

Semiannual Report to Congress: April 1, 2025–September 30, 2025

Published November 2025

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EPA Publication No. 350-R-25-002



Index of Inspector General Act Semiannual Reporting Requirements

Requirement	Subject	Addressed in
Section 5(a)(1)	Description of significant problems, abuses, and deficiencies relating to programs and operations and associated reports and recommendations for corrective action	Section 2.1
Section 5(a)(2)	Identification of each recommendation made before the reporting period for which corrective action has not been completed and potential cost savings associated with the recommendation	Section 1.3 and Appendix 3
Section 5(a)(3)	Summary of significant investigations closed during the reporting period	Section 2.2
Section 5(a)(4)	Identification of the total number of convictions during the reporting period resulting from investigations	Section 3.1
Section 5(a)(5)	A list identifying each audit, inspection, or evaluation report issued during the reporting period, along with the total value of questioned costs (to include unsupported costs); total value of recommendations regarding funds to be put to better use; and whether a management decision had been made by the end of the reporting period	Appendix 1
Section 5(a)(6)	Information regarding any management decision made during the reporting period with respect to an audit, inspection, or evaluation report issued during a previous reporting period	Appendix 2
Section 5(a)(7)	Information described under section 804(b) of the Federal Financial Management Improvement Act of 1996	Section 1.3
Section 5(a)(8–10)	Information with respect to peer reviews conducted	Appendix 5
Section 5(a)(11–12)	Statistics on investigative reports, referrals, prosecutions, and indictments	Section 3.1
Section 5(a)(13)	Information with respect to substantiated investigations involving senior government employees	Section 2.2 and Appendix 4
Section 5(a)(14)	Information with respect to instances of whistleblower retaliation	Section 2.3
Section 5(a)(15)	Detailed description of any establishment attempts to interfere with OIG independence; summary of each report made to the agency head under Inspector General Act section 6(c)(2)	Section 2.3
Section 5(a)(16)	Detailed description of closed audits, inspections, and evaluations, as well as of closed investigations involving senior employees, not disclosed to the public	Section 2.1 and Appendix 4

Source: Inspector General Act of 1978, as amended.

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
Pub. L.	Public Law
U.S.C.	United States Code

Cover Image

From top to bottom: Image of a special agent in uniform during an arrest and a search of premises, representing our Office of Investigations' efforts to prevent and detect fraud; image of the EPA responding to the Los Angeles wildfires, representing our oversight of the EPA's response to environmental and natural disasters; and an image of air quality monitors at an air quality monitoring station in Washington Park, Indianapolis, representing our work to address issues that affect public health. (U.S. Department of Homeland Security Homeland Security Investigations image, EPA image, and EPA OIG image)

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
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

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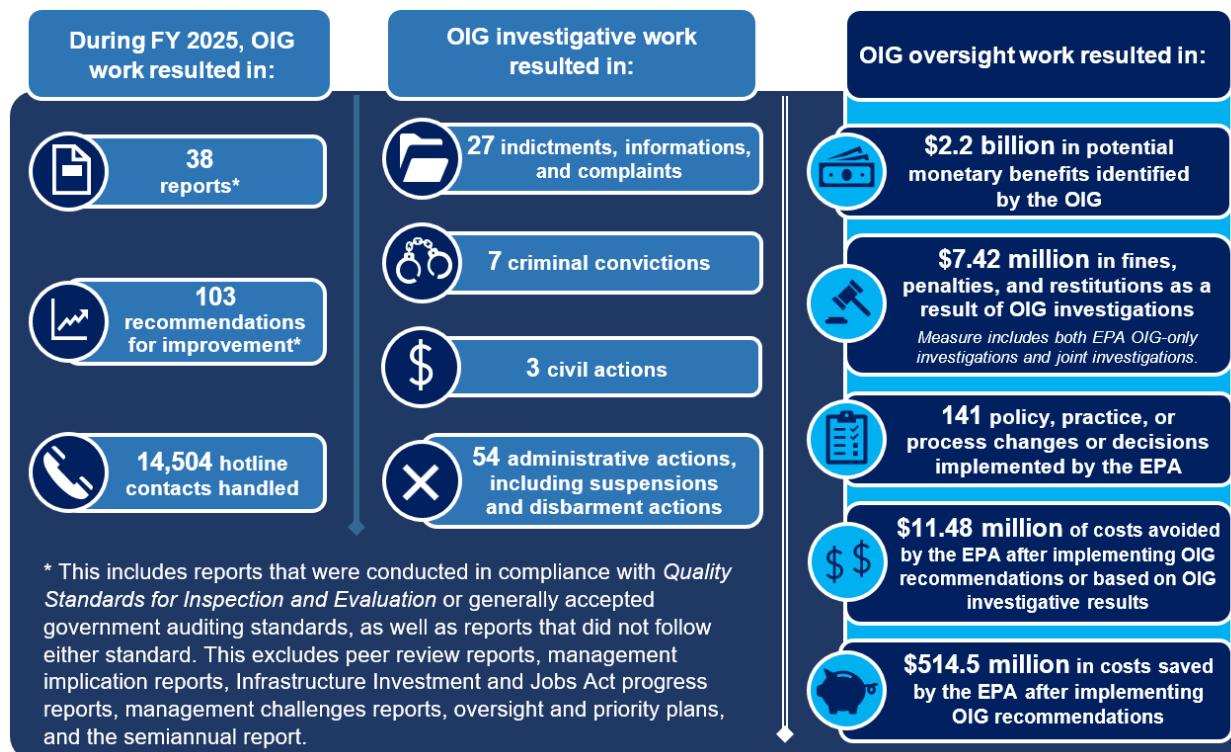
Message to Congress

I am pleased to present the U.S. Environmental Protection Agency Office of Inspector General's *Semiannual Report to Congress*. This report summarizes our work and accomplishments from April 1 through September 30, 2025, as well as our key achievements from fiscal year 2025. Throughout this year, we provided independent, objective oversight to prevent and detect fraud, waste, and abuse and to promote efficiency and effectiveness in the programs and operations of the EPA and the U.S. Chemical Safety and Hazard Investigation Board. In doing so, we delivered a strong return on investment for this fiscal year, identifying \$28 in potential monetary impact for every \$1 that Congress provided to us.



Nicole N. Murley

Improving Efficiency and Effectiveness. While the graphic below highlights key stats that demonstrate the significant value of our oversight work, some impacts cannot be easily measured. Our independent audits and evaluations provide evidence-based insights and recommendations for corrective action that foster enduring improvements. Each recommendation—whether it aims to improve program oversight and grants management or to bolster cybersecurity and emergency preparedness—translates into a stronger, more effective, more efficient EPA and more reliable results for the American people. When we identify issues, we work with the Agency to identify agreed-upon corrective actions, and we persistently follow up to ensure effective implementation.



To provide the Agency and Congress visibility into and accountability for the progress of corrective actions, we issue an annual compendium that lists open recommendations. In September, we issued our fiscal year 2025 compendium, which outlined recommendations that remained open as of May 31, 2025. The compendium emphasized 13 high-priority recommendations that, if implemented, could yield a total potential monetary benefit of nearly \$865.8 million, improve the Agency's ability to manage operations and programs, or substantially enhance program efficiency and effectiveness.

Addressing Public Health Issues. Several of our reports this semiannual period offered crucial insights that could enhance the EPA's ability to protect human health and the environment more effectively. For example, one evaluation revealed that the EPA was not verifying whether state lead-based paint programs remain adequately protective or adequately enforced, heightening the risk of children experiencing adverse and irreversible health effects from lead exposure. In response to our recommendations, the Agency is taking steps to address these shortfalls and improve program management. In another evaluation, we examined the EPA's oversight of state and local ambient air monitoring operating schedules and found that pollution levels increase when certain air quality monitoring sites are offline. This poses a risk of underreported air pollution and unreliable air quality data, potentially obscuring exposure to harmful, hidden pollution levels. To tackle these challenges, the Agency agreed to implement our recommendations, which will ultimately strengthen the Agency's oversight and improve the reliability of air quality monitoring, protecting millions of Americans who depend on accurate, timely data.

Responding to Environmental and Natural Disasters. At a time when disasters impacting the environment and public health are becoming more frequent and costly, we provided targeted oversight to help the Agency enhance its preparedness for such events. One report that we issued this semiannual period offered valuable lessons from previous oversight of the EPA's natural disaster response efforts, advising the Agency on how to better prepare for and respond to future natural disasters. We highlighted critical areas for improvement, such as data collection, risk communication to the public, and resilience of contaminated sites and infrastructure. Similarly, we issued an evaluation alerting the Agency that nearly one-third of the 157 federal facility Superfund sites on the National Priorities List are potentially at risk from sea-level rise and increased storm surge, threatening the effectiveness of the cleanup remedies at those locations. An audit report identified necessary improvements that the EPA National Center for Radiation Field Operations should take to boost its preparedness for radiological emergencies. As a result of these findings, the Agency agreed to begin assessing the most effective use of the center and, based on the results, to develop a strategy to improve the center's readiness.

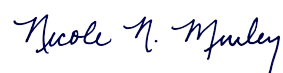
Preventing and Detecting Fraud. In our ongoing commitment to safeguarding taxpayer dollars and ensuring the responsible use of EPA resources, we have continued our robust fraud-fighting efforts. This semiannual period, our investigative work led to ten criminal charges; helped secure four criminal convictions related to fraud in EPA operations; and resulted in over \$7 million in fines, civil recoveries, penalties, and restitutions. Additionally, we focused on preventive measures to enhance the security of EPA operations and reduce vulnerabilities to fraud or compromised scientific integrity. One of our reports highlighted issues stemming from inadequate oversight of the EPA's manuscript publishing process and lab access, which allowed an EPA researcher to ignore peer review concerns, include the researcher's underage child as a coauthor on a manuscript after it had been cleared, and bring unauthorized guests

into an EPA lab. Other reports identified limitations in the EPA's ability to detect fraudulent submissions among extramural research reports sent in by email and the undetected installation of unauthorized software on EPA computers and networks. Furthermore, we continued our proactive outreach to EPA staff and other stakeholders involved in managing, receiving, or overseeing EPA funds. These efforts aimed to raise awareness of fraud prevention and mitigation strategies and to promote the OIG Hotline as a resource for reporting suspected wrongdoing or mismanagement. During this reporting period, we delivered 32 fraud awareness briefings to more than 1,315 stakeholders nationwide.

Providing Oversight of Supplemental Funding. We continue to provide independent oversight of the EPA's management of over \$60 billion in funding appropriated through the Infrastructure Investment and Jobs Act. Our work assists the Agency in ensuring that this funding is used effectively, delivers measurable benefits, and reaches the communities it is intended to serve. For instance, we conducted an audit that identified nearly \$218.2 million in Infrastructure Investment and Jobs Act funding for tribal set-asides meant for the drinking and clean water programs that had either not been awarded or were not awarded in a timely manner. As a result, the EPA is revising its guidance to facilitate more timely allocation of funds to regional offices and to prioritize projects based on the most significant health risks. Additionally, in an audit follow-up report, we informed the Agency of unexplained changes to grant information in its grants management system. We expressed our concern that such changes can compromise the integrity of the information in the system and hamper the EPA's ability to administer and oversee its grants portfolio, which had a value of more than \$70 billion in the fall of 2024.

Supporting and Protecting Whistleblowers. Whistleblowers play a crucial role in uncovering fraud, waste, and abuse, and we are committed to our statutory duty to investigate allegations of reprisal against employees of the EPA and CSB, as well as reprisals against contractors, subcontractors, grantees, subgrantees, and personal services contractors. For example, we issued an investigative report revealing that a former employee of an EPA grantee faced retaliation after making several disclosures regarding potential grant fraud and gross mismanagement of an EPA grant or subgrant. These protected disclosures were contributing factors in the employee's termination. We recommended that the EPA administrator consider appropriate corrective actions based on these findings. Additionally, we continued our essential education and outreach efforts by hosting our fifth annual Whistleblower Appreciation Presentation. Hundreds of employees from the EPA and CSB attended this event, which underscored the importance of whistleblowers and their contributions to maintaining an honest, efficient, and accountable government.

Looking Ahead. In fiscal year 2026, we will continue to deliver objective oversight that offers timely and relevant insights, providing the Agency, Congress, and the public with a clear understanding of the challenges that the EPA and the CSB face in their programs and operations, along with solutions to address them. The accomplishments summarized in this semiannual report are a testament to the unwavering commitment and collaborative efforts of our staff. I am proud of their dedication, integrity, and impactful work.



Nicole N. Murley
Acting Inspector General

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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. According to the EPA website, to carry out its mission, the Agency develops and enforces regulations, provides grants, researches environmental issues, sponsors partnerships, educates people about the environment, and publishes information about its activities.

The U.S. Chemical Safety and Hazard Investigation Board

The U.S. Chemical Safety and Hazard Investigation Board is an independent federal agency that investigates chemical incidents to determine the cause or probable cause. According to the CSB website, the agency's mission is "to drive chemical safety excellence through independent investigations to protect communities, workers, and the environment."

The EPA Office of Inspector General

The EPA Office of Inspector General's mission is to prevent and detect waste, fraud, and abuse and to promote economy, efficiency, and effectiveness in Agency programs and operations. Our office was created pursuant to the Inspector General Act of 1978, as amended, 5 U.S.C. §§ 401–424. Since 2004, Congress has designated the EPA inspector general to also serve as the CSB inspector general. As such, in accordance with the Inspector General Act, we keep the EPA, CSB, and Congress "fully and currently informed about problems and deficiencies relating to the administration" of EPA and CSB programs and operations, as well as about "the necessity for and progress of corrective action."

Our Vision

Engaged oversight professionals inspiring innovation.

Our Mission

To drive change by fighting fraud, promoting ethical conduct, and recommending improvement in the environmental space.






Our Goals

1. Be an employer of choice within the oversight community.
2. Improve the effectiveness and efficiency of our oversight and business processes.
3. Deliver high-impact oversight results.

Our People

Our staff consists of auditors, program analysts, investigators, social scientists, and other professionals. With strategic locations throughout the United States, we can quickly begin oversight in response to environmental emergencies and can ensure continuity of operations.

1.2 OIG Strategic Planning

The OIG’s strategic planning documents guide us as we design and execute audits, evaluations, inspections, and investigations. When determining which audits, evaluations, inspections, and investigations to undertake, we consider how our oversight work supports the EPA’s and the CSB’s mission-related efforts. Some of our work is required by law, some is discretionary, and some follows up on the corrective actions that the EPA and CSB have implemented to verify their responsiveness to prior OIG recommendations. In this semiannual report, we identify what aspect of the Agency’s mission each report addresses (); whether the work was statutorily mandated (); and whether we provide supplemental materials for each report, such as a podcast (), StoryMap (), or video (.

The OIG’s Fiscal Year 2024–2028 Strategic Plan

Report No. 24-N-0059 | Updated February 21, 2025

Our *EPA OIG Strategic Plan 2024–2028* documents our five-year vision and our mission, along with three strategic goals and related objectives that focus on (1) our people, (2) our processes, and (3) our products. Developed with input from our component offices, this strategic plan outlines a unified direction for our office and clear expectations for success as we work toward our strategic goals of delivering impactful oversight results, improving our effectiveness and efficiency, and becoming an employer of choice.

Infrastructure Investment and Jobs Act Oversight Plan—Year Four

Report No. 25-N-0039 | Issued June 25, 2025 | 

The Infrastructure Investment and Jobs Act, or IIJA, Pub. L. No. 117-58 (2021), provides the EPA with over \$60 billion for infrastructure-related purposes, including state and tribal assistance grants targeting clean water initiatives, Superfund, geographic programs, and more. We have received IIJA funds that will allow us to perform dedicated oversight of the EPA’s execution of IIJA programming for ten years or longer if needed. Our *Infrastructure Investment and Jobs Act Oversight Plan—Year Four* built on our first three years of IIJA oversight plans, and it guides our audits, evaluations, and oversight engagements so that we provide effective oversight of EPA programs receiving or impacted by IIJA funds. Each year, we also produce an IIJA progress report that highlights our efforts to implement our IIJA oversight plan.

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 administrative and business operations issues. 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.** Recommendations that the responsible office disagrees with; has not provided a formal, complete, written response to; or has proposed corrective actions for which it and the OIG have not agreed upon.
- **Resolved.** Recommendations that the responsible office and the OIG agree on but for which the agreed-to corrective actions have not been completed. This includes those with corrective actions past due or due in the future. A recommendation can have one or more corrective actions that the responsible office has agreed to complete. For the purposes of this semiannual report, we refer to these resolved recommendations as unimplemented. [Appendix 3](#) lists the unimplemented recommendations issued prior to this semiannual reporting period.
- **Completed.** The responsible office and the OIG agree upon the recommendation and proposed corrective actions, and the responsible office has fully completed them. These recommendations are also called closed recommendations, whereas unresolved and resolved recommendations are referred to as open recommendations.

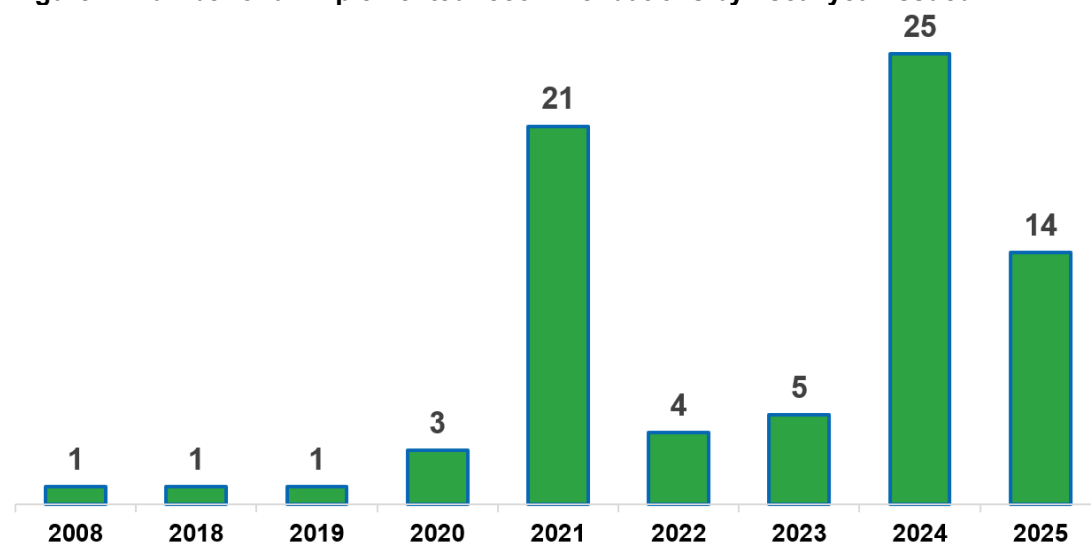
This semiannual period, we issued a [compendium](#) that provides an in-depth analysis of all open recommendations that the OIG issued to the EPA. The compendium also highlights 13 high-priority recommendations with potential monetary benefits of nearly \$865.8 million. High-priority recommendations include those that, if implemented, could significantly impact EPA program efficiency and effectiveness, improve the Agency's ability to manage operations and programs, or result in significant potential monetary benefits.

Section 5(a)(2) of the Inspector General Act, 5 U.S.C. § 405, as amended by the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, requires that we identify each recommendation described in previous semiannual reports for which corrective action has not been completed, including the potential cost savings associated with the recommendation.¹ We define potential cost savings as the total of questioned costs plus funds to be put to better use. For this semiannual report, we analyzed

¹ Effective December 27, 2022, the Inspector General Act of 1978 was reorganized and codified as 5 U.S.C. §§ 401–424; the requirements for the semiannual report to Congress appear in 5 U.S.C. § 405. Section 5273 of the National Defense Authorization Act for Fiscal Year 2023, however, amended the semiannual reporting requirements as they had appeared in section 5 of the Inspector General Act prior to the codification. These revisions are not yet codified in 5 U.S.C. § 405 and instead appear in the statutory notes as amendments not shown in the text. Accordingly, citations to particular semiannual reporting requirements will reflect the specific subsection of section 5 of the Inspector General Act and a general parallel citation to 5 U.S.C. § 405.

actions that the EPA and CSB took regarding recommendations described in past reports, and we identified the recommendations that remained unimplemented as of September 30, 2025: 75 for the EPA and zero for the CSB. Figure 1 shows when these unimplemented recommendations were originally issued to the EPA. As shown in Table 1, the potential cost savings of the 75 recommendations issued to the EPA that remain unimplemented are over \$53.5 million.

Figure 1: Number of unimplemented recommendations by fiscal year issued



Source: OIG analysis of OIG reports issued before the current reporting period. (EPA OIG image)

Table 1: EPA and CSB unimplemented recommendations

Agency	Number of unimplemented recommendations	Potential cost savings associated with unimplemented recommendations (\$)
EPA	75	53,567,000.00
CSB	0	0.00
Total	75	53,567,000.00

Source: OIG analysis of OIG final reports, EPA response memorandums, inspector general responses, and the EPA's Enterprise Audit Management System. (EPA OIG table)

Table 2 breaks down the 75 unimplemented recommendations that we issued to the EPA based on whether they will help the Agency become more effective and efficient in producing health and environmental outcomes or whether they aim to optimize the efficiency and effectiveness of the Agency's administrative and business operations processes. [Appendix 3](#) includes the full text of the unimplemented recommendations, including the potential cost savings for each recommendation.

Table 2: EPA unimplemented recommendations

Category	Number of unimplemented recommendations	Potential cost savings associated with unimplemented recommendations (\$)
Administrative and Business Operations	14	129,000.00

Category	Number of unimplemented recommendations	Potential cost savings associated with unimplemented recommendations (\$)
Human Health and Environmental Issues	61	53,438,000.00
Total	75	53,567,000.00

Source: OIG analysis of OIG final reports, EPA response memorandums, inspector general responses, and the EPA's Enterprise Audit Management System. (EPA OIG table)

Section 5(a)(7) of the Inspector General Act, 5 U.S.C. § 405, requires that we provide information described under section 804(b) of the Federal Financial Management Improvement Act of 1996. In our audit of the Agency's FYs 2024 and 2023 (Restated) Consolidated Financial Statements, we determined that the "results of our tests did not disclose any instances of noncompliance with [Federal Financial Management Improvement Act] requirements, including where the Agency's financial management systems did not substantially comply with the applicable federal accounting standard." Similarly, the audit of the 2024 and 2023 CSB financial statements were prepared in accordance with generally accepted accounting principles. Accordingly, there is no information or outstanding corrective actions to report with respect to the Federal Financial Management Improvement Act of 1996.

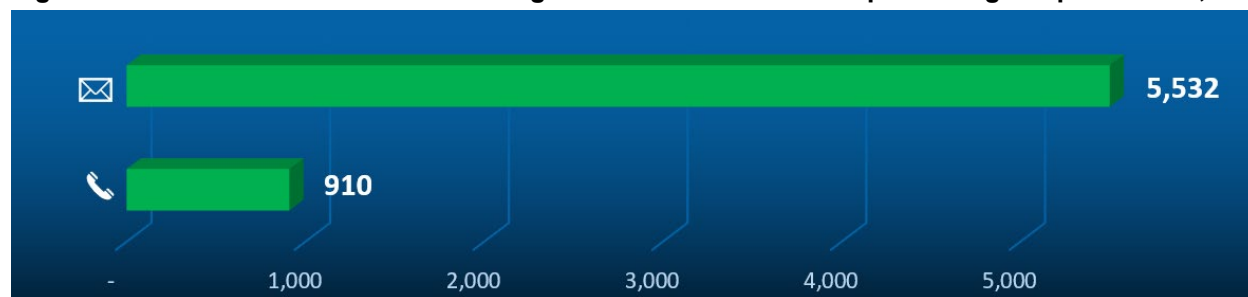
1.4 The OIG Hotline

The Inspector General Act, 5 U.S.C. § 420, 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, including whistleblower disclosures, 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. We also encourage people to use the hotline to submit suggestions for assessing the efficiency and effectiveness of Agency programs. Anyone may submit complaints and suggestions, including EPA and CSB employees, participants in EPA and CSB programs, Congress, organizations, and the public. As a result of these contacts, we may conduct audits, evaluations, inspections, and investigations.

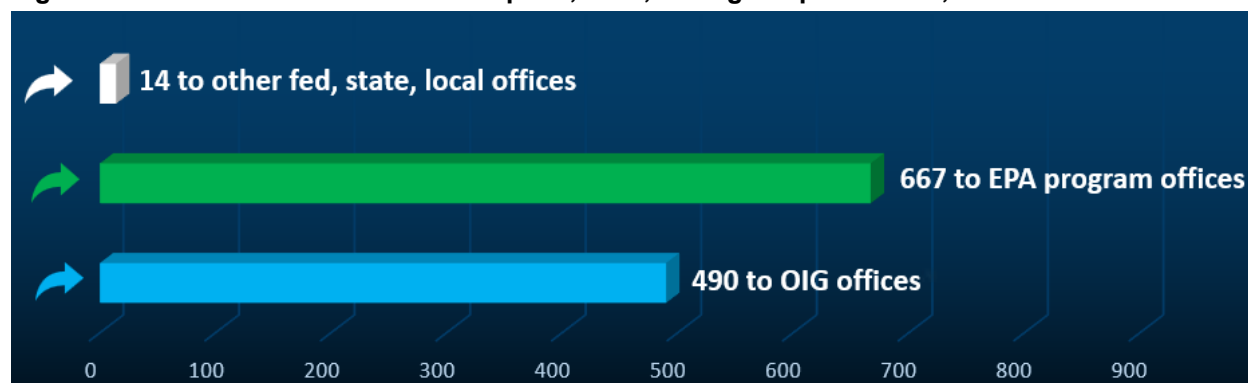
Hotline Statistics

Figures 2 through 5 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 this semiannual period and this fiscal year. In this semiannual period, we made 1,171 referrals from the 6,442 contacts we received. And this fiscal year, we made 1,769 referrals from the 14,504 contacts we received. A contact can be referred to more than one entity. We refer contacts related to an Agency program or operation but unrelated to potential fraud, waste, abuse, misconduct, or mismanagement to the appropriate EPA or CSB office. As applicable, we attempt to refer contacts unrelated to the EPA or the CSB to the appropriate government agency.

Figure 2: Hotline contacts received through emails and calls from April through September 30, 2025

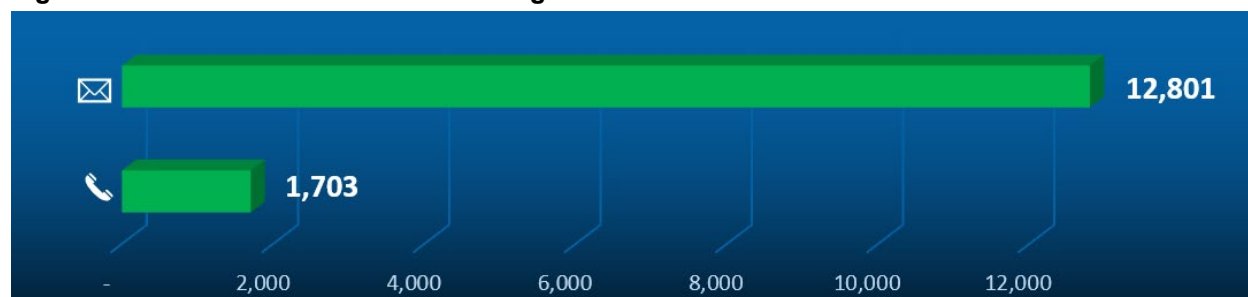


Source: OIG Hotline data. (EPA OIG image)

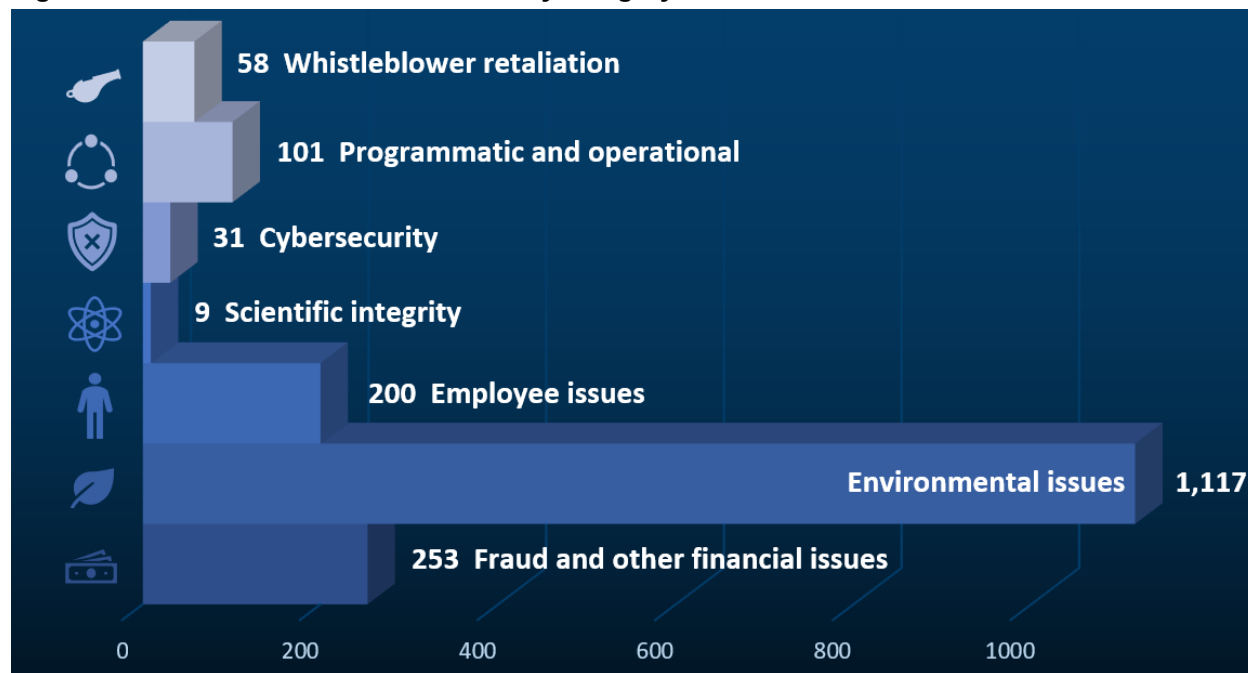
Figure 3: Hotline referrals made from April 1, 2025, through September 30, 2025

Source: OIG Hotline data. (EPA OIG image)

Note: These numbers show the total referrals. These numbers should not be used to make claims about total number of matters referred, as matters can be referred to multiple offices.

Figure 4: Hotline contacts received through emails and calls in FY 2025

Source: OIG Hotline data. (EPA OIG image)

Figure 5: Hotline referrals to OIG offices by category for FY 2025

Source: OIG Hotline data. (EPA OIG image)

Hotline Confidentiality

Individuals who contact the hotline are not required to identify themselves and may request anonymity or confidentiality when submitting allegations. However, we encourage those who report allegations to identify themselves so that they can be contacted if we have additional questions. Pursuant to the Inspector General Act, 5 U.S.C. § 407, we will not disclose the identity of an EPA or CSB employee who provides a complaint or certain information to our office, including whistleblower disclosures, unless that employee consents or the inspector general determines that such disclosure is unavoidable during an investigation. As a matter of policy, we will provide comparable protection to employees of contractors, grantees, and others who make a complaint or provide information to the OIG and request confidentiality. Also pursuant to the Inspector General Act, 5 U.S.C. § 420, we will not disclose the identity of an individual who provides information via our online complaint form unless the individual consents or the inspector general determines that such disclosure is unavoidable during an investigation. This protection applies to anyone submitting information via the online complaint form, 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.

To report potential fraud, waste, abuse, misconduct, or mismanagement, contact the OIG Hotline:

Online

Hotline Complaint [Form](#)

Email

OIG.Hotline@epa.gov

Phone

(888) 546-8740

Mail

Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, NW
Mail Code: 2410T
Washington, D.C. 20460



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.

The EPA’s 2012 *Scientific Integrity 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 any 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

The OIG has a critical role in protecting the Agency’s adherence to scientific integrity. As an independent office, we can receive complaints of mismanagement, misconduct, abuse of authority, or censorship, including those related to “scientific misconduct” or “research misconduct.” Such misconduct includes fabrication, falsification, or plagiarism in proposing, performing, or reviewing research or reporting research results. Through our statutory mandate, we can investigate these allegations. Also, we may refer scientific integrity allegations that we receive to the Scientific Integrity Program. Scientific Integrity Program staff and OIG staff meet every three weeks to discuss the status of cases, as appropriate, as well as other scientific integrity-related issues.

To facilitate transparency, we continue our practice, started in our *Semiannual Report to Congress* in the fall of 2020, of providing a summary of our scientific integrity oversight at the Agency.

Scientific Misconduct Allegations Received and Investigated by the OIG

At the beginning of the semiannual period, we had 12 open cases involving potential scientific misconduct. We received three complaints with allegations involving potential scientific misconduct from Agency employees and other sources during this semiannual period and opened one new investigation. As of September 30, 2025, two investigations were closed. In Report No. 25-N-0021, which we summarize in section 2.2 of this report, we detailed scientific integrity and ethics concerns involving the EPA Office of Research and Development and offered related measures for improvement.

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 that "[e]ach 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, which specify how the OIG and the Agency will work together to share information and investigate research misconduct, state that upon receiving a research misconduct allegation, the scientific integrity official will refer the allegation to the OIG Hotline. Likewise, if we receive an allegation of research misconduct, we 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 three weeks to discuss the status of cases, as appropriate, as well as other scientific integrity-related issues.

In FY 2022, we 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 years of negotiation, we have several concerns with changes the Agency proposed to the OIG's revised coordination procedures that have yet to be resolved. In January 2025, we met with Office of Research and Development leaders to discuss our concerns. Further discussion on coordination procedures have been on hold pending the Agency's comprehensive restructuring effort. Revised coordination procedures are essential to clarify our access rights and to ensure that scientific integrity concerns, as well as allegations of other wrongdoing, are routed to the proper office and addressed in the most efficient and effective manner.

At the beginning of FY 2023, we began issuing monthly information requests to the Agency's Scientific Integrity Program to ensure that we are receiving all relevant information on potential scientific integrity concerns. In January 2024, the Agency agreed to provide this information to us without the need for a formal information request for a period of six months while the OIG and the Agency work to finalize the revised coordination procedures. As of the end of the reporting period, the Agency has continued to provide this information monthly.

Section 2: **Work Accomplished During the** **Semiannual Period**



2.1 Oversight Work

Summaries of the reports that we issued during the semiannual period, along with the associated recommendations, are detailed below. Section 5(a)(1) of the Inspector General Act, 5 U.S.C. § 405, requires “a description of significant problems, abuses, and deficiencies relating to the administration of programs and operations of the establishment” as well as the related reports and recommendations for corrective action. Section 5(a)(16)(A) of the Act requires that we provide a detailed description of closed audits, inspections, and evaluations not previously disclosed to the public; we do not have any such instances to report.

Congressional Requests

Each time the OIG receives a request from Congress to undertake discretionary work, we must consider whether we have the capacity to conduct the work in a timely fashion and whether the work would prevent us from 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. This semiannual period, we published two reports based on congressional requests.

Audit of the EPA’s Telework and Remote Work Program Locality Pay

Report No. 25-P-0031 | Issued May 21, 2025

The EPA cannot ensure that employees working in a telework or remote work status are paid the correct locality pay because it does not have comprehensive or reliable data to verify employees’ worksite locations. Without a mechanism to verify employees’ worksite locations against their locality pay, the Agency remains at risk of overpaying or underpaying employees.



The U.S. map depicts telework and remote worksite locations and the locality pay element plotted in each regional city. (EPA OIG image)

Recommendation issued to the assistant administrator for Mission Support and the chief financial officer

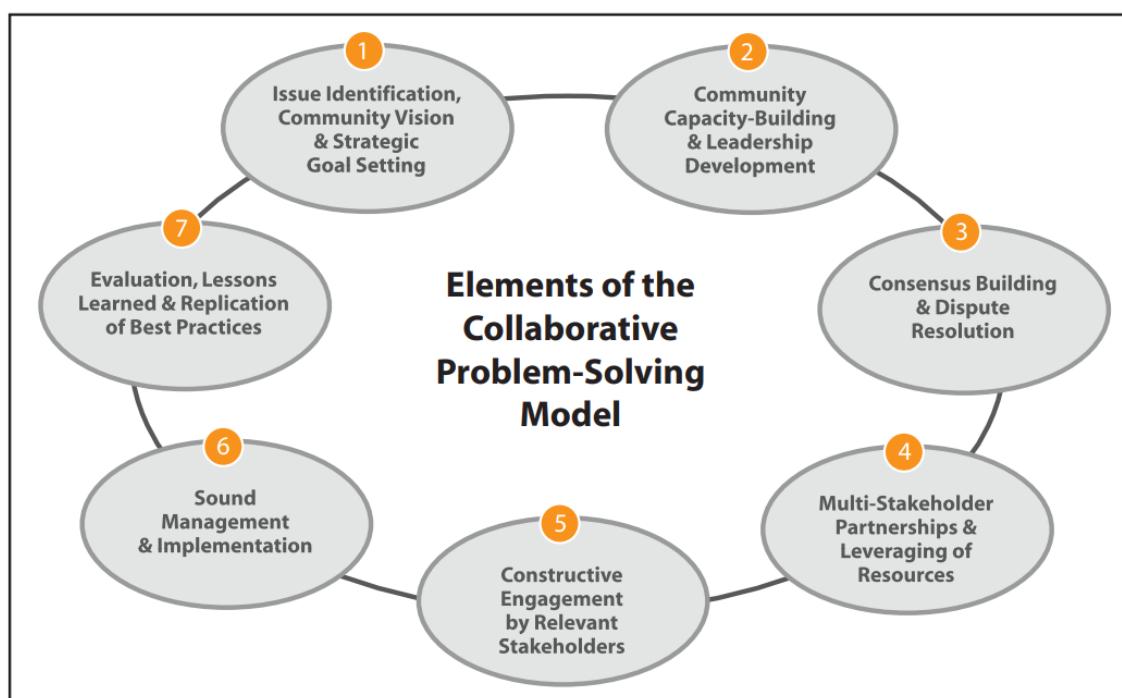
No.	Recommendation
1	Collaborate to develop a plan to annually verify whether Agency employees are working in locations that are in accordance with their assigned locality pay.

Audit of the EPA's Fiscal Year 2021 Environmental Justice Collaborative Problem-Solving Cooperative Agreements

Report No. 25-P-0046 | Issued August 6, 2025

We were unable to determine whether FY 2021 Environmental Justice Collaborative Problem-Solving cooperative agreements fully achieved the project objectives described in work plans, as well as whether the EPA's monitoring of these projects ensured that the funding was being used as intended. Work plans did not consistently contain well-defined measurable outputs and expected outcomes, performance reports lacked details to fully measure progress, and not all project officers documented their review of recipients' performance reports. Without measurable objectives, the EPA cannot assess project success or ensure that the expended amount of almost \$1.1 million of cooperative agreement funds that we reviewed was used as intended. We did not issue any recommendations in this report but requested that the EPA notify us if it takes any corrective actions based on our findings.

The EPA's Environmental Justice Collaborative Problem-Solving Model



Source: The EPA's Environmental Justice Collaborative Problem-Solving Model [guide](#). (EPA OIG modification of image from the EPA's Environmental Justice Collaborative Problem-Solving Model)

Infrastructure Investment and Jobs Act

The IIJA was signed into law on November 15, 2021. Overall, the IIJA appropriates approximately \$60 billion to the EPA for FY 2022 through 2026, most of which is available until expended. The IIJA also provides for OIG oversight of these funds. To keep the public apprised of our IIJA oversight work, we maintain a web [page](#), “EPA OIG Infrastructure Investment and Jobs Act Oversight.” The web page features our EPA IIJA spending dashboard, links to our *IIJA Oversight Plans* and *IIJA Progress Reports*, and lists our ongoing and completed infrastructure oversight work.

IIJA Investigative Work

Table 3 highlights the IIJA investigative work that we undertook this semiannual reporting period.

Table 3: IIJA-related investigative activity

Investigative activity	Number of cases
Cases open as of April 1, 2025	5
Cases opened during period	3
Cases closed during period	0
Cases open as of September 30, 2025	8

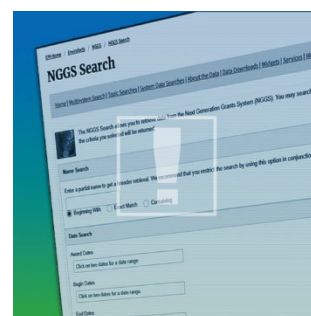
Source: OIG investigations. (EPA OIG table)

IIJA Audit and Evaluation Work

Audit Follow-Up: Changes to Grant Information in the EPA's Grants Management System

Report No. 25-N-0029 | Issued May 7, 2025


A prior audit of the EPA's reporting of IIJA obligations and outlays identified grant information that was inexplicably changed in the EPA's grants management system, the Next Generation Grants System, raising concerns about the overall integrity of the system. During this follow-up audit, we could not determine a valid reason for the changes. EPA grant staff were also not able to explain why the changes were made. The system did not have adequate controls, such as requiring justifications or approval for changes, to prevent or detect improper changes to grant information. If the EPA cannot rely on the information in this system, its ability to effectively administer and oversee its grants portfolio is hampered. Furthermore, inadequate controls within the system increase the EPA's susceptibility to fraud. Improper changes could also impact connected EPA systems. We did not issue any formal recommendations in this report.



A web page that allows the public to search data within the EPA's Next Generation Grants System. (EPA OIG image)

Audit of the EPA's Oversight of State Subrecipient Monitoring in the Clean Water State Revolving Fund Program

Report No. 25-P-0030 | Issued May 13, 2025

 Ensuring clean and safe water.


There are opportunities for the EPA to improve its oversight practices in the annual review steps devoted to state subrecipient monitoring in the Clean Water State Revolving Fund Program, including the monitoring of subrecipients of IJA funds. The EPA provided program guidance that supported the three states we reviewed. The Agency could further support states in their subrecipient monitoring activities by providing best practices guides for subrecipient monitoring and helping subrecipients who receive federal funds comply with the Clean Water Act, program regulations, and Agency guidelines. Outside of our audit scope, we observed that Clean Water State Revolving Fund capitalization grant terms and conditions could include a requirement that recipients and subrecipients report violations of federal criminal law involving fraud, bribery, or gratuity violations to the OIG. Also, the EPA could encourage states to include a similar provision in their Clean Water State Revolving Fund loan agreements.

Recommendations issued to the assistant administrator for Water

No.	Recommendation
1	Update the EPA's Clean Water State Revolving Fund annual review procedures and associated guidance to add a review of state oversight practices and establish minimum standards for what practices could constitute compliance specific for the civil rights requirements.
2	Determine whether steps can be implemented to incorporate confirmation of the System for Award Management website for excluded entities into either the EPA's annual review process or the state capitalization agreements, or both, to help ensure that suspended and debarred entities, including contractors and subcontractors, are not receiving Clean Water State Revolving Fund Program funding.
3	Implement the Office of Water's plan to search the Federal Audit Clearinghouse annually to ensure that all Clean Water State Revolving Fund-related findings in subrecipients' single audit reports are known to the EPA and that states are monitoring subrecipients to ensure that appropriate corrective action has been taken with respect to audit findings.
4	Create and maintain an online guide that describes best practices for states to perform subrecipient monitoring of their Clean Water State Revolving Fund programs.
5	Create and maintain an online guide that describes for states best practices for compliance with federal equivalency requirements in the Clean Water State Revolving Fund Program.

Evaluation of the South Carolina Clean Water State Revolving Fund Program's Capacity to Manage Infrastructure Investment and Jobs Act Funding

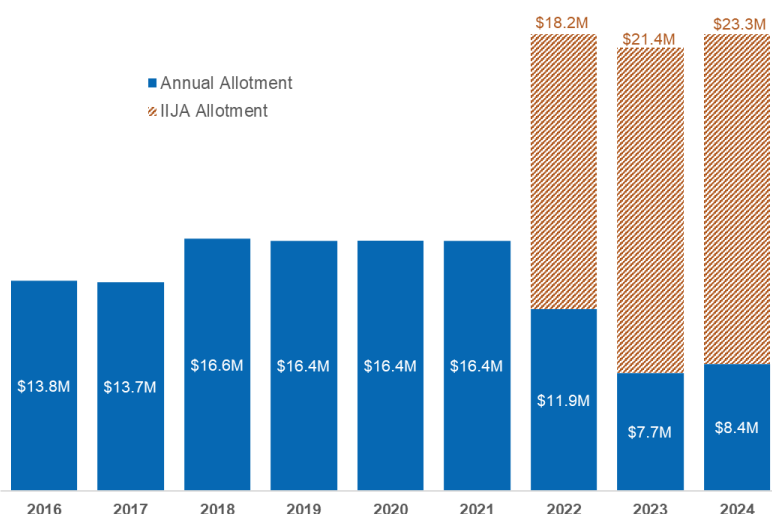
Report No. 25-E-0035 | Issued June 11, 2025

 Ensuring clean and safe water.

South Carolina has the financial resources to sustain and implement its Clean Water State Revolving Fund program, and it has made organizational changes, such as creating an outreach coordinator position, to improve its capacity to use the program's IJA funding. However, the state faces challenges related to stakeholder capacity, including the inability of some communities to participate in the program because they cannot meet the state's financial audit requirements; increased federal

requirements for infrastructure projects, such as the Build America, Buy America Act; and a lack of awareness or understanding of the program. South Carolina program staff also expressed concerns related to human capital capacity, such as staffing levels and a limited ability to learn about the federal-level program through training. As a result, South Carolina is not using its IIJA funding for the program as effectively as it could. For example, the number of Clean Water State Revolving Fund loans the state executed was 12 percent below the national average in state FYs 2021 and 2022, and at the end of state FY 2023, South Carolina had an uncommitted funds balance of \$209 million in the program. If South Carolina does not take steps to address its challenges, millions of IIJA dollars intended for water infrastructure improvements may not reach the state’s communities.

South Carolina’s Clean Water State Revolving Fund allotments, FY 2016–FY 2024



Source: OIG summary of South Carolina Clean Water State Revolving Fund annual and IIJA allotments.

(EPA OIG image)

Notes: All dollar amounts are rounded and expressed in millions. Amounts exclude funding pursuant to 33 U.S.C. § 1384(b) to conduct applicable water quality planning requirements. The IIJA allotment amounts also exclude the Clean Water State Revolving Fund funding provided specifically to address emerging contaminants.

Recommendations issued to the regional administrator for Region 4

No.	Recommendation
1	Encourage the South Carolina Clean Water State Revolving Fund program to identify potential program participants that are unable to meet financial statement audit requirements as of June 30, 2025. Doing so will enable the South Carolina Clean Water State Revolving Fund program to target those potential program participants that need technical assistance, thereby increasing overall program participation.
2	Implement a plan to assist the South Carolina’s Clean Water State Revolving Fund program in conducting outreach and providing technical assistance to the potential program participants that were identified as a result of Recommendation 1.
3	Provide technical assistance to the South Carolina Clean Water State Revolving Fund program to increase its pace rate and decrease its uncommitted funds balance.
4	Provide annual training on the Clean Water State Revolving Fund Program through fiscal year 2026 to South Carolina Clean Water State Revolving Fund program staff to enhance their knowledge of the program and requirements applicable to the use of program funding, such as the Build America, Buy America Act. Doing so will improve the South Carolina Clean Water State Revolving Fund program’s human capital capacity to implement the program effectively.

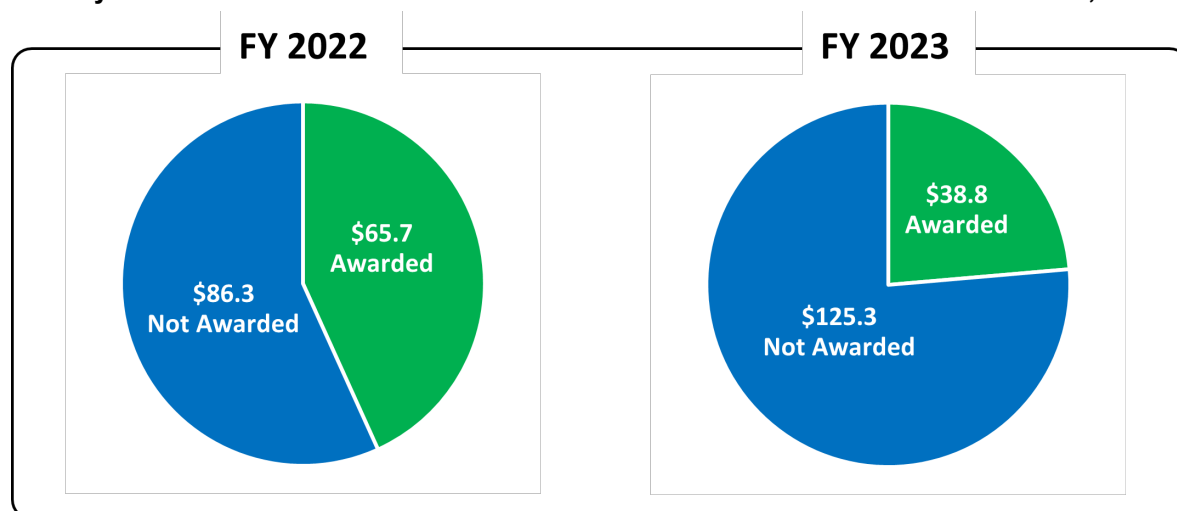
Audit of the EPA's Water Infrastructure Set-Aside Grants to Tribes

Report No. 25-P-0036 | Issued June 16, 2025

 Ensuring clean and safe water.

The EPA's IIJA funds for the Clean Water Indian Set-Aside Program and the Drinking Water Infrastructure Grants—Tribal Set-Aside Program, collectively referred to as the tribal set-aside programs, were not awarded in a timely manner. About \$86.3 million, or roughly 57 percent, of the \$152.1 million allocated in FY 2022 IIJA tribal set-aside funds were not awarded to tribes in a timely manner. At the time of our data collection, about \$125.3 million, or roughly 76 percent, of the \$164.1 million allocated in FY 2023 IIJA tribal set-aside funds had not been awarded to tribes. As of December 2023, about \$140.6 million, or roughly 93 percent, of \$152.0 million of the FYs 2022 and 2023 DWIG-TSA funds allocated for emerging contaminants and lead service line replacements had not been awarded to tribal projects. In addition, seven regional offices could not provide documentation of their pre-award decision-making processes for FY 2022 tribal set-aside program IIJA awards, as required. Further, four regional offices had not developed a quantifiable method to prioritize projects according to severity of health risks per the Drinking Water Infrastructure Grants—Tribal Set-Aside Program guide.

Fiscal year IIJA tribal set-aside funds awarded and not awarded as of December 2023, in millions



Source: OIG analysis of IIJA tribal set-aside data received from the regional offices. (EPA OIG image)

Note: FYs 2022 and 2023 Clean Water Indian Set-Aside IIJA Emerging Contaminants funds were not allocated to the EPA regional offices until FY 2024 and, as a result, are not included in the IIJA totals.


Recommendations issued to the assistant administrator for Water

No.	Recommendation
1	Develop a process to ensure that Infrastructure Investment and Jobs Act tribal set-aside program funds are allocated to the regional offices in a timely manner.
2	Determine, based on input from the regional offices, whether the February 2024 supplemental <i>Clean Water Indian Set-Aside – Emerging Contaminants Program Guidance</i> adequately clarifies how regional offices are to identify and prioritize Clean Water Indian Set-Aside Infrastructure Investment and Jobs Act Emerging Contaminants funds for eligible projects and update the guidance if needed.

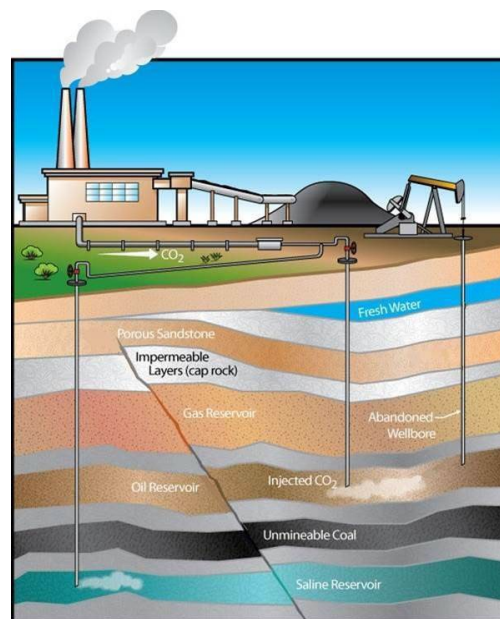
No.	Recommendation
3	Determine, based on input from the regional offices, what additional guidance is needed to clarify how to identify and prioritize Drinking Water Infrastructure Grants—Tribal Set-Aside Infrastructure Investment and Jobs Act Emerging Contaminants funds for eligible projects. Develop and distribute additional guidance as appropriate.
4	Determine, based on input from the regional offices, what additional guidance is needed to clarify how to identify and prioritize Drinking Water Infrastructure Grants—Tribal Set-Aside Infrastructure Investment and Jobs Act Lead Service Line Replacement funds for eligible projects. Develop and distribute additional guidance as appropriate.
5	Provide guidance to the regional offices regarding pre-award recordkeeping requirements for documenting the rationale and data used to determine funding decisions related to the tribal set-aside programs for all Infrastructure Investment and Jobs Act awards.
6	Take adequate steps to ensure that Regions 3, 5, 6, and 8 expeditiously establish quantifiable methods for prioritizing projects to receive Drinking Water Infrastructure Grants—Tribal Set-Aside funds.

Evaluation of the EPA's Implementation of the Underground Injection Control Class VI Well Program

Report No. 25-E-0045 | Issued July 28, 2025 | 

 Ensuring clean and safe water.

The EPA met Congress's intent to spend annual and IJIA appropriations to grow Class VI Program expertise and capacity and improve Class VI permitting, except that it did not spend \$1.2 million designated for Class VI wells training in the specified time frame. Despite the increased expertise and capacity, the EPA is still not on track to issue all final Class VI permits within its goal of 24 months, and it has not consistently determined whether permit applications were complete within 30 days of submission, as specified in 40 C.F.R. § 124.3(c). The Agency could also take steps to enhance public transparency for the Class VI permitting process. Additionally, the EPA has not demonstrated that its interagency agreements with the U.S. Department of Energy's National Laboratories to provide extramural support for the Class VI Program comply with the Federal Acquisition Regulation and EPA policy. Consequently, we consider the entire \$7,999,808 obligated for these interagency agreements to be questioned costs as they were not supported by adequate documentation. Finally, the National Laboratories have not always submitted the required monthly status reports. Permitting delays may deter the construction of Class VI wells, and a lack of transparency may prevent communities from accessing information about proposed and operational Class VI wells near them. Also, without compliant extramural support, the EPA cannot protect the millions of federal dollars spent on Class VI work from waste and abuse.



Schematic of a Class VI well.

Source: EPA Report to Congress: *Class VI Permitting*, October 2022. (EPA image)

What is a Class VI well and the EPA's Class VI Program?

An *injection well* is used to inject fluids underground into porous and permeable geologic formations. The EPA's Underground Injection Control Program categorizes injection wells into one of six classes based on the type and depth of the injection activity, as well as its potential to endanger an underground source of drinking water. A *Class VI well* stores injected carbon dioxide in deep rock formation, with the intent to permanently trap the carbon dioxide underground and reduce carbon dioxide emissions in the atmosphere. In 2010, the EPA finalized the regulations for Class VI wells and established its *Class VI Program* as part of its overall Underground Injection Control Program.

Recommendations issued to the assistant administrator for Water

No.	Recommendation
1	Assess the permitting process, including the EPA regional office resource needs and communication with permit applicants, to identify key factors contributing to delays, and establish a plan to address these key factors to achieve goals for Underground Injection Control Class VI permit review timelines. Doing so will aid in improving the efficiency of Underground Injection Control Class VI permitting.
2	Develop procedures that identify which types of Class VI project information will be available to the public, and describe how and when the EPA will share that information with the public. Doing so will enhance transparency of the Underground Injection Control Class VI permitting process.
3	To ensure consistency with Federal Acquisition Regulation sections 17.503 and 35.017 and EPA policy, prepare a market analysis or other documentation assessing the extent to which the services the EPA obtains in support of its Underground Injection Control Class VI Program through the Department of Energy's National Laboratories places Federally Funded Research and Development Centers in direct competition with domestic private industry. If the EPA determines that its use of Federally Funded Research and Development Centers places them in direct competition with domestic private industry, take action to ensure that the EPA obtains services for its Underground Injection Control Class VI Program consistent with the Federal Acquisition Regulation and EPA policy. Doing so will help ensure proper financial stewardship of the \$7,999,808 obligated for the interagency agreements with the Department of Energy and its National Laboratories.
4	To ensure proper financial stewardship of Agency resources, notify the Department of Energy and its National Laboratories about the monthly progress report deliverables required by the statements of work under the Federal Technical Assistance Program interagency agreements for the Underground Injection Control Program and ensure that all required elements are included in the monthly progress reports submitted by the National Laboratories. Doing so will help ensure that the EPA can appropriately track expenditures and work performed under the EPA's interagency agreements with the Department of Energy and its National Laboratories.

Human Health and Environmental Issues

Evaluation of Risks to Federal Facility Superfund Site Remedies from Sea-Level Rise or Increased Storm Surge

Report No. 25-N-0040 | Issued June 30, 2025

Forty-nine of the 157 federal facility Superfund sites on the National Priorities List are potentially at risk from sea-level rise or increased storm surge, which could impair the cleanup remedies that have been or are being implemented at those sites. Impaired remedies may result in the spread of contaminants; increase the risk of human and environmental exposure to these contaminants; and threaten the health, jobs, and environment of millions of U.S. residents. Further, the federal funds expended to implement those remedies would have been wasted. We did not issue any recommendations in this report.

What is Superfund?

The Comprehensive Environmental Response, Compensation, and Liability Act, which is commonly called Superfund, authorizes the EPA to clean up contaminated sites to protect human health and the environment. The sites that the EPA identifies for cleanup under this program are referred to as Superfund sites. The Superfund sites that have been prioritized for cleanup are included on the EPA's [National Priorities List](#).

Federal facility Superfund sites potentially at risk from sea-level rise or increased storm surge



Source: Data from the EPA, the National Oceanic and Atmospheric Administration, and the National Weather Service. (EPA OIG image)

Notes: Other U.S. territories not identified on this map do not have federal facility Superfund sites on the National Priorities List.

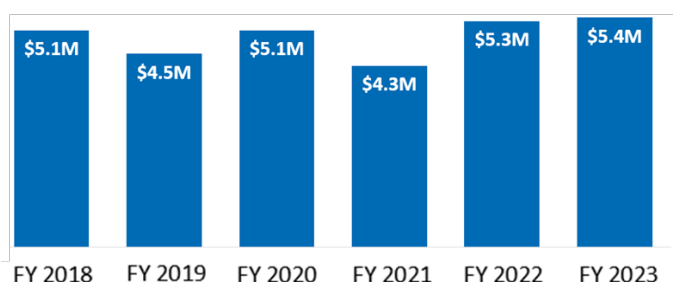
Audit of the EPA National Center for Radiation Field Operations' Preparedness

Report No. 25-P-0047 | Issued August 20, 2025

 Improving air quality. Ensuring the safety of chemicals.

The National Center for Radiation Field Operations needs to take steps to improve its preparedness to respond to radiological emergencies. While the center successfully conducted nonemergency responses, such as site assessments, it was not fully prepared for the one emergency response it conducted during the period we reviewed. EPA regions responded to most radiological incidents without participation from the center. This limited participation has led to the center being underutilized by the EPA and impedes the center's personnel from gaining valuable field experience. In addition, the center did not always meet annual exercise expectations, which further limited staff's experience.

The NCRFO's annual budget was about \$5 million from FY 2018 through FY 2023



Source: OIG analysis of the National Center for Radiation Field Operations budget.
(EPA OIG image)

Notes: M = Million. NCRFO = National Center for Radiation Field Operations.

Recommendations issued to the assistant administrator for Air and Radiation

No.	Recommendation
1	<p>Assess the National Center for Radiation Field Operations to determine the most efficient and effective use of the center's expertise and resources based on the Agency's responsibilities for responding to radiological emergencies and nonemergencies. The assessment should include but is not limited to the following:</p> <ul style="list-style-type: none"> a. The importance of the center to the EPA's operational readiness to respond to radiological incidents. b. The role of the center in meeting the EPA's responsibilities under the Nuclear/Radiological Incident Annex to the Response and Recovery Federal Interagency Operational Plan and the National Oil and Hazardous Substances Pollution Contingency Plan. c. The availability, expertise, and location of response personnel with specialized radiological knowledge within the EPA. d. The impact of the center on the mission success of other stakeholders—including EPA regions; state, local, and tribal responders; and other federal agencies such as the U.S. Department of Energy. e. Opportunities, such as site assessments, that exist to maximize the utility of the center's skills and expertise. <p>The optimal size and staff composition of the center.</p>
2	<p>Depending on the results of the Recommendation 1 assessment, develop a comprehensive strategy to improve the National Center for Radiation Field Operations' preparedness to ensure that it can effectively</p>

No.	Recommendation
	<p>fulfill its roles and responsibilities in responding to radiological emergencies. The strategy should include the establishment and implementation of the following:</p> <ul style="list-style-type: none"> a. A process to ensure that all Radiological Emergency Response Team staff participate in one national-level or Office of Radiation and Indoor Air-wide exercise annually to prepare for a radiological emergency and to confirm that the Radiological Emergency Response Team has plans and procedures that are regularly tested and practiced. A lessons-learned activity should be completed and documented for each exercise to identify areas in which additional training or preparation is required. b. A plan to promote the National Center for Radiation Field Operations' expertise and availability throughout the Agency to ensure that staff routinely participate in radiological site assessments to hone skills and abilities. c. A method to consistently document and track training for all employees and management. d. A succession plan. e. A plan to modernize equipment. f. A method to track all accountable equipment by documenting when equipment is issued, when equipment is returned, when equipment needs to be calibrated, and when equipment was calibrated. g. A review process that includes performance measures to ensure that the center is prepared to respond to a radiological emergency.

Lessons Learned from Prior Oversight of the EPA's Disaster Response Efforts



Report No. 25-N-0054 | Issued August 27, 2025


We initiated this project to describe lessons identified from select EPA OIG and U.S. Government Accountability Office oversight reports to help inform the EPA's future efforts to prepare for and respond to natural disasters. We reviewed 26 reports that identified strengths and areas for improvement. From those, we identified seven programmatic themes: (1) interagency and external stakeholder cooperation, (2) risk communication to the public, (3) data collection and characterization of risks, (4) policy development, (5) resource limitation, (6) contract management, and (7) resilience of contaminated sites and infrastructure. Since the nation has experienced an increase in the number of significant natural disasters, along with associated costs and human health-related impacts, the Agency can use this information to address historical and emerging challenges, which will better position it to achieve programmatic responsibilities while also ensuring fiscal responsibility. We did not issue any recommendations in this report.



The EPA responding to the Los Angeles wildfires.
(EPA image)

Evaluation of the EPA's Oversight of State and Local Ambient Air Monitoring Operating Schedules

Report No. 25-E-0051 | Issued September 17, 2025 |  

 Improving air quality. Compliance with the law.

Our statistical analyses indicate that pollution levels increase when certain air quality monitoring sites are offline. When some sites were offline, whether because of maintenance or other reasons, fine particulate matter air pollution increased on average by about 4 percent for monitoring sites that operated daily and 9 percent for monitoring sites that operated once every three days. Further analyses indicated that about 36 percent of sites that operated intermittently rather than daily had worse air quality on average when they were offline. The results of our analyses demonstrate that there is a risk of underreported air pollution, and two factors may contribute to this. First, the EPA publishes its intermittent air monitoring schedule on its website, creating an opportunity for regulated entities to time peak emissions for when a monitoring site is offline. Second, although EPA staff review air monitoring data, the EPA does not have the capacity to identify underreported air pollution within such a large volume of air quality data. This limitation creates opportunities for state and local air monitoring agencies to strategically turn off monitoring sites on days that they expect high pollution. These entities may engage in these strategies to avoid the EPA designating an area as in nonattainment with the air quality standards. Without data that are representative of the actual air quality, people may be exposed to harmful and hidden levels of air pollution, leading to serious health consequences.


Recommendations issued to the assistant administrator for Air and Radiation

No.	Recommendation
1	Restrict the distribution of the intermittent monitoring schedule to state, local, and tribal air monitoring agencies and associated labs, and work with state, local, and tribal air monitoring agencies and associated labs, as appropriate, to limit or otherwise discourage broader dissemination of and access to the intermittent monitoring schedule. This restriction and related collaboration would reduce the risk of regulated entities using the schedule to time their peak emissions for when a monitoring site is offline.
2	Implement a regular screening process that uses alternative air pollution measurements to detect monitoring sites that may be underreporting air pollution and that flags those sites for EPA region and state and local air monitoring agency follow-up, as appropriate. This process would improve Agency oversight by yielding data that cover periods when monitoring sites are offline and, therefore, better inform air quality and human health protection-related decision-making.

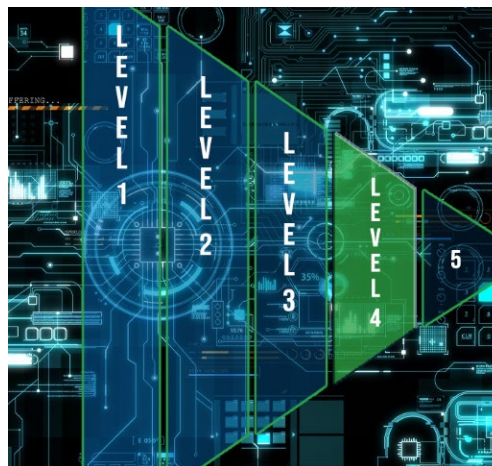
Business Practices and Accountability

Audit of the EPA's Compliance with the Federal Information Security Modernization Act for Fiscal Year 2024

Report No. 25-P-0023 | Issued April 2, 2025 | 

 Compliance with the law. Operating efficiently and effectively.

We assessed the EPA's information security program effectiveness against the Office of Management and Budget's FY 2023–2024 *Inspector General Federal Information Security Modernization Act of 2014 (FISMA) Reporting Metrics*. The Agency achieved Level 4 ratings for 30, or 81 percent, of 37 FY 2024 metrics. Overall, we concluded that the EPA achieved a maturity level of Level 4 for five security functions and nine domains. The EPA had deficiencies related to a complete and accurate inventory of EPA information systems and software asset management data.





The five security levels, with the EPA's overall maturity level (Level 4) highlighted, overlaying information security imagery. (EPA OIG image)

Recommendations issued to the assistant administrator for Mission Support

No.	Recommendation
1	Develop and implement procedures for validating systems inventory data received by the region and program office senior information officers.
2	Develop and implement procedures to reconcile software purchase data in the software asset management tool with software installations.
3	Document the software asset management tool's designation as the system of record for the Agency's enterprise software asset management and instruct senior information officials and relevant information technology personnel of that designation.

Independent Audit of the EPA's Fiscal Years 2023 and 2022 (Restated) Pesticide Registration Fund Financial Statements

Report No. 25-F-0024 | Issued April 16, 2025 | 

 Operating efficiently and effectively.

We rendered an unmodified opinion on the EPA's FYs 2023 and 2022 (Restated) Pesticide Registration Fund financial statements, meaning that the statements were fairly presented and free of material misstatement. However, we noted the following material weakness: the EPA materially misstated the on-top adjustment involving the Pesticide Registration Improvement Act income and expenses from other appropriations in its FY 2023 draft financial statements by over \$2.6 million. An on-top adjustment is a journal entry that is made at the end of an accounting period to adjust the accounts to accurately reflect revenues and expenses of the current period. We did not identify any noncompliance that would result in a material misstatement to the audited financial statements. In addition, the Agency complied with the statutory decision-time review periods.



Pesticide sprayers are used to control weeds and insects in field crops.
(EPA image)

Recommendations issued to the chief financial officer

No.	Recommendation
1	Correct the calculation in the Pesticide Registration Improvement Act Fund financial statement 23-02A on-top adjustment to accurately capture the amounts for footnote 8, "Income and Expenses from Other Appropriations (Restated)."
2	Develop and implement standard operating procedures for calculating Pesticide Registration Improvement Act Fund income and expenses from other appropriations.

Quality Control Review of Bacon & Company's Fiscal Year 2022 Single Audit of the Narragansett Bay Commission

Report No. 25-N-0025 | Issued April 23, 2025

Bacon & Company complied with applicable auditing standards and federal requirements when it performed the FY 2022 single audit of the Narragansett Bay Commission. During our review, we identified an error in Bacon & Company's major program determination for compliance testing. However, this error did not impact the overall quality of the single audit. As a result, we assigned Bacon & Company a pass rating. We did not issue any recommendations in this report.




View of the Sakonnet River, the eastern arm of the Narragansett Bay, in Rhode Island.
(U.S. Geological Survey image)

Single audits

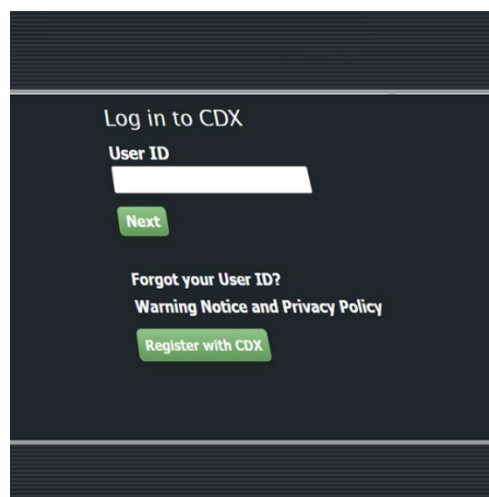
Pursuant to the Single Audit Act, as amended, effective during the relevant time period, and 2 C.F.R. Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, commonly referred to as the *Uniform Guidance*, any nonfederal entity that expended \$750,000 or more in federal funds in a fiscal year is required to have a single or program-specific audit. During a single audit, an auditor reviews the nonfederal entity's financial statements and federal awards.

Audit of the EPA's Central Data Exchange System Report

Report No. 25-P-0028 | Issued April 30, 2025

 Operating efficiently and effectively.


The EPA needs to strengthen management and access security controls for its Central Data Exchange system, which allows companies, states, tribes, and other regulated entities to electronically report and transfer their environmental data securely within and outside the EPA. The security of the Central Data Exchange system is integral to the EPA accepting electronic environmental data for the Agency's air, water, hazardous waste, and toxics release inventory programs. Without adequate security controls, the Central Data Exchange is vulnerable to threat actors exploiting weak security controls to potentially gain unauthorized access, create fraudulent accounts, and enter unreliable data into the system.



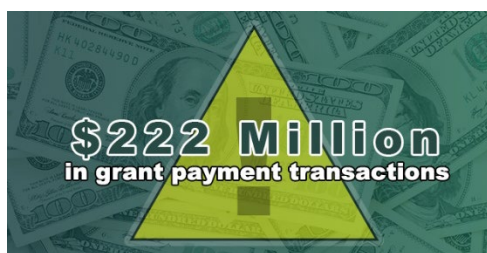
The Central Data Exchange login screen.
(EPA OIG image)

Audit of the EPA's Fiscal Year 2024 Compliance with the Payment Integrity Information Act of 2019

Report No. 25-P-0033 | Issued May 27, 2025 | 

 Compliance with the law.

The EPA did not comply with applicable Office of Management and Budget requirements for the Payment Integrity Information Act of 2019 for its FY 2024 reporting. For its grants payment stream, the EPA published a 0.77 percent improper payment estimate with no unknown payments, but the estimate was not based on an accurate sampling and estimation methodology plan. The plan was not accurate because the Agency excluded approximately \$222 million in grant payment transactions from its statistical sample population universe and did not maintain supporting documentation of its sample selection. Therefore, we could not determine whether the published estimate is valid and representative of the grant program characteristics. In addition, the EPA needs to improve its risk assessment documentation to ensure compliance with policies and procedures. The Agency completed corrective actions for the three recommendations from our FY 2023 audit report and for one recommendation from our FY 2021 audit report.



Payment integrity issues resulted in the exclusion of \$222 million in grant payment transactions from the EPA's population universe. (EPA OIG image)


Recommendations issued to the chief financial officer

No.	Recommendation
1	Develop and implement guidance to annually review, and update as needed, the Sampling and Estimation Methodology Plan. At a minimum, consider legislative, funding, structural, and any other changes impacting the EPA as part of its review to ensure that the Sampling and Estimation Methodology Plan accurately reflects the grants program universe.
2	Develop and document internal processes to ensure that all applicable grant recipients and transactions are included in the sampling population universe and sampling frame so that the EPA produces a valid improper payment and unknown payment estimate.
3	Update the June 2019 Sampling and Estimation Methodology Plan and internal standard operating procedures to reflect changes to internal processes to optimize efficiency and effectiveness of the Sampling and Estimation Methodology Plan execution.
4	Perform statistical sample testing of the grants payment stream as part of the Payment Integrity Information Act of 2019 annual reporting for FY 2026 to effectively demonstrate payment integrity compliance. The statistical sample testing should utilize the updated Sampling and Estimation Methodology Plan and updated internal standard operating procedures to ensure that the EPA has an accurate improper and unknown payment estimate for the grants payment stream.
5	Require staff to maintain documentation to support its sample selection, risk assessment reviews, and determinations of whether the EPA programs or payment streams are susceptible to improper payments, so that the EPA has evidence of compliance with its policies and procedures.

No.	Recommendation
6	Develop and implement a process that requires staff to document and maintain documentation of any exceptions to payment integrity procedures to support the EPA's adherence to its internal policies and procedures.

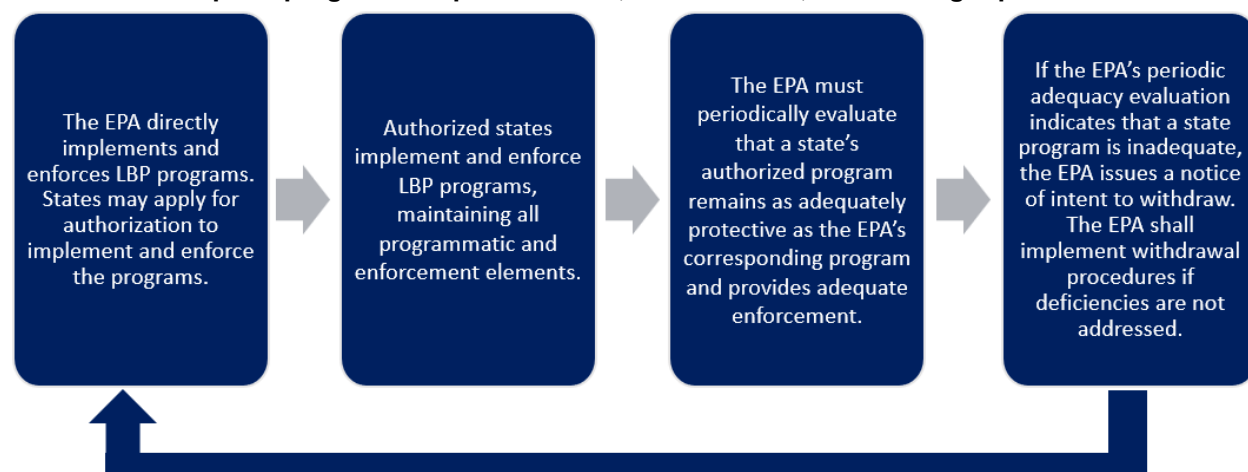
Evaluation of the EPA's Oversight of Authorized State Lead-Based Paint Programs

Report No. 25-E-0042 | Issued July 16, 2025 | 

 Compliance with the law. Partnering with states and other stakeholders. Operating efficiently and effectively.

Because the EPA does not conduct periodic adequacy evaluations that meet regulatory requirements, the Agency is not verifying that authorized state lead-based paint programs remain at least as protective of human health and the environment as the federal programs and that the programs provide adequate enforcement after initial program authorization. In addition, the EPA Office of Chemical Safety and Pollution Prevention and the EPA Office of Enforcement and Compliance Assurance have not developed policies for the EPA regional offices to verify that authorized state lead-based paint programs continue to meet regulatory requirements after initial program authorization. As a result, the regional offices do not have the necessary tools to consistently conduct oversight of authorized state lead-based paint programs. Without changes to the EPA's oversight procedures, authorized state lead-based paint programs may not adequately protect public health, and children may suffer adverse and irreversible health effects.

The lead-based paint programs' implementation, authorization, and oversight process



Source: OIG analysis of 40 C.F.R. § 745.324. (EPA OIG image)

Note: LBP = Lead-Based Paint.

Recommendations issued to the assistant administrator for Chemical Safety and Pollution Prevention

No.	Recommendation
1	<p>In coordination with the assistant administrator for Enforcement and Compliance Assurance, develop guidance that:</p> <ol style="list-style-type: none"> Directs regional offices to conduct the periodic adequacy evaluations required by 40 C.F.R. § 745.324(g) for lead-based paint programs and specifies the expected frequency of the periodic evaluations and the programmatic elements required to evaluate the adequacy of an authorized

No.	Recommendation
	<p>lead-based paint program. Doing so will help verify that authorized state programs remain at least as protective of human health and the environment as the federal programs after initial authorization.</p> <p>b. Provides examples of what might constitute a “significant change” in the content or administration of an authorized lead-based paint program as it relates to 40 C.F.R. § 745.324(h)(1). This will help the EPA to specify the types of program changes that authorized states must report to their EPA regional offices.</p> <p>c. Provides examples of when the withdrawal process under 40 C.F.R. § 745.324(i) may be warranted for an authorized lead-based paint program. Doing so will help EPA staff communicate the circumstances that could result in a recommendation for authorized state program withdrawal to the delegated EPA official.</p>
2	<p>In coordination with the assistant administrator for Enforcement and Compliance Assurance, clarify the headquarters and regional offices’ oversight roles and responsibilities regarding state implementation of authorized Lead Based Paint Activities; Lead Renovation, Repair, and Painting; and Pre-Renovation Education programs consistent with 40 C.F.R. § 1.5 and EPA policy memorandums. With a clear understanding of roles and responsibilities, the EPA can more effectively implement its oversight functions.</p>

Recommendations issued to the assistant administrator for Enforcement and Compliance Assurance

No.	Recommendation
3	<p>In coordination with the assistant administrator for Chemical Safety and Pollution Prevention, develop guidance that:</p> <p>a. Directs regional offices to conduct the periodic adequacy evaluations required by 40 C.F.R. § 745.324(g) and specifies the expected frequency of the periodic evaluations and the enforcement elements required to evaluate the adequacy of an authorized program. Doing so will help verify that authorized state programs continue to provide adequate enforcement after initial authorization.</p> <p>b. Provides examples of what might constitute a “significant change” in the content or administration of an authorized lead-based paint program as it relates to 40 C.F.R. § 745.324(h)(1). This will help the EPA to specify the types of program changes that authorized states must report to their EPA regional offices.</p> <p>c. Provides examples of when the withdrawal process under 40 C.F.R. § 745.324(i) may be warranted for an authorized lead-based paint program. Doing so will help EPA staff communicate the circumstances that could result in a recommendation for authorized state program withdrawal to the delegated EPA official.</p>
4	<p>In coordination with the assistant administrator for Chemical Safety and Pollution Prevention, clarify the headquarters and regional offices’ oversight roles and responsibilities regarding state implementation of authorized Lead Based Paint Activities and Lead Renovation, Repair, and Painting, and Pre-Renovation Education programs consistent with 40 C.F.R. § 1.5 and EPA policy memorandums. With a clear understanding of roles and responsibilities, the EPA can more effectively implement its oversight functions.</p>

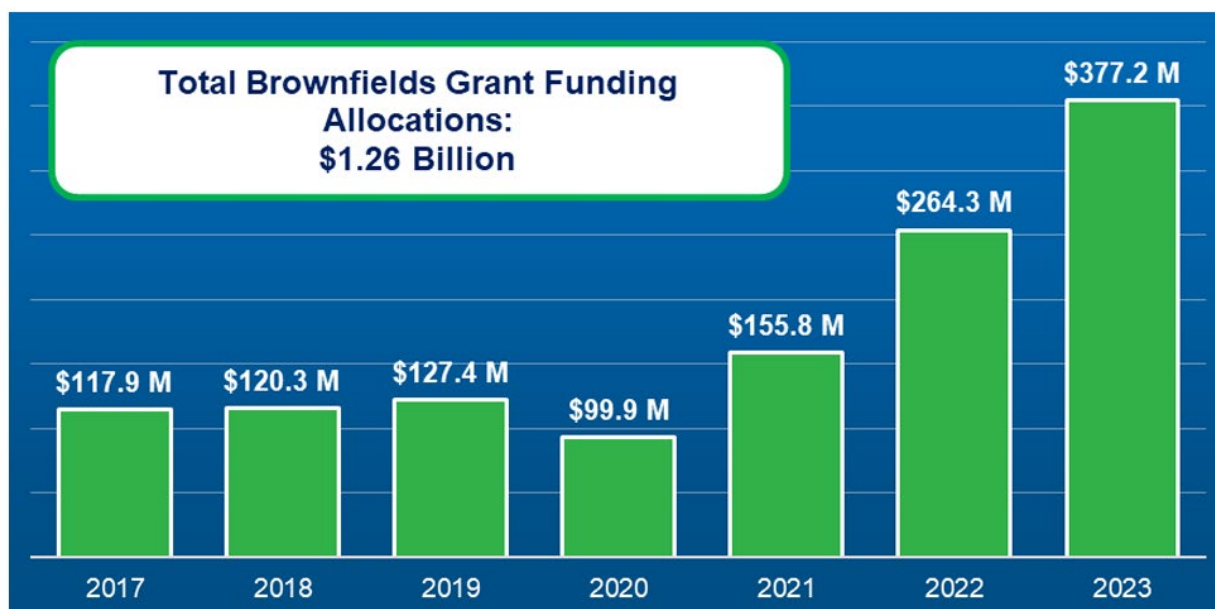
Audit of the EPA's Brownfields Program Management and Funding Allocations

Report No. 25-N-0044 | Issued July 23, 2025 | 

 Cleaning up and revitalizing land.

The EPA's brownfields funding allocations for FY 2023 were more than 200 percent higher than the average funding allocations from FY 2017 through 2021 because of increased program funding through the IIJA. We identified two areas that may warrant management attention and further research. These relate to data inaccuracies in the Agency's Grants Research Information Portal database and to the monitoring of a higher number of projects. We did not issue any recommendations in this report.

Total Brownfields Program grant funding allocations, FYs 2017–2023.



Source: Data from the Assessment, Cleanup and Redevelopment Exchange System and the Grants Research Information Portal. (EPA OIG image)

Note: M = million.

OIG Report to the Office of Management and Budget on the EPA's Semiannual Report on Purchase Card Violations

Report No. 25-N-0044 | Issued August 13, 2025 | 

The Government Charge Card Abuse Prevention Act of 2012 and Office of Management and Budget Circular No. A-123, Appendix B, direct each head of an executive agency with more than \$10 million in purchase card spending annually, and each inspector general of such an executive agency, to submit to the Office of Management and Budget director a joint semiannual report on purchase card violations. The EPA prepared the semiannual violations report covering the period between October 1, 2024, and March 31, 2025. The EPA reported no violations for the period. The OIG received no information that is inconsistent with the EPA's violation report for the reporting period. The OIG received one allegation of misuse of a government purchase card during this semiannual period, but a subsequent investigation determined that, although an unauthorized user accessed the purchase card, there was no employee misuse. We did not issue any recommendations in this report.



U.S. federal government charge card. (GSA image)

Lessons Learned from Prior Oversight Related to the EPA's Rulemaking

Report No. 25-E-0053 | Issued September 30, 2025


From our review of 17 prior EPA OIG and Government Accountability Office reports related to the EPA's rulemaking, we identified five lessons that we encourage the EPA to consider as it engages in future rulemaking efforts. These lessons are to improve rulemaking procedures, adhere to rulemaking procedures, document rulemaking decisions, update dockets, and commit to transparency in rulemaking activities. We did not issue any recommendations in this report.

Rulemaking, or writing regulations, is one of the main ways that the EPA achieves its mission of protecting human health and the environment. In fact, the EPA is one of the most active regulatory agencies in the federal government.

U.S. Chemical Safety and Hazard Investigation Board

Audit of the U.S. Chemical Safety and Hazard Investigation Board Payment Integrity Information Act Reporting for Fiscal Year 2024


Report No. 25-P-0032 | Issued May 27, 2025 | 

 Compliance with the law.

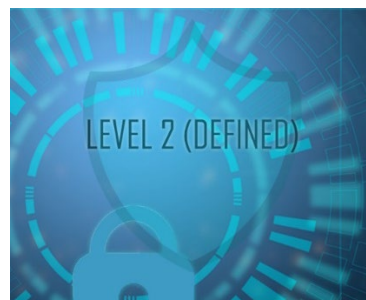
In FY 2024, the CSB complied with the Payment Integrity Information Act and Office of Management and Budget improper payment requirements. The outlays for the CSB totaled \$11.34 million. The CSB reported gross improper payments totaling \$2,659 that were associated with payroll and travel expenses. The CSB reported no unknown payments, resulting in a total improper and unknown payment of \$2,659, or 0.02 percent of total outlays. This total was significantly less than the statutory threshold of 1.5 percent of program outlays established in Payment Integrity Information Act for improper and unknown payments. In addition, we confirmed that the CSB complied with Payment Integrity Information Act reporting requirements to (1) publish payment integrity information with the Agency's annual financial statement and accompanying materials and (2) post the annual financial statement and accompanying materials on its website. We did not issue any recommendations in this report.

Audit of the U.S. Chemical Safety and Hazard Investigation Board's Compliance with the Federal Information Security Modernization Act of 2014 for Fiscal Year 2024

Report No. 25-P-0037 | Issued June 17, 2025 | 

 Creating and maintaining an engaged, high-performing workforce.

Contractor SB & Company assessed the CSB's compliance with *Fiscal Year 2023–2024 Inspector General Federal Information Security Modernization Act of 2014 Reporting Metrics*, concluding that the Agency achieved an overall maturity of Level 2, Defined, in FY 2024. This means that the CSB's information security policies, procedures, and strategies were formalized and documented but not consistently implemented. SB & Company identified one area of needed improvement: that the CSB should ensure its information can be reliably accessed in a timely manner even if key personnel are absent. Specifically, the CSB should ensure that its deputy chief information officer position is filled or that another CSB representative is available to respond to Federal Information Security Modernization Act of 2014 inquiries.



A technology-themed image with the text "Level 2 (Defined)," representing that the CSB's information security program for FY 2024 was rated at Level 2. (EPA OIG image)


Recommendations issued to the chairperson for the CSB

No.	Recommendation
1	Develop a process for designating and maintaining personnel in key roles (permanent and/or temporary) to ensure the continuity of essential security functions including the availability to respond to FISMA inquiries.

Hotline Complaints

Evaluation of EPA Policies, Procedures, and Processes for ASPECT Flight Missions

Report No. 25-E-0034 | Issued June 2, 2025

 Operating efficiently and effectively.

When responding to the East Palestine, Ohio train derailment, the EPA deployed the Airborne Spectral Photometric Environmental Collection Technology, or ASPECT, aircraft at the request of the on-scene coordinator, per the existing Agency practice. The aircraft took off at 12:34 a.m. EST, 28 minutes after the issuance of the mission order, consistent with the contractual agreement that the aircraft take off within 90 minutes of a mission order during nonbusiness hours. Although a complaint submitted to the OIG Hotline alleged that the ASPECT aircraft did not follow normal Agency practice and that there was a several-day delay in activating ASPECT after the derailment, the emails and documents we reviewed and the interviews we conducted did not support the allegations. However, the documented procedures that were in place remain largely unknown to all involved stakeholders and lack the clarity needed to avoid negatively affecting decision-making related to an emergency response.



The EPA's ASPECT aircraft.

Source: The EPA's "ASPECT" web [page](#). (EPA image)

Recommendations issued to the assistant administrator for Land and Emergency Management:

No.	Recommendation
1	Develop a formal, written Airborne Spectral Photometric Environmental Collection Technology deployment procedure to include such items as a decision tree and to facilitate the timely request for and deployment of the Airborne Spectral Photometric Environmental Collection Technology aircraft. Doing so would help ensure the timely receipt of and response to Airborne Spectral Photometric Environmental Collection Technology deployment requests.

No.	Recommendation
2	Regularly train the EPA on-scene coordinators on the new formal, written procedure developed in response to Recommendation 1. Doing so would better inform emergency response decision-making and help ensure the timely receipt of and response to Airborne Spectral Photometric Environmental Collection Technology deployment requests.
3	Develop and implement a contact system, such as a central phone number or an automated routing system, to ensure the timely receipt of and response to Airborne Spectral Photometric Environmental Collection Technology deployment requests.
4	Update the Airborne Spectral Photometric Environmental Collection Technology fact sheet to list the full range of capabilities, including temperature sensitivity, and share the fact sheet with the EPA on-scene coordinators. Doing so would better inform emergency response decision-making so on-scene coordinators know the full extent of the aircraft's capabilities.

2.2 Investigative Work

Section 5(a)(3) of the Inspector General Act, 5 U.S.C. § 405, requires a summary of significant investigations that were closed during the reporting period. We also report investigations that have not yet been officially closed but in which there has been significant activity, including convictions or guilty pleas, during the reporting period. Section 5(a)(13) of the Inspector General Act requires that we report on each investigation involving a senior government employee in which allegations of misconduct were substantiated.

Closed Significant Investigations

Individual Sentenced for Conducting Fraudulent Vehicle Inspections

On June 30, 2025, a North Carolina individual was sentenced in the U.S. District Court for the Eastern District of North Carolina to 24 months of probation and was ordered to pay a \$500 fine for knowingly, intentionally, and fraudulently conspiring with others to conduct fraudulent vehicle inspections in violation of the Clean Air Act. On November 7, 2024, another coconspirator, a North Carolina businessperson, was sentenced in the U.S. District Court for the Eastern District of North Carolina to three years of probation—with the first year of probation under home detention and 15 days of intermittent confinement following home detention—and was ordered to pay a \$40,000 fine. The individuals were sentenced in connection with conducting fraudulent inspections of almost 15,000 vehicles over a five-year period. The individuals profited from this scheme and artifice by charging the vehicle owners well more than the typical cost of a genuine vehicle registration.

This was a joint investigation with the EPA Criminal Investigation Division.

Company and One of Its Subsidiaries Agreed to Pay \$4 Million to Resolve Allegations Related to Falsely Certifying Compliance with Federal Regulations

On July 3, 2025, an environmental development and engineering services company with primary headquarters in Canada, in conjunction with one of its subsidiaries that it acquired in 2021, agreed to pay \$4 million to resolve allegations that they violated the civil False Claims Act by submitting or causing the submission of applications to the EPA for Brownfields Assessment Grants that falsely certified compliance with federal procurement regulations. It was alleged that from 2014 through 2022, the company, through its subsidiaries, drafted or helped draft requests for proposals and statements of work associated with applications for the grants and then competed for and won the work for which they had drafted the specifications in violation of federal procurement requirements. It was also alleged that the companies falsely certified or caused the communities applying for the grants to certify that they had complied with applicable requirements.

Open Significant Investigations

Montana Property Manager and Company Sentenced for Charges Related to Lead-Based Paint Disclosures and Mitigation at Fort Harrison Veteran Housing

On April 14, 2025, a Montana real estate agent and property manager was sentenced in the U.S. District Court for the District of Montana to three years of probation and was ordered to pay a \$150,000 fine. On November 5, 2024, the individual pleaded guilty to one count of knowing endangerment for failing to provide required lead-based paint disclosures from September 2019 through September 2021 to veterans residing in housing at Fort Harrison in Helena, Montana. As a result, the veterans and their families were exposed to significant levels of lead.

Additionally, on April 14, 2025, a hazardous-material-mitigation company based in Kalispell, Montana, was sentenced to two years of probation and ordered to pay a \$50,000 fine and \$348,000 in restitution to the U.S. Department of Veterans Affairs for filing false reports for payment. On November 5, 2024, the company pleaded guilty to one count of False Claims Act conspiracy for filing false requests for payment for abatement of lead paint. Specifically, the company submitted 11 subcontractor requisitions for payment claiming that it had performed lead-based paint work when it had not. These requisitions were submitted through other companies to the Department of Veterans Affairs and paid for with federal funds.

This is a joint investigation with the U.S. Department of Housing and Urban Development OIG, the Department of Veterans Affairs OIG, and the EPA Criminal Investigation Division.

Contract Terminated for Violations Related to the Use of a Foreign Subcontractor

On June 6, 2025, the EPA issued a termination of contract for convenience to a company that was found to be in violation of the terms of an EPA Certified Laboratory Program contract. Although the contract expressly prohibited subcontractors, the company used subcontractors that were based in India to complete a portion of the data review and quality assurance and quality control functions of the contract. The foreign subcontractor submitted data on behalf of the company to the access-controlled EPA Contract Laboratory Program Support System, which was another contract violation. Originally, the EPA obligated a total of \$13,433,947.45 for the contract. At the time of termination, \$11,542,752.45 had been paid out, meaning that the investigation resulted in the de-obligation and cost savings of \$1,891,195.00.

Seven Family Members Pleaded Guilty to Charges Related Wire Fraud

On June 18, 2025, and June 24, 2025, seven family members, including a now-former EPA employee, pleaded guilty in the U.S. District Court for the Northern District of Texas to conspiracy to commit wire fraud. The seven individuals were indicted in December 2023 for conspiracy and wire fraud related to forgivable federal loans that they obtained through the Paycheck Protection Program, a program created in response to the COVID-19 pandemic to provide emergency financial assistance to existing small businesses. The seven individuals are scheduled to be sentenced after this semiannual reporting period.

One Individual Sentenced for and Another Individual Pleaded Guilty to Charges Related to Money Laundering

On June 20, 2025, an individual was sentenced in U.S. District Court for the District of Maryland to 27 months of imprisonment, 9 months of home detention, and two years of supervised release and was ordered to pay approximately \$2.5 million in restitution for conspiracy to commit money laundering. On April 1, 2025, another coconspirator pleaded guilty in the U.S. District Court for the District of Maryland to serving as the manager and supervisor of a large, multimember money laundering conspiracy that laundered more than \$20 million in fraudulent proceeds. Previously, on December 5, 2024, and December 12, 2024, 11 defendants, including the two previously mentioned individuals, were charged in superseding indictments in the U.S. District Court for the District of Maryland with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). The 11 individuals are expected to be sentenced in 2025.

According to the indictments, the defendants allegedly created and used limited liability companies and other shell businesses to open bank accounts for the purpose of receiving money that they fraudulently obtained from government agencies, organizations, and companies, including an environmental trust overseen by the EPA, an urban redevelopment program, a medical center, a transportation-and-logistics company, a school district, a college, a county government, and other victims. The defendants deceived the victims into sending money to them by, for example, providing the victims with false bank account information for legitimate vendor payments or with false wire transfer information for legitimate transactions. The defendants and their coconspirators then allegedly concealed and disguised the nature and source of the money through cash withdrawals, cashier's check purchases, debit card transactions, and transfers to other bank accounts controlled by the coconspirators.

This is a joint investigation with the U.S. Department of Homeland Security Homeland Security Investigations, the Internal Revenue Service Criminal Investigation Division, and the U.S. Department of War OIG Defense Criminal Investigative Service.

Former EPA-Contracted Security Guard Indicted on Charges Related to Impersonation, Assault, and Weapons

On July 8, 2025, a former EPA-contracted security guard was indicted in New Jersey Superior Court on multiple charges, including the impersonation of a federal agent, two counts of aggravated assault, aggravated assault on a domestic violence victim, stalking, possession of prohibited devices, possession of a large capacity ammunition magazine, unlawful possession of a weapon, possessing a prohibited weapon, and two counts of possession of a weapon for unlawful purposes.

This is a joint investigation with the EPA Criminal Investigation Division.

Lab Employees Indicted for Conspiring to Falsify Wastewater Test Results

On July 30, 2025, a Texas-based lab's chief executive officer, director of client services, and compliance coordinator were indicted in the U.S. District Court for the Southern District of Texas with one count of conspiring to falsify wastewater test results to meet pollutant limits from February 2021 through January 2024. The lab submitted the falsified test results to the EPA and the Texas Commission on Environmental Quality.

This is a joint investigation with the EPA Criminal Investigation Division and the Texas Commission on Environmental Quality.

Two Former U.S. Navy Employees Indicted for Allegedly Causing the U.S. Navy to Provide False Information Regarding the Red Hill Jet Fuel Spill

On August 28, 2025, two former U.S. Navy civilian employees were indicted in the U.S. District Court for the District of Hawaii for conspiracy to commit an offense against the United States and causing another person to make a materially false statement or a material omission. On May 6, 2021, two couplings on a pipeline at the Red Hill Bulk Fuel Storage Facility failed during an attempted transfer of jet fuel. Approximately 20,000 gallons of jet fuel from a storage tank flowed into the pipeline and then spilled into a tunnel. The attempted jet fuel transfer was then aborted. As the EPA-authorized regulator of Red Hill, the Hawaii Department of Health issued a request for information to the Navy regarding the spill. The two indicted individuals, while employed by the Navy, allegedly willfully caused the Navy to falsely state that the spill involved an estimated 1,618 gallons of jet fuel rather than the estimated 20,000 gallons that they knew had spilled, and they omitted the information and records material from the response to the request for information.

This is a joint investigation with the Department of War OIG Defense Criminal Investigative Service, the Naval Criminal Investigative Service, and the EPA Criminal Investigation Division.

Former Environmental Management Company Employees Indicted for Allegedly Directing Employees to Bypass Wastewater Treatment Processes, and Company Pleaded Guilty to Related Charges

On September 10, 2025, a former facility operations manager and a former plant supervisor for a Tennessee-based environmental management company were indicted in the U.S. District Court for the Middle District of Tennessee for conspiracy to defraud the EPA and to violate the Clean Water Act. The individuals allegedly directed employees at the environmental management company, which provides services related to hauling and treating nonhazardous liquid, to bypass treatment processes and discharge untreated and partially treated wastewater into the Nashville, Tennessee sewer system in December 2022 and January 2023. The indictment further alleged that the two individuals tampered with and caused the company's employees to tamper with a sampling device that the Metropolitan Government of Nashville and Davidson County placed to monitor the company's compliance with its pretreatment permit.

Previously, on August 5, 2025, the environmental management company pleaded guilty in the U.S. District Court for the Middle District of Tennessee to violating the Clean Water Act by skipping treatment processes in violation of its pretreatment permit. The company discharged untreated waste products directly into the sewer system at its Nashville facility, violating its permit from the Nashville Metro Water Services pretreatment permit program.

The company agreed to pay a \$512,000 fine and to complete a three-year term of probation. As a special term of probation, the company must comply with a previous state court order that it entered into with Nashville Metro Water Services to enact a facility operating plan. Additionally, as part of the state court order, the company paid \$86,628 to Nashville Metro Water Services for expenses related to sewer repairs and cleanup; \$299,576 for surcharges related to pollutant exceedances; and \$50,387 for

water and sewer charges. The company also agreed to implement several plant and equipment upgrades. Sentencing is scheduled for December 15, 2025.

This is a joint investigation with the EPA Criminal Investigation Division.

Individuals and Nonprofit Organizations Debarred for Failing to Provide Required Information in Relation to an EPA Grant

On September 30, 2025, two individuals and two nonprofit organizations were debarred from participating in federal procurement and nonprocurement programs because they failed to comply with the terms and conditions of an EPA environmental justice collaborative problem-solving grant that was intended to support an Asthma Hotspot Action Plan. Specifically, the individuals and nonprofit organizations failed to provide required information and reports to the EPA. The period of debarments ranged from one year to three years.

Management Implication Reports

Management Implication Report: Office of Research and Development Scientific Integrity and Ethics Concerns

Report No. 25-N-0021 | Issued April 8, 2025

We identified concerns regarding the EPA Office of Research and Development’s review and clearance process for manuscripts; its lack of oversight of published manuscripts, authorship designation, and lab visitors; and its failure to ensure that Office of Research and Development staff uphold federal ethical standards and Agency policies regarding impartiality and scientific integrity in the workplace. These issues enabled an Office of Research and Development researcher to disregard concerns that peer reviewers raised about a manuscript; to collaborate with family members on EPA work products without obtaining the proper waivers to guard against conflicts of interest; to add the researcher’s underaged child as a coauthor to a manuscript that had already been cleared by EPA management; and to bring unauthorized guests into an EPA lab and leave them unattended, despite established safety prohibitions. The OIG was not notified in a timely manner that the EPA had initiated its own internal investigation into these issues, which adversely affected the efficiency and effectiveness of our investigation. We notified the EPA of our concerns and related measures for improvement so that it could take whatever steps it deemed appropriate.

Management Implication Report: Terms and Conditions Listed Within the EPA’s Subaward Policy

Report No. 25-N-0026 | Issued May 12, 2025

We identified concerns regarding the terms and conditions listed within the revised EPA Subaward Policy. The Subaward Policy’s statements regarding subrecipient access to information about mandatory disclosure requirements and whistleblower protections and regarding the OIG’s right to access records are inconsistent, incomplete, and not easily navigable. While the Agency took action to incorporate other suggestions from our March 30, 2023 management implication report about mitigating grant

fraud vulnerabilities into its General Terms and Conditions, it did not choose to incorporate information about mandatory disclosure requirements and whistleblower protections into its Subaward Policy. The EPA's policies and guidance are silent as to a time frame and the criteria for mandatory disclosures. We notified the EPA of our concerns and suggested measures for improvement so that it could take whatever steps it deemed appropriate.

Management Implication Report: Extramural Research and Scientific Integrity Concerns

Report No. 25-N-0041 | Issued July 7, 2025

We identified a concern with the EPA's requirement that awardees submit federally funded extramural research reports to the EPA via email. Email providers go to great lengths to obscure the originating IP address from an email's header information. This makes it very difficult to determine the location from which the email was sent. The location is useful for identifying whether a research report was sent from within the United States. The EPA's 2025 Small Business Innovation Research Phase I solicitation states, "[F]or Phase I, the research or R&D [research and development] work must be performed in the United States." That requirement helps ensure that the Small Business Innovation Research award is fostering innovation within the United States. An out-of-country IP address may be a red flag indicating that the awardee performed research outside the United States. Further, if an IP address indicates that the submission originated from a foreign country of concern, the EPA should be concerned about whether the awardee is participating in a malign foreign talent recruitment program, which could result in the unauthorized transfer of intellectual property or other nonpublic information. Capturing IP addresses is a proactive method that could help the EPA identify bad actors and prevent the bad actors from receiving further federal funding. We notified the EPA of our concerns and suggested measures for improvement so that it could take whatever steps it deemed appropriate.

Management Implication Report: Unauthorized Use of Software on EPA Computers

Report No. 25-N-0049 | Issued September 22, 2025

We identified concerns regarding the installation and use of unauthorized software, specifically jiggler software, on EPA computers and networks. Commonly referred to as "mouse jiggers," jiggler software simulates activity on a laptop, preventing the laptop from entering sleep mode and locking out its user. Our investigation found that jiggler software could bypass the Agency's Windows Installer settings, that some of the EPA's information technology specialists believed they were exempt from the policy, and that other EPA employees and contractors installed the software without authorization. Furthermore, we discovered inconsistencies in how quickly the regional offices acted to remove the jiggler software after it was detected. The installation and use of unauthorized software on EPA computers and networks represent critical cybersecurity risks and ethics violations for the Agency. We notified the EPA of our concerns and related measures for improvement so that it could take whatever steps it deemed appropriate.

Senior Employee Investigations

The Administrative Investigations Directorate conducts administrative investigations of allegations of misconduct by senior Agency employees. Senior Agency employees include an officer or employee in the executive branch, including a special government employee as defined in 18 U.S.C. § 202, who occupies a position classified at or above the General Schedule 15 level or, in the case of positions not under the General Schedule, for which the rate of basic pay is equal to or greater than 120 percent of the minimum rate of basic pay payable for a GS-15 employee. Senior government employees include members of the Senior Executive Service; political appointees; and employees in scientific, professional, and senior-level positions.

Allegations that Four EPA Officials Failed to Report Assault Were Unsubstantiated

Four EPA officials—specifically, two Senior Executive Service employees and two GS-15 employees—allegedly failed to report allegations that an EPA employee assaulted a colleague, in violation of EPA Order 4711, *Procedure for Addressing Allegations of Workplace Harassment*. The investigation determined that there was insufficient evidence to show that any of the four officials were informed of the alleged assault. Accordingly, none of the officials had a duty to report the alleged assault under the EPA order.

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 either the OIG Office of Investigations or the OIG Administrative Investigations Directorate issues a report of investigation that has at least one supported allegation, it will generally request that the entity receiving the report—whether it is an office within the EPA, the CSB, or the OIG—notify the OIG within 60 days regarding the administrative action taken or proposed to be taken in the matter. When the Administrative Investigations Directorate issues a report of investigation pursuant to 41 U.S.C. § 4712, the entity receiving the report is statutorily required to take a specified action or deny relief within 30 days. 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- or 30-day period.

For this reporting period, we issued five reports of investigation to the EPA. We did not receive any responses outside the applicable 60-day or 30-day response periods, though the relevant response period had not elapsed for one report as of the end of the reporting period.

2.3 Instances of Whistleblower Retaliation and Interference with Independence

Whistleblower Retaliation

Section 5(a)(14) of the Inspector General Act, 5 U.S.C. § 405, 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.

On September 3, 2025, the OIG issued Report No. 25-N-0048, which substantiated allegations that a federally recognized Alaska Native tribal entity, an EPA grant recipient, terminated an employee in retaliation for the employee making several disclosures regarding potential grant fraud and gross mismanagement of an EPA grant or subgrant in violation of 41 U.S.C. § 4712. Specifically, the employee disclosed three main issues: alleged inaccurate fringe rates charged to the EPA through grants and subgrants; possible over-expenditures of EPA grant funds; and the chief operating officer's potential gross mismanagement of an EPA grant. The employee raised these issues to tribal leadership as they were discovered. We found that these protected disclosures were contributing factors in the employee's termination, and we determined that the tribe could not demonstrate by clear and convincing evidence that it would have terminated the employee in the absence of the protected disclosures. We recommended that the EPA administrator consider appropriate corrective action in light of these findings. In response to this report, the EPA determined that sovereign immunity barred it from taking action. Thus, the Agency denied the complainant relief under 41 U.S.C. § 4712(c)(1).

Interference with Independence

Section 5(a)(15) of the Inspector General Act, 5 U.S.C. § 405, requires a detailed description of any attempt by the EPA or the CSB to interfere with the independence of the OIG, including "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." We did not have any reportable instances of interference with independence this semiannual period.



To reach the EPA whistleblower protection coordinator, contact:

Email
whistleblower.protection@epa.gov

Phone
(202) 566-1513

2.4 The Trafficking Victims Prevention and Protection Reauthorization Act of 2022 Reporting

The Trafficking Victims Prevention and Protection Reauthorization Act of 2022, Pub. L. No. 117-348, requires additional governmental efforts to prevent human trafficking. The Act requires, among other things, that federal executive branch employees be subject to a policy that requires personnel to report to the applicable inspector general and agency trafficking-in-persons point of contact any suspected cases of misconduct, waste, fraud, or abuse relating to trafficking in persons. Section 122(e) of the Act requires that the OIG, in consultation with the Agency, report annually to Congress regarding (1) the number of suspected violations reported; (2) the number of investigations; (3) the status and outcomes of such investigations; and (4) any recommended actions to improve the programs and operations of the Agency.

For its annual reporting for FY 2025, the OIG consulted with the Agency and does not have any suspected violations to report and has not to date initiated any investigations related to trafficking.

Section 3: Statistical Data



3.1 Summary of Investigative Results

Section 5(a)(4) of the Inspector General Act, 5 U.S.C. § 405, requires a listing of the total convictions for the reporting period that resulted from investigations, and section 5(a)(11) of the Act requires statistical tables identifying the total number of investigative reports, the total number of people referred for criminal prosecution during the reporting period, and the total number of indictments and criminal informations during the reporting period that resulted from prior referrals to prosecuting authorities. Section 5(a)(12) of the Act requires a description of the metrics used for developing the data for the statistical tables required by section 5(a)(11). We also provide additional statistical information relating to the results of our investigative work, including cases and complaints opened, and the results of criminal, civil, and administrative actions.

Table 4: Summary of investigative activity

Investigative activity	Number
Cases open as of April 1, 2025*	145
Cases opened during period	75
Cases closed during period	49
Cases open as of September 30, 2025*	171
Preliminary inquiries open as of April 1, 2025	13
Preliminary inquiries opened during period	37
Preliminary inquiries closed during period	37
Preliminary inquiries open as of September 30, 2025	13

Source: OIG analysis of OIG investigative activity. (EPA OIG table)

* These cases include data from the Office of Investigations and the Administrative Investigations Directorate.

Table 5: Results of criminal and civil actions

Criminal and civil actions	EPA OIG only	Joint*	Total
Criminal indictments, informations, or complaints [†]	0	10 [‡]	10[‡]
Convictions [§]	0	4	4
Civil judgments, settlements, or filings	2	0	2
Criminal fines and recoveries	0	\$3,063,659.63	\$3,063,659.63
Civil recoveries	\$4,021,774.00	0	\$4,021,774.00
Prison time	0	27 months	27 months
Prison time suspended	0	0	0
Home detention	0	11 months	11 months

Criminal and civil actions	EPA OIG only	Joint*	Total
Probation	0	9 years	9 years
Community service	0	0	0

Source: OIG analysis of OIG investigative activity. (EPA OIG table)

* With one or more other federal agencies.

† Sealed indictments are not included in this category; however, previously sealed indictments that were unsealed during this reporting period are included, regardless of when the indictment occurred. Superseding indictments are also included.

‡ This includes one superseding indictment that occurred in the last semiannual reporting period. The OIG was not notified of the indictment until this semiannual reporting period.

§ The “convictions” category comprises finalized convictions with completed sentencings that were filed during the reporting period.

Table 6: Administrative actions

Administrative actions	EPA OIG only	Joint*	Total
Suspensions	5 [†]	0	5[†]
Debarments	4	1	5
Other administrative actions*	17	3	20
Total	26	4	30

Source: OIG analysis of OIG investigative activity. (EPA OIG table)

Note: This table includes data from the Office of Investigations and the Administrative Investigations Directorate.

* With one or more other federal agencies.

† This includes one suspension that occurred in the last semiannual reporting period. The OIG was not notified of the suspension until this semiannual reporting period.

Table 7: Administrative recoveries and cost savings

Administrative recoveries or cost savings	EPA OIG only (\$)	Joint (\$)*	Total (\$)
Administrative recoveries [†]	0.00	12,569.42	12,569.42
Cost savings	2,138,547.72 [‡]	153,432.00	2,291,979.72[‡]

Source: OIG analysis of OIG investigative activity. (EPA OIG table)

Note: This table includes data from the Office of Investigations and the Administrative Investigations Directorate.

* With one or more other federal agencies.

† Administrative recoveries include restitutions, reimbursements, fines, recoveries, repayments, and the dollar values of recovered government equipment.

‡ The cost savings includes \$658.72 that was saved in the last semiannual reporting period. The OIG was not notified of the savings until this semiannual reporting period.

Table 8: Summary of investigative reports issued and referrals for prosecution

Investigative activity	Number
Number of investigative reports issued	7
Number of persons referred to the Department of Justice for criminal prosecution	19

Investigative activity	Number
Number of persons referred to state and local authorities for criminal prosecution	3
Number of criminal indictments and informations resulting from any prior referrals to prosecutive authorities	10

Source: OIG analysis of OIG investigative activity. (EPA OIG table)

Note: Investigative reports comprise final, interim, and supplemental reports of investigation and referral memorandums. To calculate the number of referrals, we counted corporate entities as persons.

Table 9: Subjects of employee integrity investigations

Investigation status	Political appointee*	SES*	GS-15*	GS-14 and below**†	Total**†
Pending as of April 1, 2025	2	9	12	22	45
Open	3	5	2	22	32
Closed	1	3	2	16	22
Pending as of September 30, 2025	4	11	12	28	55

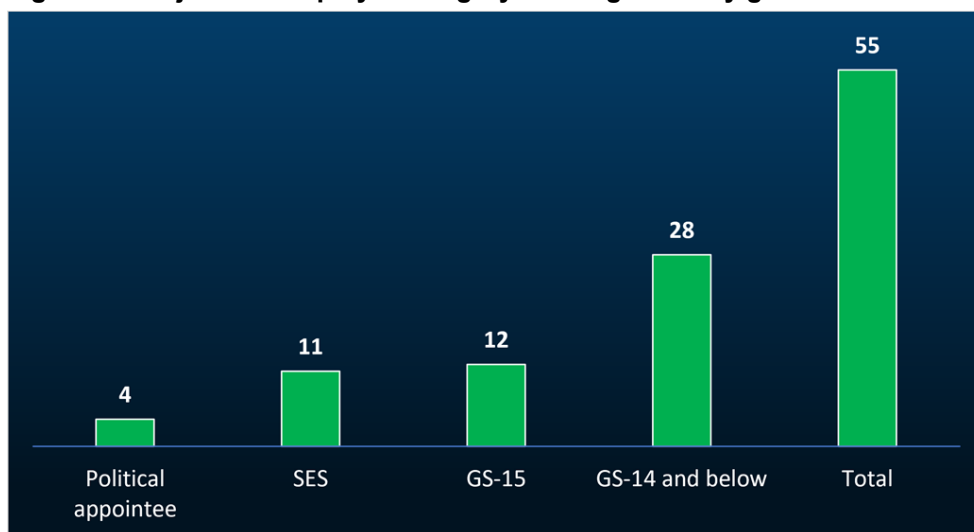
Source: OIG analysis of OIG investigative activity. (EPA OIG table)

Notes: This table includes data from the Office of Investigations and the Administrative Investigations Directorate. SES stands for Senior Executive Service. 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.

* Includes investigations for cases related to individuals who may also be former employees.

† Includes investigations for cases related to individuals who are compensated under other federal pay plans.

Figure 6: Subjects of employee integrity investigations by grade



Source: OIG analysis of OIG investigative activity. (EPA OIG image)

Notes: Numbers of pending investigations as of September 30, 2025. Includes investigations for cases related to individuals who may also be former employees and to individuals who are compensated under other federal pay plans. SES stands for Senior Executive Service.

Appendixes



Appendix 1: Reports Issued

Section 5(a)(5) of the Inspector General Act, 5 U.S.C. § 405, requires a listing of each audit, inspection, or evaluation report issued by the OIG during the reporting period. For each report, where applicable, the Act also requires identification of the dollar value of questioned costs, including unsupported costs, and the dollar value of recommendations that funds be put to better use, including whether a management decision had been made by the end of the reporting period. For more information on a report, please visit our [website](#).

Table A-1: Overview of evaluations, financial audits, performance audits, and projects

Evaluation or audit type	Number of reports issued	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)
Evaluations in accordance with the quality standards for inspection and evaluation. See Table A-2.	6	7,999,808.00	7,999,808.00	0.00
Financial audits in accordance with the generally accepted government auditing standards. See Table A-3.	1	0.00	0.00	0.00
Performance audits in accordance with the generally accepted government auditing standards. See Table A-4.	11	0.00	0.00	224,037,000.00
Project conducted in accordance with guidance other than the generally accepted government auditing standards or the quality standards for inspection and evaluation. See Table A-5.	5	0.00	0.00	0.00
Total	23	7,999,808.00	7,999,808.00	224,037,000.00

Source: OIG analysis of OIG reports. (EPA OIG table)

Table A-2: Evaluations in accordance with the quality standards for inspection and evaluation

Report number	Report title	Report issuance date	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)	Management decision*
25-E-0034	<i>Evaluation of EPA Policies, Procedures, and Processes for ASPECT Flight Missions</i>	6/2/25	0.00	0.00	0.00	Yes
25-E-0035	<i>Evaluation of the South Carolina Clean Water State Revolving Fund Program's Capacity to Manage Infrastructure Investment and Jobs Act Funding</i>	6/11/25	0.00	0.00	0.00	Yes

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Report number	Report title	Report issuance date	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)	Management decision*
25-E-0042	<i>Evaluation of the EPA's Oversight of Authorized State Lead-Based Paint Programs</i>	7/16/25	0.00	0.00	0.00	Yes
25-E-0045	<i>Evaluation of the EPA's Implementation of the Underground Injection Control Class VI Well Program</i>	7/28/25	7,999,808.00	7,999,808.00	0.00	Yes
25-E-0051	<i>Evaluation of the EPA's Oversight of State and Local Ambient Air Monitoring Operating Schedules</i>	9/17/25	0.00	0.00	0.00	Yes
25-E-0053	<i>Lessons Learned from Prior Oversight Related to the EPA's Rulemaking</i>	9/30/25	0.00	0.00	0.00	N/A
Total	6 Reports Issued	—	7,999,808.00	7,999,808.00	0.00	—

Source: OIG analysis of OIG reports that are in accordance with the quality standards for inspection and evaluation. (EPA OIG table)

* "Yes" indicates that there was a management decision made regarding all recommendations in the report. "N/A" indicates that the report did not have any recommendations requiring a management decision.

Table A-3: Financial audits in accordance with the generally accepted government auditing standards

Report number	Report title	Report issuance date	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)	Management decision*
25-F-0024	<i>Independent Audit of the EPA's Fiscal Years 2023 and 2022 (Restated) Pesticide Registration Fund Financial Statements</i>	4/16/25	0.00	0.00	0.00	Yes
Total	1 Report Issued	—	—	—	—	—

Source: OIG analysis of OIG reports that are in accordance with the generally accepted government auditing standards. (EPA OIG table)

* "Yes" indicates that there was a management decision made regarding all recommendations in the report.

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Table A-4: Performance audits in accordance with the generally accepted government auditing standards

Report number	Report title	Report issuance date	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)	Management decision*
25-P-0023	<i>Audit of the EPA's Compliance with the Federal Information Security Modernization Act for Fiscal Year 2024</i>	4/2/25	0.00	0.00	5,885,000.00	Yes
25-P-0028	<i>Audit of the EPA's Central Data Exchange System</i>	4/30/25	0.00	0.00	0.00	Yes
25-P-0030	<i>Audit of the EPA's Oversight of State Subrecipient Monitoring in the Clean Water State Revolving Fund Program</i>	5/13/25	0.00	0.00	0.00	Yes
25-P-0031	<i>Audit of EPA's Telework and Remote Work Program Locality Pay</i>	5/21/25	0.00	0.00	0.00	Yes
25-P-0032	<i>Audit of the U.S. Chemical Safety and Hazard Investigation Board Payment Integrity Information Act Reporting for Fiscal Year 2024</i>	5/27/25	0.00	0.00	0.00	N/A
25-P-0033	<i>Audit of the EPA's Fiscal Year 2024 Compliance with the Payment Integrity Information Act of 2019</i>	5/27/25	0.00	0.00	0.00	Yes
25-P-0036	<i>Audit of the EPA's Water Infrastructure Set-Aside Grants to Tribes</i>	6/16/25	0.00	0.00	218,152,000.00	Yes
25-P-0037	<i>Audit of the U.S. Chemical Safety and Hazard Investigation Board's Compliance with the Federal Information Security Modernization Act of 2014 for Fiscal Year 2024</i>	6/17/25	0.00	0.00	0.00	Yes
25-P-0043	<i>Audit of the EPA's Brownfields Program Management and Funding Allocations</i>	7/23/25	0.00	0.00	0.00	N/A
25-P-0046	<i>Audit of the EPA's Fiscal Year 2021 Environmental Justice Collaborative Problem-Solving Cooperative Agreements</i>	8/6/25	0.00	0.00	0.00	N/A
25-P-0047	<i>Audit of the EPA National Center for Radiation Field Operations' Preparedness</i>	8/20/25	0.00	0.00	0.00	No
Total	11 Reports Issued	—	—	—	224,037,000.00	—

Source: OIG analysis of OIG reports that are in accordance with the generally accepted government auditing standards. (EPA OIG table)

* "Yes" indicates that there was a management decision made regarding all recommendations in the report. "N/A" indicates that the report did not have any recommendations requiring a management decision. "No" indicates that there was not a management decision made regarding all recommendations in the report.

Appendix 1

Table A-5: Projects in accordance with guidance other than the generally accepted government auditing standards or the quality standards for inspection and evaluation

Report number	Report title	Report issuance date	Questioned costs (\$)	Unsupported costs (\$)	Funds put to better use (\$)	Management decision*
25-N-0025	<i>Quality Control Review of Bacon & Company's Fiscal Year 2022 Single Audit of the Narragansett Bay Commission</i>	4/23/25	0.00	0.00	0.00	N/A
25-N-0029	<i>Audit Follow-Up: Changes to Grant Information in the EPA's Grants Management System</i>	5/7/25	0.00	0.00	0.00	N/A
25-N-0040	<i>Evaluation of Risks to Federal Facility Superfund Site Remedies from Sea-Level Rise or Increased Storm Surge</i>	6/30/25	0.00	0.00	0.00	N/A
25-N-0044	<i>OIG Report to the Office of Management and Budget on the EPA's Semiannual Report on Purchase Card Violations</i>	8/13/25	0.00	0.00	0.00	N/A
25-N-0054	<i>Lessons Learned from Prior Oversight of the EPA's Disaster Response Efforts</i>	8/27/25	0.00	0.00	0.00	N/A
Total	5 Reports Issued	—	0.00	0.00	0.00	—

Source: OIG analysis of OIG reports that are not in accordance with generally accepted government auditing standards or the quality standards for inspection and evaluation. (EPA OIG table)

* "N/A" indicates that the report did not have any recommendations requiring a management decision.

Appendix 2: Management Decisions Relating to Reports Issued During Previous Reporting Periods

Section 5(a)(6) of the Inspector General Act, 5 U.S.C. § 405, requires information regarding “any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period.” For more information on a report, please visit our [website](#).

Table A-6: Management decisions on prior unresolved recommendations in this semiannual period

Report	Prior unresolved recommendations	Action office or official	Management decision	Decision date
Report No. 25-E-0016, <i>Evaluation of the EPA Office of Water’s Guidance to State Revolving Fund Programs for Implementing the Build America, Buy America Act Requirements</i> , issued February 19, 2025	2. Develop and issue guidance for documenting compliance with the Build America, Buy America Act requirements. The guidance should provide more detail on the potential consequences for noncompliance and include real-world scenarios and other job aids or resources. 3. Develop and issue guidance that explains how the adjustment period waiver impacts multiyear projects.	Assistant Administrator for Water	The Agency provided a response on April 18, 2025, which outlined the EPA’s planned corrective actions for Recommendations 2 and 3. The OIG believes the planned corrective actions meet the intent of Recommendations 2 and 3, and as of May 12, 2025, considers all recommendations for this report to be resolved.	4/18/25
Report No. 25-P-0014, <i>The EPA Left \$20 Million Unawarded in the Sewer Overflow and Stormwater Reuse Municipal Grants Program</i> , issued February 10, 2025	1. Update the implementation guidance for the Sewer Overflow and Stormwater Reuse Municipal Grants Program to include procedures to award and reallocate funds in a timely manner, and work with regions to accelerate the award of program funds.	Assistant Administrator for Water	The Agency provided a response on April 18, 2025, which outlined the EPA’s planned corrective actions for Recommendation 1. The OIG believes the planned corrective actions meet the intent of the recommendation, and as of May 14, 2025, considers all recommendations for this report to be resolved.	4/18/25
Report No. 25-P-0015, <i>EPA Guidance Addresses Implementation Requirements for Infrastructure Investment and Jobs Act for Drinking Water State Revolving Fund</i>	1. Provide clarification to state agency staff on their discretion to prioritize non- per- and polyfluoroalkyl substances over per- and polyfluoroalkyl substances projects, based on the most serious risk to human health.	Assistant Administrator for Water	The Agency provided a response on April 18, 2025, which outlined the EPA’s planned corrective actions for Recommendation 1. The OIG’S Office of Audit is communicating with the Office of Water’s audit follow-up coordinators to complete the corrective action for	4/18/25

Appendix 2

Report	Prior unresolved recommendations	Action office or official	Management decision	Decision date
<i>Emerging Contaminants Funding, but Clarification Is Needed Before More States Spend Funds</i> , issued February 12, 2025			Recommendation 1, and as of July 14, 2025, considers all recommendations for this report to be resolved.	
Report No. 25-E-0020, <i>Evaluation of Institutional Control Documentation in the Superfund Enterprise Management System on IIJA-Funded Sites</i> , issued March 19, 2025	5. Update Superfund Enterprise Management System 2.0 so that users can track planned institutional controls at Superfund sites or identify another mechanism that enables users to report on the status of planned or implemented institutional controls at Superfund sites programwide.	Assistant Administrator for Land and Emergency Management	The Agency provided a response on May 5, 2025, which outlined the EPA's planned corrective actions for Recommendation 5. The OIG believes the planned corrective actions meet the intent of the recommendation, and as of May 12, 2025, considers all recommendations for this report to be resolved.	5/5/25

Source: OIG summary of the Agency's management decisions during the reporting period. (EPA OIG table)

Appendix 3: Reports with Corrective Action Not Completed

Section 5(a)(2) of the Inspector General Act, 5 U.S.C. § 405, requires information regarding “an identification of each recommendation made before the reporting period, for which corrective action has not been completed, including the potential cost savings associated with the recommendation.” We define potential cost savings to be the sum of questioned costs plus funds to be put to better use.

This appendix contains tables with unimplemented recommendations that the OIG issued to the EPA in 29 reports from 2008 to March 31, 2025. There are 75 unimplemented recommendations for the EPA, with potential cost savings of over \$53.5 million. There are zero unimplemented recommendations for the CSB.

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 and Officials

OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCSPP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Enforcement and Compliance Assurance
OLEM	Office of Land and Emergency Management
OMS	Office of Mission Support
ORD	Office of Research and Development
OW	Office of Water
Region 2	
Region 3	
Region 4	
Region 5	
Region 6	
Region 9	
Science Advisor	

Appendix 3

EPA Reports with Unimplemented Recommendations

Table A-7: EPA reports with unimplemented recommendations by report category

Report category	Number of unimplemented recommendations	Potential cost savings in thousands (\$)
Administrative and business operations. See Table A-8.	14	129.00
Human health and environmental issues. See Table A-9.	61	53,438.00
Total	75	53,567.00

Source: OIG analysis of OIG final reports, EPA response memorandums, inspector general responses, and the EPA's Enterprise Audit Management System. (EPA OIG table)

Table A-8 provides the full text of recommendations issued to the EPA prior to this semiannual period that remain unimplemented. The table also includes the EPA's planned corrective action completion dates as of the report issuance date and any subsequent revisions the EPA made to those planned completion dates. The table reflects the status of recommendations as of September 30, 2025. For more information on a report, please visit our [website](#).

Table A-8: EPA administrative and business operations reports with unimplemented recommendations

Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
Report No. 25-F-0010, <i>Independent Audit of the EPA's Fiscal Years 2024 and 2023 (Restated) Consolidated Financial Statements</i> , issued November 15, 2024	OMS	4. In conjunction with the chief financial officer, develop and implement a standardized intake process for receipt of personal property, including application of property decals, as provided in EPA Manual 4832, <i>Personal Property Manual</i> .	10/15/25	—	—
Report No. 25-P-0007, <i>The EPA Should Improve Monitoring of 2022 Clean School Bus Rebate</i>	OAR	1. Develop and implement guidance for Clean School Bus Program personnel on reviewing Clean School Bus rebate recipients' use and management of rebate funds.	Unresolved	11/30/25	—

Appendix 3

Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
<i>Recipients' Use of Funds and Deployment of Buses and Infrastructure</i> , issued December 4, 2024					
Report No. 24-P-0043, <i>Great Lakes Restoration Initiative Grants Documented Most Achievements, but the EPA Could Improve Monitoring and Reporting</i> , issued June 3, 2024	Region 5	4. Submit the annual reports for the Great Lakes Restoration Initiative to Congress as required by the Clean Water Act.	12/31/25	—	—
Report No. 24-P-0028, <i>The EPA Should Improve Annual Reviews to Protect Infrastructure Investment and Jobs Act Grants to Clean Water State Revolving Funds</i> , issued March 14, 2024	OW	1. Implement procedures to ensure consistent Office of Water oversight of the annual review process in all regions and states, including reviewing checklists and all program evaluation reports and tracking recommendations made by the regions.	12/31/25	—	—
Report No. 22-P-0033, <i>Brownfields Program-Income Monitoring Deficiencies Persist Because the EPA Did Not Complete All Certified Corrective Actions</i> , issued 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. 5. Expand existing guidance to include a deadline for post-closeout annual report submission.	Rec. 1: Unresolved Rec. 5: Unresolved	Rec. 1: 9/30/27 Rec. 5: 9/30/27	—

Appendix 3

Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
Report No. 21-P-0042, <i>EPA Needs to Substantially Improve Oversight of Its Military Leave Processes to Prevent Improper Payments</i> , issued December 28, 2020	OMS and OCFO	<p>3. OMS and OCFO: 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.</p> <p>4. OMS and OCFO: 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.</p> <p>5. OMS and OCFO: 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.</p> <p>6. OMS and OCFO: 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 so that it may perform payroll audit calculations and recover any military offsets that may be due.</p> <p>7. OMS and OCFO: 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.</p>	<p>Rec. 3: 6/30/22</p> <p>Rec. 4: 9/30/21</p> <p>Rec. 5: 8/31/21</p> <p>Rec. 6: 8/31/21</p> <p>Rec. 7: 2/28/22</p> <p>Rec. 8: 2/28/22</p> <p>Rec. 9: 12/1/21</p>	<p>Rec. 3: 7/29/22, 6/3/27, 10/1/24,[†] 7/31/25, 10/31/25, 1/30/26</p> <p>Rec. 4: 3/31/22, 7/29/22, 9/3/26, 10/1/26</p> <p>Rec. 5: 12/15/21, 12/30/22, 8/31/26, 11/30/26</p> <p>Rec. 6: 12/15/21, 12/30/22, 8/31/26, 11/30/26</p> <p>Rec. 7: 9/30/22, 12/31/26, 4/1/27</p> <p>Rec. 8: 12/30/22, 2/28/27, 5/31/27</p> <p>Rec. 9: 12/1/22, 12/1/24, 12/1/27</p>	<p>Rec. 5: 11.00</p> <p>Rec. 6: 118.00</p>

Appendix 3

Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		<p>8. OMS and OCFO: 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.</p> <p>9. OCFO: 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.</p>			
Report No. 19-P-0195, <i>Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRIA Systems Need Improvement</i> , issued 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, 1/31/24, 12/31/25, 3/31/26	—

Note: An em dash (—) indicates that the column header does not apply to the report. For example, an em dash in the “revised planned completion dates” column means that there have been no revisions to the planned completion date as of September 30, 2025, and an em dash in the “potential cost savings” column means that no potential cost savings were identified. Unresolved means that at the time a recommendation was issued in an OIG final report, the OIG and the Agency had not agreed on corrective actions or a planned completion date, but a date in the “revised planned completion dates” column means the matter was later resolved.

Source: OIG analysis of OIG final reports, EPA response memorandums, and inspector general responses as well as the Agency's Enterprise Audit Management System. (EPA OIG)

* Potential cost savings is defined as questioned costs plus funds to be put to better use.

† The Agency revised the planned completion date; the new date was earlier than the previous revised planned completion date.

Appendix 3

Table A-9: EPA human health and environmental issues reports with unimplemented recommendations

Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
Report No. 25-E-0020, <i>Evaluation of Institutional Control Documentation in the Superfund Enterprise Management System on IIJA-Funded Sites</i> , issued March 19, 2025	OLEM	5. Update Superfund Enterprise Management System 2.0 so that users can track planned institutional controls at Superfund sites or identify another mechanism that enables users to report on the status of planned or implemented institutional controls at Superfund sites programwide.	Unresolved	6/30/26	—
Report No. 25-E-0016, <i>Evaluation of the EPA Office of Water's Guidance to State Revolving Fund Programs for Implementing the Build America, Buy America Act Requirements</i> , issued February 19, 2025	OW	<p>1. Develop and issue guidance that clarifies how to determine whether an item should be classified as a manufactured product and how to determine the cost of manufactured product components. The guidance should include other resources, such as job aids, examples, or flow charts.</p> <p>2. Develop and issue guidance for documenting compliance with the Build America, Buy America Act requirements. The guidance should provide more detail on the potential consequences for noncompliance and include real-world scenarios and other job aids or resources.</p> <p>3. Develop and issue guidance that explains how the adjustment period waiver impacts multiyear projects.</p> <p>4. Develop and issue clarifying guidance on the Build America, Buy America Act waiver request and determination process. The guidance should include job aids.</p>	<p>Rec. 1: 12/31/25</p> <p>Rec. 2: Unresolved</p> <p>Rec. 3: Unresolved</p> <p>Rec. 4: 12/31/25</p>	<p>Rec. 2: 12/31/25</p> <p>Rec. 3: 12/31/25</p>	—
Report No. 25-P-0015, <i>EPA Guidance Addresses Implementation Requirements for Infrastructure Investment</i>	OW	1. Provide clarification to state agency staff on their discretion to prioritize non- per- and polyfluoroalkyl substances over per- and polyfluoroalkyl substances projects, based on the most serious risk to human health.	<p>Rec. 1: Unresolved</p> <p>Rec. 2: 3/31/25</p> <p>Rec. 3: 5/1/25</p>	Rec. 1: 8/29/25, 9/30/25, 10/31/25, 1/15/26	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
<i>and Jobs Act for Drinking Water State Revolving Fund Emerging Contaminants Funding, but Clarification Is Needed Before More States Spend Funds</i> , issued February 12, 2025		<p>2. Provide supplemental guidance to the EPA regions and the state revolving fund managers on processing transfers between the Drinking Water State Revolving Fund and Clean Water State Revolving Fund involving Infrastructure Investment and Jobs Act funds to address emerging contaminants.</p> <p>3. Provide additional training on the supplemental guidance to EPA regional and state agency staff in a timely manner.</p>		<p>Rec. 2: 5/31/25, 8/29/25, 9/30/25, 1/31/26</p> <p>Rec. 3: 7/1/25, 9/30/25, 3/31/26</p>	
Report No. 25-P-0014, <i>The EPA Left \$20 Million Unawarded in the Sewer Overflow and Stormwater Reuse Municipal Grants Program</i> , issued February 10, 2025	OW	<p>1. Update the implementation guidance for the Sewer Overflow and Stormwater Reuse Municipal Grants Program to include procedures to award and reallocate funds in a timely manner, and work with regions to accelerate the award of program funds.</p> <p>2. Improve program reporting in the Sewer Overflow and Stormwater Reuse Municipal Grants Program by:</p> <ul style="list-style-type: none"> a. Completing the required report to Congress. b. Populating established data storage platforms with information to facilitate reporting on the program, such as that required by Congress. c. Establishing controls to ensure that in the future regions post all program grant files, including annual and final reports, to the appropriate established electronic mechanism. d. Updating the program implementation guidance to include electronic document storage requirements. 	<p>Rec. 1: Unresolved</p> <p>Rec. 2: 5/31/25</p>	<p>Rec. 1: 9/30/25, 12/31/25</p> <p>Rec. 2: 12/31/25, 3/31/26</p>	Rec. 1: 20,238.00
Report No. 25-E-0002, <i>Inadequate Execution of the 7th DWINSA Lead Service Line Questionnaire Led to</i>	OW	<p>1. Develop a process to identify unreliable lead service line data obtained from both the 7th Drinking Water Infrastructure Needs Survey and Assessment and future lead service line data collection efforts.</p>	<p>Rec. 1: Unresolved</p> <p>Rec. 3: Unresolved</p>	<p>Rec. 1: 7/31/25, 3/31/26</p> <p>Rec. 3: 3/31/26</p>	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
<i>Flawed Data Being Used to Allot Lead Service Line Replacement Funds</i> , issued October 22, 2024		3. If updates are necessary and appropriate based on the determination from Recommendation 2, adjust the Infrastructure Investment and Jobs Act lead service line allotments for fiscal year 2023 through fiscal year 2026 so that the allotted funds are commensurate with the lead service-line-replacement needs of each state.			
Report No. 24-E-0066, <i>The EPA Needs to Improve the Verification of Land-Use Controls at Resource Conservation and Recovery Act Corrective Action Facilities</i> , issued September 23, 2024	OLEM	<p>1. Provide guidance to EPA regions and authorized states on methods that they can use to verify land-use control status, such as reporting or onsite assessments.</p> <p>2. Define the minimum frequency for region and state verification that land-use controls remain operational—for example, verification every one, three, or five years.</p> <p>3. Update RCRAInfo to capture data on the operational status of land-use controls. This could be achieved by establishing national event codes for land-use control activities in RCRAInfo—for example, using Region 3's event codes as nationally defined event codes.</p> <p>4. Provide training to help regions and authorized states input and maintain land-use control data in RCRAInfo.</p> <p>5. Implement mechanisms to monitor land-use control status at the national level, such as annual reports from RCRAInfo that identify land-use controls that have not been verified at the minimum frequency to ensure they remain operational.</p>	<p>Rec. 1: 12/31/25</p> <p>Rec. 2: 12/31/25</p> <p>Rec. 3: 12/31/25</p> <p>Rec. 4: 6/30/26</p> <p>Rec. 5: 6/30/26</p>	—	—
Report No. 24-E-0055, <i>State Program Deficiencies and Inadequate EPA Oversight of State Enforcement Contributed to the Drinking Water</i>	OW Region 4 OECA	1. Region 4: Assess the Mississippi State Department of Health sanitary survey program to verify that it has appropriate rules, mechanisms, and authorities to ensure that public water systems take necessary steps to address significant deficiencies outlined in sanitary survey reports, per 40 C.F.R. § 142.16.	<p>Rec. 1: Unresolved</p> <p>Rec. 3: 6/30/25</p> <p>Rec. 4: Unresolved</p> <p>Rec. 5: Unresolved</p> <p>Rec. 6: Unresolved</p> <p>Rec. 7: 6/30/25</p>	<p>Rec. 1: 12/31/26</p> <p>Rec. 3: 8/10/25, 9/12/25, 9/30/25, 10/31/25, 1/15/26</p> <p>Rec. 4: 12/31/26</p>	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
<i>Crisis in Jackson, Mississippi</i> , issued August 12, 2024		<p>3. OW: Update the EPA's <i>Guidance Manual for Conducting Sanitary Surveys of Public Water Systems; Surface Water and Ground Water Under the Direct Influence (GWUDI) of Surface Water</i> (April 1999) and the EPA's <i>How to Conduct a Sanitary Survey of Drinking Water Systems</i> (August 2019) to include a sanitary survey checklist and a process for states to alert the EPA of public water systems with systemic issues, such as excessive distribution line breaks and frequent boil water notices, that individually may not rise to the level of a significant deficiency.</p> <p>4. Region 4: Verify that the Mississippi State Department of Health has procedures in place to ensure that water systems report compliance monitoring data to the state pursuant to 40 C.F.R. § 141.90, to include verifying that the Mississippi Public Health Laboratory has appropriate procedures in place.</p> <p>5. Region 4: Train Mississippi State Department of Health personnel on using and entering data into the Safe Drinking Water Information System/State Version software.</p> <p>6. Region 4: Evaluate whether the Mississippi State Department of Health is implementing procedures for the enforcement of federal and state drinking water regulations. If the Mississippi State Department of Health is not implementing enforcement procedures as required by Safe Drinking Water Act section 1413, consider whether procedures for rescinding state primacy for water systems should be initiated.</p> <p>7. OW/OECA: Develop guidance on the applicability and use of the EPA's Safe Drinking Water Act</p>		<p>Rec. 5: 9/30/25, 3/1/26</p> <p>Rec. 6: 12/31/26</p> <p>Rec. 7: 8/11/25, 9/12/25, 9/30/25, 10/31/25, 1/15/26</p>	

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		section 1442(b) grant authority to address public health in an emergency situation.			
Report No. 24-P-0049, <i>The EPA Did Not Ensure that Two of the Largest Air Oversight Agencies Identified and Inspected Potentially Significant Sources of Air Pollution</i> , issued July 24, 2024	OECA Region 6 Region 9	<p>1. OECA: Conduct in-depth evaluations to monitor the performance of EPA regional offices' oversight of delegated agencies' implementation of the EPA's <i>Clean Air Act Stationary Source Compliance Monitoring Strategy</i>.</p> <p>7. Region 6: In coordination with the Office of Enforcement and Compliance Assurance and the Texas Commission on Environmental Quality, determine a complete and accurate list of SM-80 sources in Texas and ensure that each <i>Clean Air Act Stationary Source Compliance Monitoring Strategy</i> plan includes a list of SM-80s along with an expected inspection date.</p> <p>8. Region 9: In coordination with the Office of Enforcement and Compliance Assurance and the South Coast Air Quality Management District, confirm that California's South Coast Air Quality Management District's list of SM-80 sources is complete and accurate and ensure that the district reports SM-80 data in the EPA's data systems by August 2025.</p> <p>9. Region 9: Collect and review California's South Coast Air Quality Management District's <i>Clean Air Act Stationary Source Compliance Monitoring Strategy</i> plan by October 2026 and biennially thereafter and ensure that each plan includes a list of SM-80 sources along with an expected inspection date.</p>	<p>Rec. 1: Unresolved</p> <p>Rec. 7: Unresolved</p> <p>Rec. 8: Unresolved</p> <p>Rec. 9: Unresolved</p>	<p>Rec. 1: 10/1/28</p> <p>Rec. 7: 4/1/26, 10/1/26</p> <p>Rec. 8: 10/1/26</p> <p>Rec. 9: 10/1/26</p>	—
Report No. 24-E-0032, <i>The EPA Needs to Improve Institutional Controls at the American</i>	Region 4	3. Identify and work with amenable private property owners within Operable Unit 3 of the American Creosote Works Inc. (Pensacola Plant) Superfund site and appropriate local governments to establish	Unresolved	9/30/27	5,400.00

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
<i>Creosote Works Superfund Site in Pensacola, Florida, to Protect Public Health and IIJA-Funded Remediation</i> , issued April 15, 2024		restrictive covenants on contaminated private parcels to prevent the disturbance and removal of impacted soil. Restrictive covenants not only would protect the public but also could protect the \$5.4 million Infrastructure Investment and Jobs Act-funded remediation by keeping hard surfaces and foundations in place over unremediated soil.			
Report No. 24-P-0029, <i>Multiple Factors Contributed to the Delay in Constructing Combined Sewer Overflow Tanks at the Gowanus Canal Superfund Site in New York City</i> , issued March 21, 2024	Region 2	<ol style="list-style-type: none"> 1. Closely monitor combined sewer overflow tank construction progress at the Gowanus Canal Superfund site and take immediate action, including enforcement actions if appropriate, if New York City misses any future tank project milestones from the 2021 administrative order. 2. Post on the EPA's public website the milestones from the 2021 administrative order regarding the Gowanus Canal Superfund site, New York City's progress towards completing these milestones, and any actions taken to ensure the city stays on schedule. 	Rec. 1: 3/31/29 Rec. 2: 3/31/29	—	—
Report No. 24-E-0023, <i>The EPA Needs to Determine Whether Seresto Pet Collars Pose an Unreasonable Risk to Pet Health</i> , issued February 29, 2024	OCSP	<ol style="list-style-type: none"> 2. Implement standard operating procedures on how to conduct domestic animal risk assessments for the active ingredients in pet products to support pesticide registration review decisions. 3. Implement a measurable standard to determine when a pet product poses unreasonable adverse effects in pets to support the pesticide registration review decision. 5. Establish and implement an additional data requirement for the premarket clinical testing of pet products that is consistent with the Veterinary International Conference on Harmonization Guideline GL9, <i>Good Clinical Practice</i>. 	Rec. 2: 12/12/25 Rec. 3: 12/12/25 Rec. 5: 12/12/25 Rec. 6: 12/12/25 Rec. 7: 12/12/25	—	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		<p>6. Assess what incident information is needed from registrants of pet products to determine when the EPA should take mitigation measures or other actions. Require pet product registrants to report that information to the EPA.</p> <p>7. Establish policies and procedures that result in consistent implementation of mitigation measures to address unreasonable adverse effects or conduct additional analysis to determine whether a pet product is causing unreasonable adverse effects.</p>			
Report No. 23-P-0032, <i>The EPA Must Improve Controls and Integrate Its Information System to Manage Fraud Potential in the Renewable Fuel Standard Program</i> , issued September 19, 2023	OAR	<p>7. Integrate key applications to reduce staff burden and to allow better oversight of Renewable Identification Number and Renewable Fuel Standard program requirements and engage the Office of Enforcement and Compliance Assurance in the integration process to ensure all inspection and enforcement data needs are addressed in the integrated system.</p> <p>8. Enhance or replace the Data Analysis and Reporting Tool to facilitate external information requests and Office of Enforcement and Compliance Assurance inspections.</p>	<p>Rec. 7: 9/30/28</p> <p>Rec. 8: 12/31/25</p>	—	—
Report No. 23-E-0012, <i>The EPA's Residential Wood Heater Program Does Not Provide Reasonable Assurance that Heaters Are Properly Tested and Certified Before Reaching Consumers</i> , issued February 28, 2023	OAR	<p>4. Incorporate the EPA's certification test report expectations set forth in the April 2022 corrective action list into the 2023 revisions to the New Source Performance Standards for residential wood heaters.</p> <p>5. Develop and adopt an EPA cord wood test method that is supported by data to provide the public reasonable assurance that certified appliances meet emission standards.</p>	<p>Rec. 4: Unresolved</p> <p>Rec. 5: Unresolved</p> <p>Rec. 6: Unresolved</p>	<p>Rec. 4: 11/30/27</p> <p>Rec. 5: 11/30/27</p> <p>Rec. 6: 11/30/27</p>	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		6. Establish mechanisms to promote independence between emissions testing labs and third-party certifiers.			
Report No. 22-E-0053, <i>The EPA Needs to Improve the Transparency of Its Cancer-Assessment Process for Pesticides</i> , issued July 20, 2022	OCSP	1. Issue guidance on when and how to conduct the kinetically derived maximum dose approach in cancer-risk assessments for pesticides. 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 <i>Final Information Quality Bulletin for Peer Review</i> .	Rec. 1: Unresolved Rec. 9: 6/30/24	Rec. 1: 6/30/24, 7/15/25, 12/31/25 Rec. 9: 12/31/24, 1/15/25, 12/31/25	—
Report No. 21-E-0186, <i>EPA's Endocrine Disruptor Screening Program Has Made Limited Progress in Assessing Pesticides</i> , issued 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. 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. 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. 4. Issue for public review and comment both the Environmental Fate and Effects Division's approach for	Rec. 1: 9/30/25 Rec. 2: 9/30/24 Rec. 3: 9/30/24 Rec. 4: 12/31/23	Rec. 1: 12/31/25 Rec. 2: 1/15/25, 12/31/25 Rec. 3: 7/15/26 Rec. 4: 12/31/25	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		the reevaluation of List 1–Tier 1 data and the revised List 1–Tier 2 wildlife recommendations.			
Report No. 21-P-0175, <i>EPA Should Conduct More Oversight of Synthetic-Minor-Source Permitting to Assure Permits Adhere to EPA Guidance</i> , issued July 8, 2021	OAR	<p>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.</p> <p>2. In consultation with the EPA regions, develop and implement an oversight plan to include:</p> <ul style="list-style-type: none"> 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. c. Procedures to resolve any permitting deficiencies identified during the initial and periodic reviews. <p>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</p>	<p>Rec. 1: 10/31/23</p> <p>Rec. 2: 10/31/24</p> <p>Rec. 3: 12/31/24</p> <p>Rec. 4: 10/31/24</p> <p>Rec. 5: 12/31/23</p>	<p>Rec. 1: 10/31/24, 12/31/25</p> <p>Rec. 2: 10/31/25, 12/31/26</p> <p>Rec. 3: 12/31/26</p> <p>Rec. 4: 12/31/26</p> <p>Rec. 5: 10/31/24, 12/31/25</p>	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		<p>assure continuous compliance with associated limits, and revise the regulatory requirements as appropriate.</p> <p>4. Revise the Agency's guidance to communicate its key expectations for synthetic-minor-source permitting to state and local agencies.</p> <p>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.</p>			
Report No. 21-E-0146, <i>EPA Deviated from Typical Procedures in Its 2018 Dicamba Pesticide Registration Decision</i> , issued 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 [†]	—
Report No. 21-P-0129, <i>EPA Should Conduct New Residual Risk and Technology Reviews for Chloroprene- and Ethylene Oxide-Emitting Source Categories to Protect Human Health</i> , issued May 6, 2021	OAR	<p>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.</p> <p>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.</p>	<p>Rec. 2: Unresolved</p> <p>Rec. 3: Unresolved</p> <p>Rec. 4: 9/30/24</p>	<p>Rec. 2: 9/30/24, 12/31/25</p> <p>Rec. 3: 9/30/28</p> <p>Rec. 4: 12/31/25</p>	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		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.			
Report No. 21-P-0122, <i>Improved Review Processes Could Advance EPA Regions 3 and 5 Oversight of State-Issued National Pollutant Discharge Elimination System Permits</i> , issued April 21, 2021	Region 3	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.	Unresolved	12/31/22, [†] 1/31/25, 3/31/25, 9/30/25, 5/31/26	—
Report No. 20-P-0173, <i>Further Efforts Needed to Uphold Scientific Integrity Policy at EPA</i> , issued 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. 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. 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	Rec. 6: 6/30/22 Rec. 7: 9/30/20 Rec. 8: 6/30/21	Rec. 6: 6/30/24, 6/30/26 Rec. 7: 4/30/22, 6/30/22, 3/31/23, 6/30/24, 6/30/26 Rec. 8: 6/30/22, 3/31/23, 6/30/24, 6/30/26	—

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Report	Action office	Unimplemented recommendations	The EPA's planned completion date at the time of report issuance	The EPA's revised planned completion dates	Potential cost savings in thousands (\$)*
		issues or senior officials, and specify when this process should be used.			
Report No. 18-P-0080, <i>EPA Needs to Evaluate the Impact of the Revised Agricultural Worker Protection Standard on Pesticide Exposure Incidents</i> , issued February 15, 2018	OCSPP	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.	Unresolved	12/31/22, 12/31/23, 6/28/24, 1/15/25, 7/15/25, 12/31/25	—
Report No. 08-P-0196, <i>Making Better Use of Stringfellow Superfund Special Accounts</i> , issued 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	27,800.00

Note: An em dash (—) indicates that the column header does not apply to the report. For example, an em dash in the “revised planned completion dates” column means that there have been no revisions to the planned completion date as of September 30, 2025, and an em dash in the “potential cost savings” column means that no potential cost savings were identified. *Unresolved* means that at the time a recommendation that was issued in an OIG final report, the OIG and the Agency had not agreed on corrective actions or a planned completion date, but a date in the “revised planned completion dates” column means the matter was later resolved.

Source: OIG analysis of OIG final reports, EPA response memorandums, and inspector general responses as well as the Agency’s Enterprise Audit Management System. (EPA OIG)

* Potential cost savings is defined as questioned costs plus funds to be put to better use.

† The OCSPP completed this corrective action on February 16, 2022. That was the date the OCSPP held its first annual training series on the office’s commitment to the *Scientific Integrity Policy* and principles and to promote a culture of scientific integrity. March 31, 2026, is the OCSPP’s planned final training date. The OCSPP has completed annual trainings for 2022 and 2023 on time and plans to host annual trainings until 2026 to implement this recommendation.

‡ This date was 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 Recommendation 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 Recommendation 2 but did not receive a revised planned completion date. After the OIG accepted the proposed corrective actions for Recommendation 2, Region 3 provided a revised planned completion date, which is reflected above.

Appendix 4: Closed Investigations Involving Senior Employees

Section 5(a)(13) of the Inspector General Act, 5 U.S.C. § 405, requires that we report on each investigation involving a senior government employee in which allegations of misconduct were substantiated. Section 5(a)(16)(B) 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. Below are details on each investigation we conducted involving senior employees that were not already reported in the previous sections of this document and that we closed during this semiannual reporting period.

Case Number: 2025-5930-31

An EPA Senior Executive Service employee allegedly had conflicts of interest that affected the employee's ability to perform job functions and was taking part in decision-making that the employee was recused from. After reviewing the allegations and consulting with the EPA Ethics Office, it was determined that the allegations were not supported.

Appendix 5: Peer Reviews Conducted

Section 5(a)(8) of the Inspector General Act, 5 U.S.C. § 405, 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)(9) 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)(10) 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.

This semiannual period, the EPA OIG completed an external peer review of the Department of the Interior OIG's inspection and evaluation organization. We conducted the review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Guide for Conducting Peer Reviews of Inspection and Evaluation Organizations of Federal Offices of Inspector General*, dated July 2023. The Department of the Interior OIG's inspection and evaluation organization received an external peer review rating of pass. In our opinion, the organization suitably designed and complied with its system of quality control, providing us with reasonable assurance that the organization performed and reported in conformity with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*. We issued our report about the results of our review to the Department of the Interior OIG on September 22, 2025.

Below are details regarding the most recent peer reviews that another OIG conducted of the EPA OIG. There are no outstanding recommendations from these peer reviews.

Audit

The U.S. Department of the Treasury OIG issued the most recent peer review report on our audit component on May 22, 2025. The peer review covered the three-year period that ended on September 30, 2023, and found that we suitably designed and complied with our system of quality control to provide reasonable assurance that we performed and reported work in conformity with applicable standards in all material respects. We received an external peer review rating of pass.

Evaluation

The Office of the Special Inspector General for Afghanistan Reconstruction issued the most recent peer review report on our evaluation component on April 11, 2024. The peer review covered the three-year period that ended on September 30, 2023, and found that our policies and procedures for the evaluation operations generally were consistent with the *Quality Standards for Inspection and Evaluation* standards addressed in the external peer review.

Appendix 5**Investigation**

The Amtrak OIG issued the most recent peer review report on our investigation component on August 3, 2023. The Amtrak OIG determined that our system of internal safeguards and management procedures for the investigative operations complied with the Council of the Inspectors General on Integrity and Efficiency quality standards and other applicable guidelines and statutes. The Amtrak OIG determined that our safeguards and procedures provided reasonable assurance that we conformed to professional standards in planning, executing, and reporting our investigations and using law enforcement powers.

Appendix 6: OIG Contact Information

To report potential fraud, waste, abuse, misconduct, or mismanagement, contact the OIG Hotline:

Online

Hotline Complaint [Form](#)

Phone

(888) 546-8740

Email

OIG.Hotline@epa.gov

For congressional and media inquiries, contact the Office of External Outreach & Communications using the information below:

Phone

(202) 566-2391

Email

OIG.PublicAffairs@epa.gov

To submit a general comment or question about the EPA OIG, contact us via one of the following methods:

Online

Contact [Form](#)

Mail

Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, N.W.
Mail Code: 2410T
Washington, D.C. 20460

Phone

(202) 250-8800

To suggest projects or provide input related to our project notifications, contact us via one of the following methods:

Email

OIG_WEBCOMMENTS@epa.gov (Use the subject “Suggestions for Projects”)

Mail

Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, N.W.
Mail Code: 2431T
Washington, D.C. 20460

Phone

(202) 566-2391



Whistleblower Protection

U.S. Environmental Protection Agency

The whistleblower protection coordinator's role is to educate Agency employees about prohibitions against retaliation for protected disclosures and the rights and remedies against retaliation. For more information, please visit our [website](#).

Contact us:



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EPA OIG Hotline: OIG.Hotline@epa.gov



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