water Memoranda of Agreement <a href="#">10-P-0224</a> , September 14, 2010	OW	2-2. Develop a systematic approach to identify which states have outdated or inconsistent memorandums of agreements; renegotiate and update those Memorandums of Agreements using the Memorandum of Agreements template; and secure the active involvement and final, documented concurrence of headquarters to ensure national consistency.	9/28/18	9/30/20 9/30/22 9/30/23	
Making Better Use of Stringfellow Superfund Special Accounts <a href="#">08-P-0196</a> , July 9, 2008	Region 9	2. Reclassify or transfer to the Trust Fund, as appropriate, \$27.8 million (plus any earned interest less oversight costs) of the Stringfellow special accounts in annual reviews, and at other milestones including the end of fiscal year 2010, when the record of decision is signed and the final settlement is achieved.	12/31/12	9/30/23 9/30/26	\$27,800
<b>Subtotal</b>		<b>86 unimplemented recommendations</b>			<b>\$27,800</b>
<b>Total</b>		<b>134 unimplemented recommendations</b>			<b>\$75,865</b>

**Legend:** \* Blank cells indicate that there have been no revisions to the initial planned completion dates.

\*\* Blank cells indicate that no potential monetary benefits were identified.

\*\*\* The EPA closed out the recommendation, but the OIG determined that the corrective action was not completed.

\*\*\*\* The EPA has not provided an updated planned completion date.

U—Unresolved when the report was issued but resolved at a later date.

## CSB Reports with Unimplemented Recommendations

*This table provides the full text of recommendations issued to the CSB prior to this semiannual period that remain unimplemented, along with the planned completion dates provided by the CSB when the associated final reports were issued and any subsequent revisions made by the CSB to those planned completion dates.*

*This table reflects the status of recommendations as of September 30, 2022.*

Report title, number, and date	Office	Unimplemented recommendation	CSB's initial planned completion date at time of report issuance	CSB's revised planned completion date(s)*	Potential monetary benefits (in thousands)**
<b>Category 1— Management Operations</b>					
Contractor-Produced Report: CSB Is at Increased Risk of Losing Significant Data and Is Vulnerable to Exploitation <a href="#">22-E-0025</a> , March 29, 2022	CSB	2. Immediately restore off-site storage of backup tapes and implement a strategy that will ensure that the Agency consistently stores backups of its systems at an off-site location. Additionally, explore alternative methods of off-site backup that can be performed automatically and do not require physical intervention by CSB personnel, such as storing backups in the cloud.	7/15/22	8/1/22 12/31/22	
CSB's Information Security Program Is Not Consistently Implemented; Improvements Are Needed to Address Four Weaknesses <a href="#">21-E-0071</a> , February 9, 2021	CSB	1. Complete the Risk Assessment process as required by NIST 800-37, re-evaluate the Risk Management Framework to make it more fluent to leverage day-to-day processes in place for completing the risk assessment, and determine how to best implement an organization-wide governance process for monitoring and reporting on risks.	4/30/21	9/30/22 12/31/22	
		2. Document the process in place to monitor required flaw remediation to resolution and enhance the flaw remediation process to require approvals if risks cannot be mitigated to an acceptable level in a timely manner. In addition, develop timeframes and monitoring on the timeliness of applying patch updates.	1/31/21	9/30/22 10/31/22	
CSB Discontinued Information Recovery Testing and Off-Site Backup Storage During the Coronavirus Pandemic <a href="#">21-E-0016</a> , November 18, 2020	CSB	1. Test its disaster recovery plan at least annually.	12/30/20	6/30/22 12/31/22	
<b>Total</b>		<b>4 unimplemented recommendations</b>			<b>\$0</b>

**Legend:** \* Blank cells indicate that there have been no revisions to the initial planned completion dates.

\*\* Blank cells indicate that no potential monetary benefits were identified.



## Appendix 4—Closed Investigations Involving Senior Employees

### For Reporting Period Ending September 30, 2022

Section 5(a)(19) of the Inspector General Act requires a report on each investigation involving a senior government employee in which allegations of misconduct were substantiated. Section 5(a)(22) of the Act requires a detailed description of the particular circumstances of any investigation conducted by the OIG involving a senior government employee that is closed and was not disclosed to the public. Details on each investigation conducted by the OIG involving senior employees closed during the semiannual reporting period ending September 30, 2022, are provided below.

#### **CASE NUMBER: OI-NE-2021-ADM-0043**

Additional information was received about a previously closed case involving an EPA GS-15 employee who allegedly committed time-and-attendance fraud by working during EPA duty hours at a restaurant that the employee owned. The investigation was reopened to review the additional information and was subsequently reclosed after it was determined that none of the additional information provided was new. The original investigation, which was reported in Appendix 4 of Report No. [EPA-350-R-21-002](#), *Semiannual Report to Congress: April 1, 2021–September 30, 2021*, dated November 24, 2021, was referred to the EPA's Labor and Employee Relations Division.

#### **CASE NUMBER: OI-ECD-2022-CCR-0023**

An EPA GS-15 employee connected his EPA-issued computer to his personal computer for many years to back up files. The investigation determined that files were moved from his EPA laptop to a personal device; however, the investigation was unable to determine what files were moved to the personal device. The employee retired from the EPA during the course of the investigation and no longer has access to an EPA computer or the network.

#### **CASE NUMBER: OI-HQ-2020-CFD-0079**

An EPA SES employee allegedly improperly directed a sole-source contract through the EPA Office of Water and the EPA Office of Homeland Security. The investigation determined that the allegation was not supported.

#### **CASE NUMBER: OI-AT-2020-AFD-0038**

An EPA GS-15 employee allegedly engaged in criminal activity with other EPA staff and contractors involved with an EPA project in Region 4. The investigation did not reveal any evidence that the GS-15 employee received money from the contractor, nor was there evidence to suggest that the contractor dictated the site design to obtain the contract. It was also alleged that the GS-15 EPA employee attended parties thrown by the contractor where alcohol was served. The investigation determined that attending a party where alcohol was served does not constitute a violation of the ethics standard. Based on the totality of information collected and reviewed, there was insufficient evidence to substantiate or support any of the allegations.

#### **CASE NUMBER: OI-HQ-2020-ADM-0081**

An EPA SES employee allegedly had an inappropriate relationship with an EPA contractor and modified contracts so they would be solely awarded to that contractor. The investigation determined that the allegation was not supported.

#### **CASE NUMBER: OI-HQ-2018-ADM-0130**

An EPA SES employee conspired with an EPA GS-15 employee to continue paying a former EPA employee after that individual's employment was terminated by the EPA. During the investigation, it was determined that another former EPA employee also received pay after that individual's employment was terminated by the EPA. The investigation determined that the SES and GS-15 employees, both of whom worked in the Office of the Administrator, made material misrepresentations so that the EPA would continue paying the two former employees. The total loss to the government for the post-termination salary payments was \$37,913.23. The SES employee also helped arrange an illegal pay increase and preference transfer to an alternate location that was in a different city and state than the GS-15 employee's assigned regional office. The loss to the government for the illegal pay increase was \$40,575.11. While at this alternate location, the GS-15 employee committed time-and-attendance fraud. The loss to the government for the time-and-attendance fraud was \$55,150.44. The total loss to the government for the actions of the SES and GS-15 employees was \$133,638.78.

#### **CASE NUMBER: OI-HQ-2020-ADM-0093**

A former EPA SES employee allegedly failed to disclose a potential conflict of interest on the U.S. Office of Government Ethics Form 278e for public financial disclosure. The investigation did not support a willful violation of the Form 278e reporting responsibilities.

## Appendix 5—Peer Reviews Conducted

### For Reporting Period Ending September 30, 2022

Section 5(a)(14) of the Inspector General Act requires an appendix containing the results of any peer review conducted of the EPA OIG by another OIG during the reporting period or, if no such peer review was conducted, a statement identifying the date of the last peer review conducted of the EPA OIG by another OIG. Section 5(a)(15) of the Act requires a list of any outstanding recommendations from any peer review conducted of the EPA OIG by another OIG that have not been fully implemented. Section 5(a)(16) of the Act requires a list of all peer reviews conducted by the EPA OIG of another OIG during the reporting period, including a list of any recommendations from any previous peer review that remain outstanding.

The EPA OIG is continuing its external peer review of the audit organization of the Department of Agriculture OIG. Our review covers the period from April 1, 2020, through March 31, 2021. This review is being conducted in accordance with generally accepted government auditing standards and guidelines established by the Council of the Inspectors General on Integrity and Efficiency.

The following are the most recent peer reviews conducted by another OIG of the EPA OIG. There are no outstanding recommendations from these peer reviews.

#### Audits

The most recent peer review report on the EPA OIG was issued on April 15, 2021, by the Treasury Inspector General for Tax Administration OIG. That review, covering a three-year period ending September 30, 2020, found that the EPA OIG's system of quality control was suitably designed and complied with to provide the EPA OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. The EPA OIG received an external peer review rating of *pass*.

#### Investigations

The General Services Administration OIG completed the most recently mandated Council of the Inspectors General on Integrity and Efficiency quality assurance review of the EPA OIG Office of Investigations and issued its report on June 11, 2018. The General Services Administration OIG identified no deficiencies and found that internal safeguards and management procedures were compliant with quality standards.

## Appendix 6—OIG Mailing Addresses and Telephone Numbers

### Headquarters

U.S. Environmental Protection Agency  
Office of Inspector General  
1200 Pennsylvania Avenue, NW (2410T)  
Washington, D.C. 20460  
(202) 566-0847

### Offices

#### Region 1

U.S. Environmental Protection Agency  
Office of Inspector General  
5 Post Office Square (Mail Code: 15-1)  
Boston, MA 02109-3912  
Audit/Evaluation: (617) 918-1475  
Investigations: (984) 278-2669

#### Region 2

U.S. Environmental Protection Agency  
Office of Inspector General  
290 Broadway, Suite 1520  
New York, NY 10007  
Audit/Evaluation: (212) 637-3049  
Investigations: (212) 637-3040

#### Region 3

U.S. Environmental Protection Agency  
Office of Inspector General  
Four Penn Center  
1600 John F. Kennedy Boulevard, 4th Floor  
Philadelphia, PA 19103-2029  
Audit: (215) 814-2326  
Evaluation: (215) 814-2349  
Investigations: (215) 814-2470

#### Region 4

U.S. Environmental Protection Agency  
Office of Inspector General  
61 Forsyth Street, SW  
Atlanta, GA 30303  
Audit/Evaluation: (404) 562-9830  
Investigations: (404) 562-9857

#### Region 5

U.S. Environmental Protection Agency  
Office of Inspector General  
77 West Jackson Boulevard  
13th Floor (IA-13J)  
Chicago, IL 60604  
Audit: (312) 886-3106  
Evaluation: (312) 353-4353  
Investigations: (646) 678-0969

#### Region 6

U.S. Environmental Protection Agency  
Office of Inspector General Suite 500  
1201 Elm Street  
Dallas, TX 75270  
Audit/Evaluation: (214) 665-6735  
Investigations: (214) 665-2249

#### Region 7

U.S. Environmental Protection Agency  
Office of Inspector General  
11201 Renner Boulevard  
Lenexa, KS 66219  
Audit/Evaluation: (913) 551-7878  
Investigations: (913) 551-7420

#### Region 8

U.S. Environmental Protection Agency  
Office of Inspector General  
1595 Wynkoop Street, 4th Floor  
Denver, CO 80202  
Audit/Evaluation: (303) 312-6871  
Investigations: (303) 312-6463

#### Region 9

U.S. Environmental Protection Agency  
Office of Inspector General  
75 Hawthorne Street (IGA-1-2)  
8th Floor  
San Francisco, CA 94105  
Audit/Evaluation: (415) 947-4527  
Investigations: (415) 947-4506

#### Region 10

U.S. Environmental Protection Agency  
Office of Inspector General  
Mail Code 17-H13  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3140  
Audit: (206) 514-0094  
Evaluation: (206) 553-2999  
Investigations: (206) 553-6116

#### Cincinnati

U.S. Environmental Protection Agency  
Office of Inspector General  
26 West Martin Luther King Drive  
Cincinnati, OH 45268-7001  
Audit/Evaluation: (513) 487-2363  
Investigations: (224) 935-6847

#### Research Triangle Park

U.S. Environmental Protection Agency  
Office of Inspector General  
Mail Drop N283-01  
Research Triangle Park, NC 27711  
Audit: (919) 541-1030  
Evaluation: (919) 541-3601  
Investigations: (919) 541-3668