



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

OFFICE OF
INSPECTOR GENERAL

March 24, 2023

MEMORANDUM

SUBJECT: Notification of Audit:
Hotline: Combined Sewage Overflow Tanks at the Gowanus Canal Superfund Site
Project No. OA-FY23-0060

FROM: Erica Hauck, Acting Director
Pollution Control and Cleanup Directorate
Office of Audit

TO: Lisa Garcia, Regional Administrator,
Region 2

The U.S. Environmental Protection Agency Office of Inspector General plans to begin fieldwork on an audit of the Gowanus Canal Superfund site in Brooklyn, New York. This audit addresses complaints submitted to the OIG Hotline. This audit also addresses the following fiscal year 2023 [top management challenge](#) for the Agency: managing business operations and resources.

The OIG's objective is to determine the status of the combined sewer overflow, or CSO, tank construction at the Gowanus Canal Superfund site. We plan to conduct work in EPA Region 2; however, we may also include work at EPA headquarters, in the City of New York, and at the New York State Department of Environmental Conservation. We will use applicable generally accepted government auditing standards to conduct our audit. The anticipated benefits of this audit include enhanced management and oversight of the cleanup efforts at the Gowanus Canal Superfund site to protect human health and the environment.

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

To expedite our audit, please be ready to provide the following information at the entrance conference:

- Any documentation of milestones for the completion of CSO tank installations.
- Any existing CSO tank design plans.
- Locations of properties, to include addresses or coordinates, where the CSO tanks will be constructed.
- Status of any contract awards for the Gowanus CSO tank construction.

- Press releases or other public communications regarding the progress of the CSO tank construction.
- Internal EPA review documents related to the CSO tank construction.
- Region 2’s assessment of the City of New York’s compliance with the 2014, 2016 and 2021 administrative orders.
- Information about any more recent administrative orders related to Gowanus CSOs or any orders that may be in progress.
- Any other project documentation related to the Gowanus CSO tank construction that is not listed above.
- List of key and relevant contacts in Region 2, the New York State Department of Environmental Conservation, and the City of New York.
- Any recent enforcement orders related to the Gowanus CSO tank construction.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. Consistent with the IG Act, we may report unresolved access matters to the administrator and to Congress.

We will post this memorandum on our public website at www.epa.gov/oig. Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this audit should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the “OIG Hotline” [webpage](#).

cc: Janet McCabe, Deputy Administrator
 Dan Utech, Chief of Staff, Office of the Administrator
 Jon Monger, Assistant Deputy Administrator
 Wesley J. Carpenter, Deputy Chief of Staff for Management, Office of the Administrator
 Walter Mugdan, Deputy Regional Administrator
 Olivia C. Glenn, Senior Advisor for Equity and Chief of Staff, Office of the Administrator,
 Region 2
 Susan Perkins, Agency Follow-Up Coordinator
 Andrew LeBlanc, Agency Follow-Up Coordinator
 José Kercado, Agency Follow-Up Coordinator
 Maria Michalos, Acting Associate Administrator for Public Affairs
 Lance McCluney, Director, Office of Administrative and Executive Services, Office of
 the Administrator
 Arlene Chin, Audit Follow-Up Coordinator, Region 2

Sean W. O'Donnell, Inspector General
Nicole N. Murley, Acting Deputy Inspector General
Benjamin May, Counsel to the Inspector General
Kellie J. Walker, Chief of Staff, Office of Inspector General
Katherine Trimble, Assistant Inspector General for Audit
Paul H. Bergstrand, Assistant Inspector General for Special Review and Evaluation
Jason Abend, Assistant Inspector General for Investigations
Michael C. Zola, Assistant Inspector General for Congressional and Public Affairs
Tom Collick, Deputy Counsel to the Inspector General
Erin Barnes-Weaver, Deputy Assistant Inspector General for Evaluation
Sandra John, Acting Deputy Assistant Inspector General for Audit
Marcus Gullett, Acting Deputy Assistant Inspector General for Audit
James Hatfield, Special Advisor, Office of Audit, Office of Inspector General
Susan Barvenik, Associate Deputy Counsel to the Inspector General
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs
Lynn Carlson, Deputy Assistant Inspector General for Congressional and Public Affairs
Lori Hoffman, Congressional and Media Liaison, Office of Inspector General