



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

March 9, 2026

Mr. Thomas Gerstle
President and General Manager
Environmental Quality Management Inc.
1800 Carillon Boulevard
Cincinnati, OH 45240

Dear Mr. Gerstle:

The U.S. Environmental Protection Agency Office of Inspector General plans to begin an audit of selected contracts used in the 2025 Southern California wildfires cleanup. This audit is the result of internal OIG planning to help ensure effective and efficient use of federal emergency response funds. Environmental Quality Management Inc.'s EPA Contract Number 68HE0924D0002 and respective task orders used for the 2025 Southern California wildfires has been selected as one of the subject contracts for this audit. The project number for this audit is OA-FY26-0041.

Our objective is to determine whether the EPA contractors, Environmental Quality Management Inc. and Weston Solutions Inc., complied with applicable federal requirements and adhered to contract terms and conditions related to the 2025 Southern California wildfires cleanup. We plan to conduct work at your offices where government records are maintained; the EPA Region 9 headquarters office in San Francisco, California; and the areas that were affected by the 2025 wildfires in Los Angeles County, California. We will use applicable generally accepted government auditing standards to conduct our audit. The anticipated benefits of this audit include ensuring that EPA contractors that perform services during national emergencies and disasters are adhering to requirements outlined in the Federal Acquisition Regulation and the EPA Acquisition Regulation as well as applicable contract terms and conditions so that federal funds are appropriately spent and work is completed as agreed to.

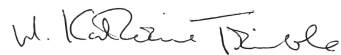
We will contact you to arrange a mutually agreeable time to discuss our objective. At that time, we can discuss any concerns that you may have and answer any questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please be ready to provide the requested items listed in the appendix to this memorandum as soon as possible but no later than March 20, 2026.

We respectfully note that the Inspector General Act of 1978, as amended, 5 U.S.C. § 404(a)(1), authorizes the OIG “to conduct, supervise, and coordinate audits and investigations relating to the programs and operations” of the EPA. In addition, Environmental Quality Management Inc. is the recipient of federal award funds, and 2 C.F.R. § 200.337(a) provides that “Inspectors General ... must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal Award, in order to make audits, examinations, excerpts, and transcripts.” This right “also includes timely and reasonable access to the non-Federal entity’s personnel for the purpose of interview and discussion related to such documents.”

We have sent a similar notification to Paige Hanson, the EPA’s chief financial officer and chief administrative officer, and Mike Martucci, acting regional administrator for EPA Region 9. 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 OIG.Hotline@epa.gov or 888-546-8740 or via our [online form](#).

Sincerely,



Katherine Trimble, Assistant Inspector General
Office of Audit

cc: Nicole N. Murley, Deputy Inspector General performing the duties of the Inspector General
Erica Kavanagh, Associate Deputy Inspector General

Appendix A – Requested Items

For the subject contract and respective tasks orders used for the 2025 Southern California wildfires, please provide the following:

- Any investigative or legal proceedings initiated or in-process that are significant to the audit objective.
- Any previous engagements and studies, applicable to the objective, including the status of any resultant recommendations of those engagements/studies.
- Copies of all contract file documents, including scope of work, deliverables, performance standards, and any and all amendments and/or modifications to the contracts.
- All documentation of established performance metrics and/or deliverables and related criteria.
- All performance/deliverables reports, including any self-assessments or internal audits conducted by Environmental Quality Management Inc.
- Copies of all other reports specified in the terms and conditions of the contract, including, but not limited to: monthly progress reports, weekly cost summary reports, readiness plans, communication plans, transportation plans, data management plans, annual incident command systems training reports, annual contractors ER equipment reports, subcontracting reports, annual allocation of non-site cost reports, and environmental preferred practices.
- All correspondence between Environmental Quality Management Inc. and the EPA, including but not limited to emails, biweekly meeting notes, and records of any meetings, including agendas and meeting minutes.
- Documentation of any incidents, failures, or compliance issues.
- A listing of all Environmental Quality Management Inc. employees who charged time to the subject contract and their corresponding labor categories and labor rates.
- A listing and copies of all subcontractor agreements.
- Support for the general and administrative rate used in the subject contract.
- Copy of Environmental Quality Management Inc.'s policies and procedures for purging its indirect expense pools for unallowable expenses per FAR Part 31.
- Environmental Quality Management Inc.'s audited financial statements for fiscal years 2024 and 2025.
- Copies of the two most recent General Services Administration contract assist visit, or CAV, reports, if applicable.