

Semiannual Report to Congress: October 1, 2023–March 31, 2024

Published May 2024

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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 1.4 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 issuing during the reporting period; along with the total value of questioned costs (to include unsupported costs); total value of recommendations that funds to 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 1.4 |
| 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: Drinking water from a faucet, business email compromise graphics, and pets.
(EPA OIG, EPA OIG, and EPA images, respectively)

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

EPA Inspector General Hotline

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Washington, D.C. 20460
(888) 546-8740
OIG.Hotline@epa.gov

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

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Message to Congress

For more than a dozen years, the Office of Inspector General's oversight professionals have faced one seemingly inexorable fact: year after year, our budget has diminished while our responsibilities increase. Our fiscal year 2024 budget is now lower than it was in fiscal year 2011, while personnel costs have increased by approximately 24 percent and the cost of goods has increased by an estimated 35 percent. Similarly, the annual assessments from the Council of Inspectors General on Integrity and Efficiency have more than doubled since fiscal year 2016. As a result, we are now funded for 128 fewer oversight professionals in 2024 as compared to 2011, a decrease of over 35 percent.



Sean W. O'Donnell

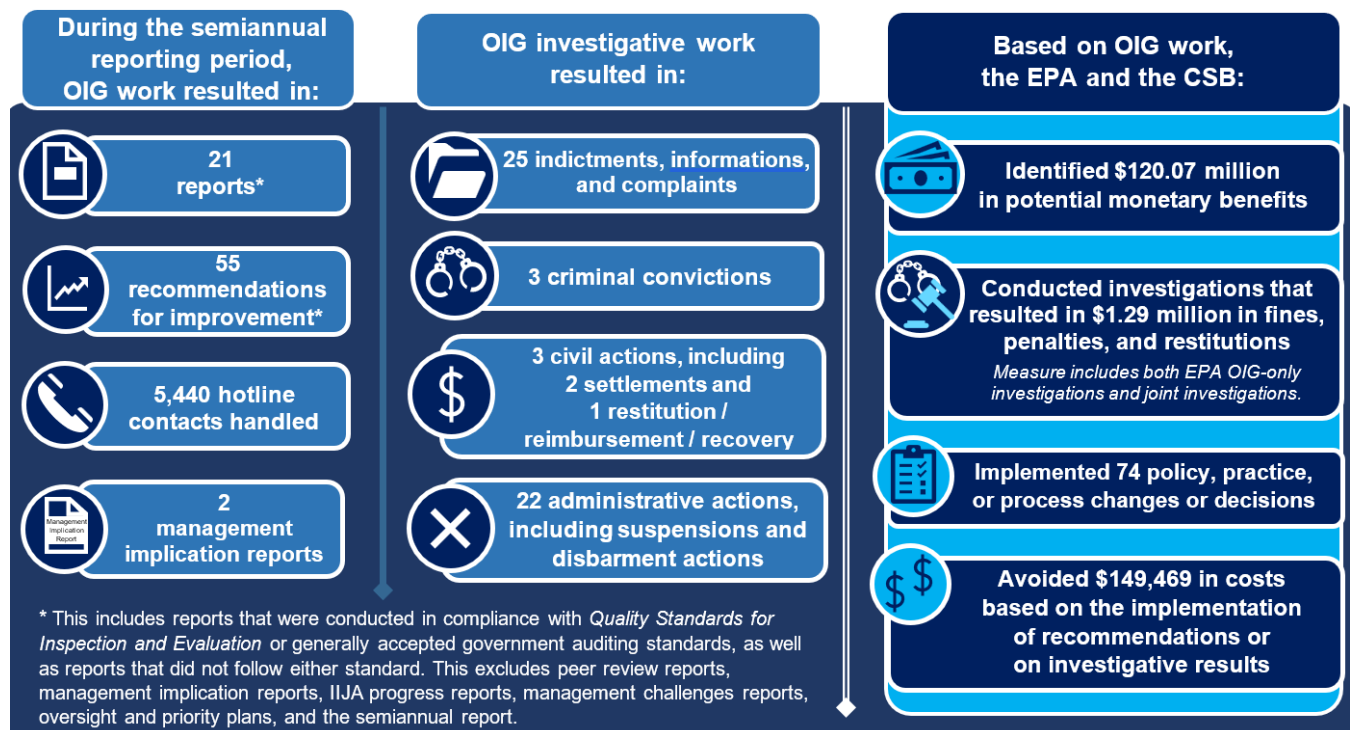
While the OIG decreases, the EPA has increased, seeing its budget effectively increased by nearly 13 percent over the same time. The Agency's overall topline level in fiscal year 2024 is lower than last year; however, most of the reduction was to its Superfund program, where new tax collections are intended to help offset the loss. Other areas of regular EPA activity that require our oversight have shown even greater growth, such as the market for Renewable Identification Numbers, or RINs, which has seen a nearly 77-percent increase in trading volume between 2011 and 2023. Practically, this means that we are now asked to oversight more core work with fewer resources than we had over a decade ago. And this has consequences.

The hallmark of an independent OIG is the ability to exercise discretion in our oversight of the Agency. Diminishing resources, coupled with a growing portfolio of mandated work, has significantly constrained this exercise of independence. For example, in fiscal year 2023, approximately half of our audit work was done in response to statutory or regulatory mandates, congressional requests, or hotline contacts. As another example, our portfolio of whistleblower retaliation cases is growing at the same time as we are being asked to do more administrative investigations of senior officials. Not to put too fine a point on it, but smaller OIG appropriations necessarily mean less oversight of EPA's growing operations.

The irony of an increasingly diminished OIG is that Congress, the Agency, and the American taxpayers are relying on us now more than ever. For example, last fiscal year, we issued a report on residential wood heaters, which identified more than \$80 million in potential waste and increased potential health risks because the EPA failed to provide reasonable assurance that wood heaters are properly tested and certified before reaching consumers. After our report's issuance, a bipartisan coalition of state attorneys general sued the EPA, alleging that it failed to revise standards for air pollution from wood heaters. And in Senate Report 118-83, the Senate specifically cited our report in directing the EPA to increase its staffing and other required efforts to support the wood stove certification and testing program. But most striking of all is that, as illustrated in the figure below, the OIG is a sound investment of American tax dollars. During the first half of this fiscal year, we have already identified \$120.1 million in total monetary benefits.

The benefit of our work extends beyond the dollars and cents of fraud, waste, and abuse. Because the EPA's mission is to protect human health and the environment, it is our mission to help the EPA do this more efficiently and effectively. For example, in response to multiple hotline complaints alleging that Seresto pet collars harmed family pets, we conducted an evaluation that concluded that the Agency's response to these reported incidents has not provided assurance that Seresto collars can be used without unreasonable risk to pet health. As another

example, we initiated an audit in response to a hotline complaint alleging that New York City has failed to construct two combined sewer overflow tanks at the Gowanus Canal Superfund site in a timely manner and that the EPA has failed to enforce administrative orders requiring the city to do so. We identified several factors that led to a 1,300-percent cost increase and 6.5-year schedule delay in the construction of the tanks, prolonging community exposure to pollutants that may cause cancer and other health effects.



Our robust efforts to oversee the EPA's more than \$60 billion in funds from the Infrastructure Investment and Jobs Act, or IIJA, demonstrate the level of oversight we can provide when properly funded. During this semiannual period, we published six IIJA-related reports, including an evaluation of the Drinking Water State Revolving Fund Program that could help the EPA ensure efficient stewardship of tens of billions of taxpayer dollars. We also issued two reports related to the EPA's \$5 billion Clean School Bus Program, an audit describing how potential utility delays could impact the program and a management implication report sharing our concerns that the EPA's lack of verification mechanisms within the program's rebate and grant application process increases risk for fraud, waste, and abuse. Another audit found that the EPA did not include any of its IIJA outlays in the fiscal year 2022 obligations and outlays it reported on USAspending.gov. Moreover, our agents and auditors have provided more than 350 fraud awareness briefings, reaching thousands of EPA staff members, potential grant recipients, and state environmental agencies, among other stakeholders.

Unfortunately, the OIG was not funded to conduct similar oversight of the \$45 billion that the EPA received from the Inflation Reduction Act. Through the Greenhouse Gas Reduction Fund, one of the IRA's signature programs, the EPA will award \$20 billion to eight nonprofit organizations known as "green banks," many of which were formed after the IRA was enacted. These recipients will use IRA funds to provide, among other things, an array of complex financial products, such as loan guarantees, credit enhancements, and equity investments. The potentially dire consequences of the lack of IRA oversight cannot be overstated. As I have stated in testimony before Congress, the EPA is directing billions of new dollars through novel programs to newly created recipients.

To oversight the ambitious effort to mobilize financing and private capital to slash greenhouse gas emissions, the OIG would need professionals focused on oversighting financial institutions, underwriting and risk management standards, and consumer financial protection.

The EPA has made clear in testimony before Congress that it sees the OIG as an indispensable partner in ensuring that IRA funds are spent appropriately and that IRA-funded programs meet statutory and regulatory requirements. The Agency's reliance on unfunded oversight is especially concerning here because the EPA has described the office responsible for managing the Greenhouse Gas Reduction Fund as having minimal viable organizational staffing. While the OIG has risen—and will continue to rise—to fulfill our mission, we have reached the limits of our funding just as the EPA has entered its period of greatest risk. We have a long-standing body of work identifying issues with how the Agency manages its annual appropriations effectively and efficiently. The danger of fraud, waste, and abuse in EPA programs and operations is greater now than ever.

As we move forward in fiscal year 2024, our goal remains to accomplish as much as possible with every oversight dollar we receive. I am immensely proud of the dedicated staff of the EPA OIG for their relentless efforts to continue doing more with less, accomplishing vital work that safeguards Americans and preserves their hard-earned taxpayer dollars. Their work has been recognized by Congress, featured in the public square, and relied upon by the Agency and others to improve human health and safety. However, we anticipate more challenges ahead, given the growing need for independent oversight and languishing funds for doing it. I implore Congress to increase the OIG's core funding in future budgets to ensure effective and independent oversight at this most crucial of times and enable us to scale our oversight with the EPA's expanded programs and operations. I also ask Congress to provide the OIG with supplemental funding to perform desperately needed oversight of the EPA's IRA work. As I testified before Congress in 2023, over the past 10 years, the funding for oversight represented approximately one-half of a penny for every dollar the EPA spent. In return, over that same period, the OIG yielded a return of over 300 percent to American taxpayers. Imagine the return on investment we could provide with funding proportionate to the enormous task before us.



Sean W. O'Donnell
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. To carry out this mission, the EPA 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. The CSB'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 Office of Inspector General is an independent office in the EPA that detects and prevents fraud, waste, and abuse to help the Agency protect human health and the environment in a more efficient and cost-effective manner. The 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. The EPA OIG has the responsibility to audit, evaluate, inspect, and investigate EPA and CSB programs and operations, as well as to review proposed laws and regulations to determine their potential impact on these programs and operations.

Our Vision

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

Our Mission

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

Our Goals

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

Our People

Our staff consists of auditors, program analysts, investigators, social scientists, and other professionals. We are based in Washington, D.C., and in a dozen other cities across the country, as shown in Figure 1. With staff throughout the United States, we can quickly begin oversight in response to environmental emergencies and can ensure continuity of operations.






Figure 1: OIG office locations



Note: DC = District of Columbia; NYC = New York City; RTP = Research Triangle Park.

Source: OIG office data. (EPA OIG image)



1.2 OIG Strategic Planning

The OIG’s strategic planning documents guide us as we design and execute audits, evaluations, and investigations. When determining which audits, evaluations, and investigations to undertake, we consider the top management and performance challenges facing the EPA and the CSB. We also 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 which top management challenges our audits and evaluations address, as applicable, next to the following symbol: . We also identify what aspect of the Agency’s mission each report addresses (); whether the work was statutorily mandated () or a follow-up project (); and whether we provide supplemental materials for each report, such as a video or podcast (.

Top Management Challenges

The Reports Consolidation Act of 2000 requires each inspector general to prepare an annual statement summarizing what the inspector general considers to be “the most serious management and performance challenges facing the agency” and to briefly assess the agency’s progress in addressing those challenges.

EPA Top Management Challenges



Report No. [24-N-0008](#) | Issued November 15, 2023 |  

For FY 2024, we identified seven top management challenges facing the EPA. We retained five of the eight challenges we identified in FY 2023, albeit with some modifications, while we revised and combined the three other FY 2023 challenges to create two new challenges.

The EPA’s FY 2024 Top Management Challenges

1. Mitigating the causes and adapting to the impacts of climate change.
2. Integrating and implementing environmental justice.
3. Safeguarding the use and disposal of chemicals.
4. Promoting ethical conduct and protecting scientific integrity.
5. Managing grants, contracts, and data systems.
6. Maximizing compliance with environmental laws and regulations.
7. Overseeing, protecting, and investing in water and wastewater systems.

CSB Top Management Challenges

Report No. [24-N-0010](#) | Issued December 6, 2023 |  

For the management challenges facing the CSB in FY 2024, we retained the three that we identified in FY 2023 and added a fourth: promoting ethical conduct.

The CSB’s FY 2024 Top Management Challenges

1. Operating effectively without a full board.
2. Minimizing mission-critical staff vacancies and attrition rates.
3. Improving cybersecurity.
4. Promoting ethical conduct.

Fiscal Year 2024 Oversight Plan

Report No. [24-N-0015](#) | Issued January 17, 2024

The *Fiscal Year 2024 Oversight Plan* describes the planned and ongoing oversight projects we intend to conduct during the fiscal year to achieve our mission, as of December 31, 2023. We outline 71 projects for oversight of the EPA and five projects for oversight of the CSB; however, our plan is subject to change based on our identification of emerging risks and new priorities. We typically accomplish our oversight mission through audits, evaluations, and investigations related to EPA and CSB programs and operations, as required by law or as we deem necessary through our planning processes.

Office of Investigations Overview and Investigative Priorities

Report No. [24-N-0016](#) | Issued January 17, 2024 | 

Our *Investigative Priorities* document describes the primary areas of focus for our Office of Investigations. We identified four investigative priorities for FY 2024: environmental infrastructure, grant fraud, program fraud, and laboratory fraud. These priorities are subject to change as new challenges and risks evolve and emerge. To identify these investigative priorities, we considered the top management and performance challenges facing the EPA and the CSB; the missions of these two agencies; the budgetary priorities set forth by Congress; observations from previous investigative work; emerging vulnerabilities in the drinking and wastewater sectors; and projects being planned or funded through the American Rescue Plan Act, the Infrastructure Investment and Jobs Act, and the Inflation Reduction Act.

Infrastructure Investment and Jobs Act Oversight Plan—Year Two

[Issued](#) April 2023 | Year Three under development

The Infrastructure Investment and Jobs Act, or IIJA, Pub. L. 117-58 (2021), provides the EPA with approximately \$60 billion for infrastructure-related purposes, including geographic programs, state and tribal assistance grants targeting clean-water initiatives, brownfields, Superfund, pollution prevention, and recycling. The EPA OIG has received IIJA funds that will allow us to perform dedicated oversight of the EPA's execution of IIJA programming for over ten years. In our *IIJA Oversight Plan—Year Two*, we built upon our inaugural [IIJA Oversight Plan](#) to guide our audits, evaluations, and oversight engagements in this semiannual reporting period, so that we provide effective oversight of EPA programs receiving or impacted by IIJA funds.

In this semiannual reporting period, as detailed in [Section 2](#) of this report, we produced an *IIJA Progress Report* that highlights our efforts to implement the *IIJA Oversight Plan*. We will continue to revise our *IIJA Oversight Plan* in response to emerging challenges, crises, and priorities.

The OIG's Fiscal Year 2024–2028 Strategic Plan

Under development

This semiannual period, we continued work on our next *Strategic Plan*. Our previous [Strategic Plan](#) covered FY 2019 through FY 2023. The new *Strategic Plan* will document our inspector general's five-year vision and the OIG's mission.

1.3 The OIG’s “Year of Fighting Fraud”

With the January 2024 issuance of our *Fiscal Year 2024 Oversight Plan and Investigative Priorities document*, we kicked off the new year with an oversight campaign dubbed the “Year of Fighting Fraud.” By partnering our annual oversight plan with a set of robust investigative priorities, we set the stage for the EPA OIG to be the premier fraud-fighting organization in the environmental and chemical safety space. Guided by the top management challenges that we identified for the EPA and CSB in FY 2024, these documents work in harmony to emphasize oversight of specific areas where American taxpayer funds are at greatest risk or where the integrity of EPA or CSB programs is significantly endangered.

In FY 2024, we continued our efforts to oversee the influx of approximately \$60 billion in supplemental appropriations under the IIJA, much of which will be distributed as grants. Inspector General Sean W. O’Donnell explained that our new campaign will be a significant driver of our IIJA oversight work: “Having spent these last two years focusing on preventing fraud, waste, and abuse in EPA programs receiving IIJA funds, it is now time for us to turn toward detecting fraud, waste, and abuse. This is why I declared 2024 our ‘Year of Fighting Fraud.’ In the next year, and beyond, we expect to dedicate significant effort to ensuring that the EPA uses its infrastructure funds efficiently and effectively.”

Beyond the environmental infrastructure realm, we are focusing our fraud-fighting capabilities on three other priorities: grant fraud, program fraud, and laboratory fraud. A significant element of our efforts to fight fraud in these areas is educating EPA stakeholders—from employees to contractors, from state and local governments to U.S. citizens—on how to detect fraud and what to do when they believe they have identified potential wrongdoing.

Fraud Alert and “Fraudcast”

In February 2024, we [issued](#) a Fraud Alert and an associated podcast, which we refer to as a “Fraudcast,” to highlight an increasingly common and costly form of cybercrime known as business email compromise. In this sophisticated scheme, criminals use fraudulent emails that appear to come from known and trusted sources to target employees of organizations, like the EPA and the CSB, that make or receive financial transactions. By impersonating representatives of trusted sources, criminals deceive employees into providing access to funds or sensitive information.

In the Fraud Alert and Fraudcast, we provide several suggestions to protect organizations from a business email compromise, including creating organizational policies for receiving new payments, employing security systems that can detect compromise attempts, using two-factor authentication to combat account compromise, and regularly training staff on cybersecurity best practices. We also refer people to the proper points of contact if they believe they have been a victim of business email compromise.

To ensure that we reached as many EPA and CSB stakeholders who may be affected by this scheme as possible, we shared this alert directly with state revolving fund managers, who serve as pass-through vehicles for EPA funds for local water improvement projects and thus oversee frequent financial

transactions. We also collaborated with the EPA Office of Grants and Debarment, which distributed the fraud alert via its public listserv that many grant recipients and applicants subscribe to.

We are committed to keeping EPA and CSB stakeholders informed concerning cyberattacks or schemes that could affect them. As we identify possible fraud mechanisms, we will continue to issue alerts and Fraudcasts as part of our fraud-fighting posture.

Fraud Awareness Briefings

During this semiannual reporting period, we also continued our proactive outreach efforts by providing 49 fraud awareness briefings to more than 3,000 attendees across the country. Specifically, our Investigations staff provided fraud awareness briefings to the Bureau of Indian Affairs 2023 Provider's Conference; the Tampa Bay Environmental Crimes Task Force; the EPA Office of Research and Development and Office of Water's Small Drinking Water Systems Webinar Series; the Iowa Water Environmental Association; the EPA's On-Scene Coordinator Readiness Training; the Oklahoma Department of Environmental Quality's Division of Water and State Revolving Fund Program; the Council of Inspectors General on Integrity and Efficiency's IJIA Working Group Data Summit; the Chicago Area Environmental Task Force; the Alaska Police Chiefs Quarterly Meeting; and the Mobile, Alabama, Environmental Crimes Task Force.

1.4 Analysis of Unimplemented Recommendations

OIG audits and evaluations provide recommendations to improve EPA or CSB programs and operations. The EPA, the CSB, and the public benefit from the implementation of these recommendations, which address a range of human health, environmental, and business issues. This semiannual period, we issued a [compendium](#) that provided an in-depth analysis of all open and unresolved recommendations issued by the OIG to the EPA. The compendium also identified high-priority open and unresolved recommendations. These critical recommendations have a high dollar value, are high visibility or high impact, or have been open and unresolved for a long time and should be addressed promptly.

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

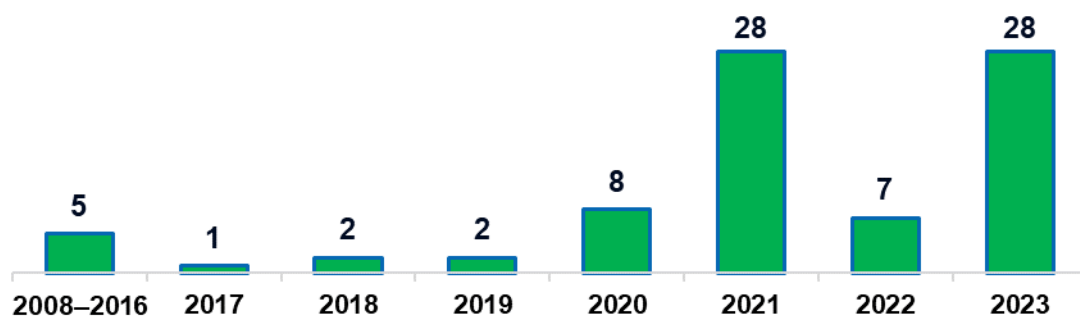
- **Unresolved.** The EPA or the CSB disagrees with the recommendation or did not provide a formal, complete written response to the recommendation, or the OIG disagrees that the Agency's proposed corrective actions are responsive to the recommendation.
- **Resolved.** The EPA or the CSB and the OIG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

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 interpret potential cost savings to be the total of questioned costs plus funds to be put to better use. For this semiannual report, we analyzed actions taken by the EPA and the CSB regarding recommendations described in past reports, and we identified those that remained unimplemented as of March 31, 2024: 81 for the EPA and zero for the CSB. Figure 2 shows when these unimplemented recommendations were originally issued to the EPA. As shown in

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.

Table 1, the potential cost savings of the 81 recommendations issued to the EPA are approximately \$74.5 million.

Figure 2: 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 | 81 | 74,507,000 |
| CSB | 0 | 0 |
| Total | 81 | 74,507,000 |

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

Table 2 breaks down the 81 unimplemented recommendations issued to the EPA according to their potential health, environmental, and business benefits and their associated potential cost savings if the EPA implements the recommendations. [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 | 16 | 46,707,000 |
| Human Health and Environmental Issues | 65 | 27,800,000 |
| Total | 81 | 74,507,000 |

Source: OIG analysis of OIG reports. (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 2022 and 2021 Consolidated Financial Statements, we determined that the “results of our tests did not disclose any instances of noncompliance with [Federal Financial Management Improvement Act of 1996] requirements, including where the Agency’s financial management systems did not substantially comply with the applicable federal accounting standard.” Accordingly, there is no information or outstanding corrective actions to report with respect to the Federal Financial Management Improvement Act of 1996.

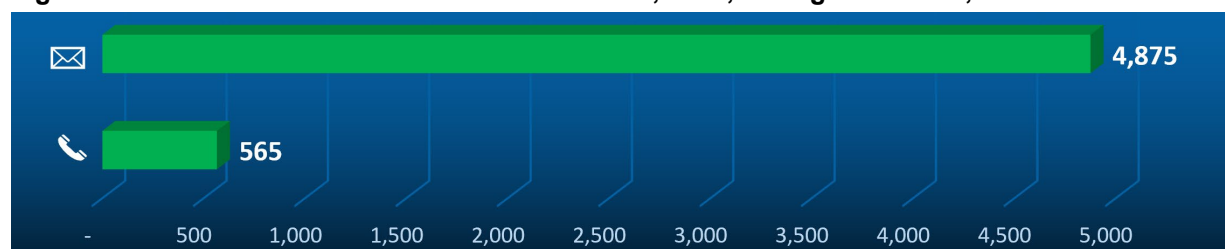
1.5 The OIG Hotline

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. The OIG also encourages 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, the OIG may conduct audits, evaluations, and investigations. In [Section 2.1](#), we summarize the work based on hotline contacts concluded during this semiannual reporting period.

Hotline Statistics

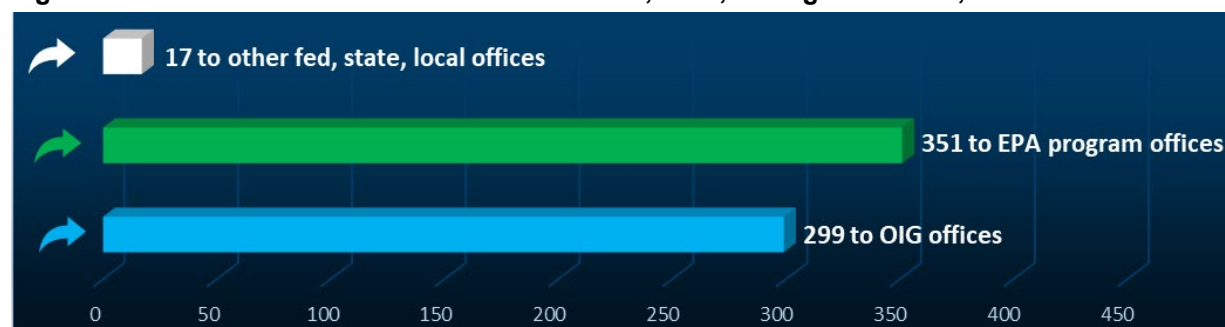
The figures below detail the number and types of contacts that the hotline received and referred for review by OIG investigation, audit, and evaluation staff; EPA program offices; and other government agencies during this semiannual period and this fiscal year. In this semiannual period, of 5,440 contacts received, the OIG made 667 referrals. A contact can be referred to more than one entity. We refer contacts unrelated to potential fraud, waste, abuse, misconduct, or mismanagement but related to an Agency program or operation to the appropriate EPA or CSB office. As applicable, we attempt to refer contacts unrelated to the EPA or the CSB to another government agency. More information about our hotline operations can be found on our [website](#).

Figure 3: Hotline contacts received from October 1, 2023, through March 31, 2024



Source: OIG Hotline data. (EPA OIG image)

Figure 4: Hotline contacts referred from October 1, 2023, through March 31, 2024



Source: OIG Hotline data. (EPA OIG image)

Figure 5: Hotline referrals to OIG offices by category from October 1, 2023, through March 31, 2024

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, the OIG encourages those who report allegations to identify themselves so that they can be contacted if the OIG has additional questions. Pursuant to the Inspector General Act, 5 U.S.C. § 407, the OIG will not disclose the identity of an EPA or CSB employee who provides information, including whistleblower disclosures, unless that employee consents or the inspector general determines that such disclosure is unavoidable during the course of an investigation. As a matter of policy, the OIG will provide comparable protection to employees of contractors, grantees, and others who make a complaint or provide information to the OIG and request confidentiality. Also pursuant to the Inspector General Act, 5 U.S.C. § 420, the OIG will not disclose the identity of an individual who provides information via the OIG's online complaint form unless the individual consents or the inspector general determines that such disclosure is unavoidable during the course of 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



**WHISTLE
BLOWING**



Want to talk about it?

To reach the EPA whistleblower protection coordinator, contact:

Email

whistleblower_protection@epa.gov

Phone

(202) 566-1513

1.6 Scientific Integrity and Misconduct

Scientific integrity at the EPA helps ensure that the science conducted, communicated, and used across the Agency is of the highest quality. Scientific integrity is crucial because it safeguards science to ensure that it is objective and rigorous. In November 2021, the OIG identified scientific integrity as a top management challenge for the EPA, and it continues to be a [top management challenge](#) for the Agency in FY 2024.

The EPA issued its *Scientific Integrity Policy* in February 2012. The policy sets the expectation for all EPA employees to represent the Agency’s scientific activities clearly, accurately, honestly, objectively, thoroughly, without political or other interference, and in a timely manner, consistent with their official responsibilities. It also sets the expectation that all EPA employees will report policy breaches. The EPA’s Scientific Integrity Program consists of the EPA’s scientific integrity official, deputy scientific integrity officials from each of the EPA’s program and regional offices, and program staff who support implementing the *Scientific Integrity Policy*.

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

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

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

To facilitate transparency, we continue our practice, started in our *Semiannual Report to Congress* in the fall of 2020, of providing a summary of scientific integrity oversight at the Agency. The following subsections report the status of scientific integrity allegations received by the scientific integrity official and scientific misconduct allegations received by the OIG.

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

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

This semiannual period, the scientific integrity official reported that the Scientific Integrity Program received one new allegation and 20 new advice queries. Also, during this semiannual period, no allegations were closed or resolved. As of March 31, 2024, there was one open allegation from this semiannual reporting period and 26 open allegations from prior reporting periods.

Scientific Misconduct Allegations Received and Investigated by the OIG

At the beginning of the semiannual period, the OIG had eight open cases involving potential scientific misconduct. The OIG received four complaints with allegations involving potential scientific misconduct from Agency employees and other sources during this semiannual period and opened two new investigations. As of March 31, 2024, two investigations were closed. The OIG had one relevant result of investigation that it conducted or oversaw to report to the Agency for a determination of appropriate action. We detail this result in [Section 2.2](#) in the “Lab Co-Owner Debarred for Reporting False Test Results” writeup in the “Open Significant Investigations” subsection.

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, “[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 the OIG receives an allegation of research misconduct, OIG staff will contact the scientific integrity official to discuss the allegation, as appropriate. As noted above, the scientific integrity official and OIG staff also meet every two weeks to discuss the status of cases, as appropriate, as well as other scientific integrity-related issues.

In FY 2022, the OIG initiated discussions with the Agency to revise the coordination procedures between the OIG and the Agency's Scientific Integrity Program related to information sharing on scientific integrity. In June 2022, the OIG presented revised coordination procedures to the Agency that would ensure that complaints involving scientific integrity, as well as other misconduct, were promptly disclosed to the OIG. In August 2023, the Agency provided revisions to the OIG's revised coordination procedures. In January 2024, the OIG met with the Agency to discuss its concerns with the Agency's revisions, including the removal of language addressing allegations of interference and censorship by senior Agency employees, as well as allegations of other employee misconduct. The OIG has agreed to provide a written overview of its concerns to the Agency.

Since the beginning of FY 2023, the OIG has had to issue monthly information requests to the Agency's Scientific Integrity Program to ensure that the OIG is receiving all relevant information on potential scientific integrity concerns. In January 2024, the Agency agreed to provide this information to the OIG 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. Revised coordination procedures are essential to clarify the OIG's 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.

1.7 Oversight Overtures: Working Together to Detect and Prevent Fraud, Waste, and Abuse

Our office aims to help the EPA achieve its mission as efficiently and effectively as possible and to prevent and detect waste, fraud, and abuse of taxpayer dollars. While independence is the cornerstone of our work, we rely upon the EPA to provide transparency and access to enable effective oversight. To that end, it is paramount that our organizations work collegially to facilitate open and honest communication. In this semiannual reporting period, the EPA OIG and the EPA took great strides to jointly foster a positive working relationship, both hosting and participating in each other's educational events intended to amplify understanding and dialogue.

OIG Participation in the EPA's Audit Summit

On October 17, 2023, the OIG participated in the EPA's first-ever Audit Summit, which was hosted by the EPA Office of the Chief Financial Officer to provide EPA management a chance to engage with and learn more about the OIG and its oversight processes.

"There are always opportunities for improvement in communication, for improvement in understanding of how we work, how our work impacts you all," then-Acting Deputy Inspector General Nicole N. Murley said in her opening remarks to the nearly 200 attendees. "Exchanges like today help us improve our products in terms of accuracy, effectiveness, relevancy, and timeliness."

As part of the event, a panel comprising two assistant inspectors general and the EPA controller answered questions about the OIG's process for audits and evaluations. The discussion emphasized the importance of communication, coordination, and transparency throughout the duration of each oversight project. The panel also helped clarify key differences between the types of reports the OIG produces, including audit reports, evaluation reports, management alerts, and lessons-learned reports.

EPA Participation in the OIG's Winter Symposium

For the OIG's second annual symposium, which was held from December 4 through December 6, 2023, at OIG headquarters with virtual participation by the OIG regions, we invited EPA officials from across the organization to provide their insight into not only the Agency's past, present, and future initiatives but also how it is structured to carry out its responsibilities. The vision was for OIG staff to become more familiar with the organization we are tasked with overseeing and to then use that knowledge to effect meaningful change via our audits, evaluations, and investigations.

From the EPA chief of staff to representatives from various Agency program offices, the OIG learned about the EPA's history up through its most recent program priorities, including its IJIA- and IRA-funded initiatives. In breakout sessions held over the course of the symposium, EPA staff delved into specific topics related to our oversight projects. For example, we learned about the preaward and postaward oversight work the Office of Grants and Debarment conducts to administer grants, as well as the Pesticide Program's initiatives to comply with the Endangered Species Act, implement the Endocrine

Disruptor Screening Program, and regulate pet collars. The Office of Water provided unique insights into requirements in the American Iron and Steel Act and Buy America, Build America Act. We learned about the Environmental Justice program’s comprehensive community support program, while the Office of Land and Emergency Management discussed the various environmental laws and regulations related to Superfund, and the Office of Homeland Security detailed the cybersecurity and physical-security landscapes of the water and wastewater sectors.

Both of these events—the EPA’s Audit Summit and the OIG’s Winter Symposium—helped strengthen the foundation for meaningful and effective professional relationships and information sharing to aid our fight against fraud, waste, and abuse.

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.

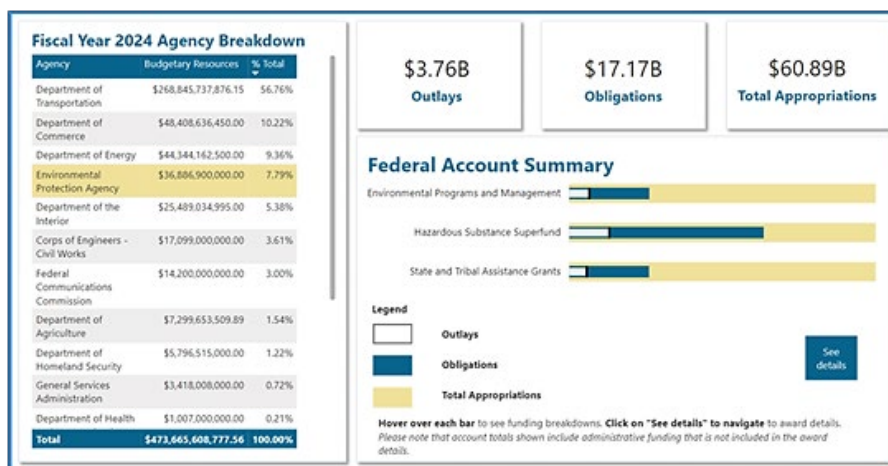
Infrastructure Investment and Jobs Act

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 [webpage](#), “EPA OIG Infrastructure Investment and Jobs Act Oversight.” The webpage features our EPA IIJA spending dashboard, links to our *IIJA Oversight Plan* and *IIJA Progress Reports*, and lists our ongoing and completed infrastructure oversight work.

Infrastructure Investment and Jobs Act Progress Report—Year Two

Report No. [24-N-0026](#) | Issued March 7, 2024

Our Year Two progress report provides an overview of the IIJA oversight work that we completed from early 2023 through January 31, 2024, which focused on grants management, clean school bus funding, and unspent obligations for programs receiving IIJA funds. As of January 31, 2024, we had 19 IIJA projects ongoing and ten in the planning phase. Also, we updated our IIJA oversight [webpage](#) in August 2023 to allow users to view IIJA funding by program and location receiving the funds, as well as the status of our planned, ongoing, and completed IIJA oversight projects.



Screen image of the IIJA spending dashboard as of February 5, 2024. (EPA OIG image)

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 October 1, 2023 | 3 |
| Cases opened during period | 3 |
| Cases closed during period | 2 |
| Cases open as of March 31, 2024 | 4 |

Source: OIG investigations. (EPA OIG table)


Management Implication Report: Preventing Fraud, Waste, and Abuse Within the EPA’s Clean School Bus Program

Report No. [24-N-0013](#) | Issued December 27, 2023


The EPA did not have robust verification mechanisms within the Clean School Bus rebate and grant application process, which led to third parties submitting applications on behalf of unwitting school districts, applicants not being forthright or transparent, entities self-certifying applications without corroborating documentation, and entities being awarded funds despite violating program requirements. We did not issue any recommendations in this report, but we provided several measures for improvement for the Agency’s consideration, including requiring applicants to provide supporting documentation, establishing an application-validation regimen, requiring rebate and grant recipients to maintain a documentation archive, highlighting criminal penalties in the application process, requiring signed and notarized attestations and certifications, and increasing oversight of third-party vendors.

IIJA Audit and Evaluation Work

The EPA Clean School Bus Program Could Be Impacted by Utility Delays

Report No. [24-P-0012](#) | Issued December 27, 2023 | 

 Improving air quality; Operating efficiently and effectively.

 Managing grants, contracts, and data systems.

There were no significant supply chain issues or production delays that impacted the EPA’s efforts to disburse funds through the first round of the Clean School Bus Program’s funding in 2022. However, local utility companies may have trouble meeting increasing power demands for electric school buses. For example, there could be delays in constructing charging stations to make the buses fully operational. The EPA suggested, but did not require, that applicants to the funding program coordinate with their local utility provider regarding power supply demands. We did not issue any recommendations in this report.




Clean school bus at charging station. (EPA photo)

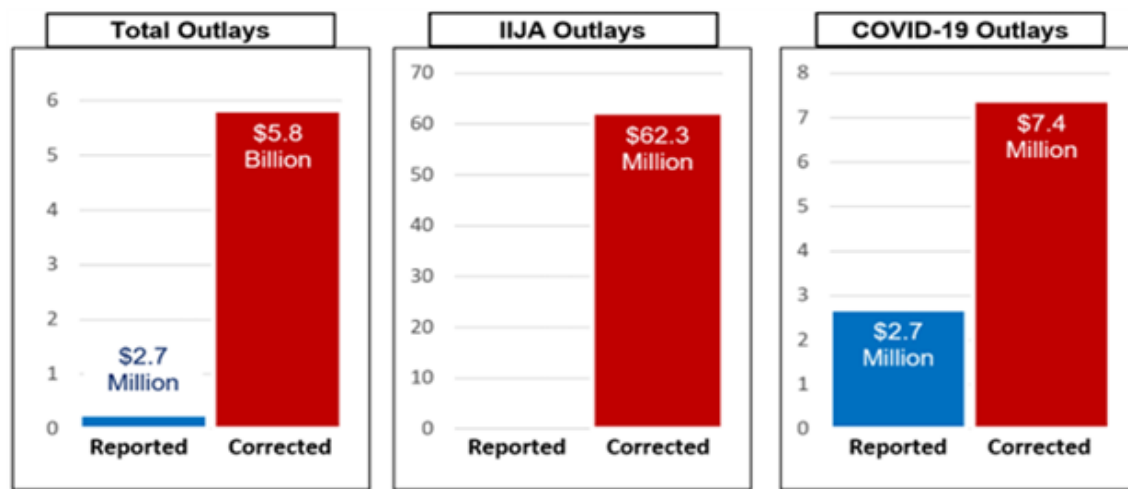
The EPA Needs to Improve the Completeness and Accuracy of the Obligation and Outlay Information That It Reports in USAspending.gov

Report No. [24-P-0014](#) | Issued January 9, 2024 | 

 Compliance with the law; Operating efficiently and effectively.

 Managing grants, contracts, and data systems.

The EPA's initial reporting of its FY 2022 spending in USAspending.gov was not complete or accurate. Spending encompasses both obligations, which are promises made by the government to spend money, and outlays, which are money actually paid. Because the Office of the Chief Financial Officer did not follow its information technology configuration management procedures and did not have procedures to detect errors in the reported data for FY 2022, the EPA underreported its award-level obligations by \$1.2 billion, underreported its award-level outlays by \$5.8 billion, did not report any of its IJJA outlays, and underreported its coronavirus pandemic-related outlays. Taxpayers were thus initially misinformed about the EPA's spending, and policy-makers may have been unable to effectively track federal spending. As a result of our audit, the EPA corrected its FY 2022 reporting in May 2023 and made the necessary configuration changes in June 2023.




The EPA's reported and corrected FY 2022 award-level outlays in USAspending.gov. Source: OIG analysis of the EPA's USAspending.gov reporting. (EPA OIG image)

Recommendations issued to the chief financial officer

| No. | Recommendation |
|-----|---|
| 1 | Update, circulate, and implement the Office of the Chief Financial Officer's standard operating procedures related to configuration management to describe the process and frequency of configuration audits related to its systems. |
| 2 | Conduct periodic configuration audits of the DATA Act Evaluation and Approval Repository, as well as any other Office of the Chief Financial Officer systems that have not had periodic configuration audits, to determine whether all configuration changes were properly implemented, documented, and approved. |
| 3 | Update, circulate, and implement the Office of the Chief Financial Officer's standard operating procedures to include procedures to prevent and detect errors and confirm the accuracy and completeness of the EPA's Digital Accountability and Transparency Act of 2014 reporting. |
| 4 | Develop and conduct training on the requirements of the Office of the Chief Financial Officer's standard operating procedures for configuration management and Digital Accountability and Transparency Act of 2014 reporting. |
| 5 | Evaluate the manual process used to transfer data from the DATA Act Evaluation and Approval Repository to the DATA Act Broker and determine how to reduce vulnerabilities by streamlining or automating the process. Based on the results of the evaluation, update the standard operating procedures. |

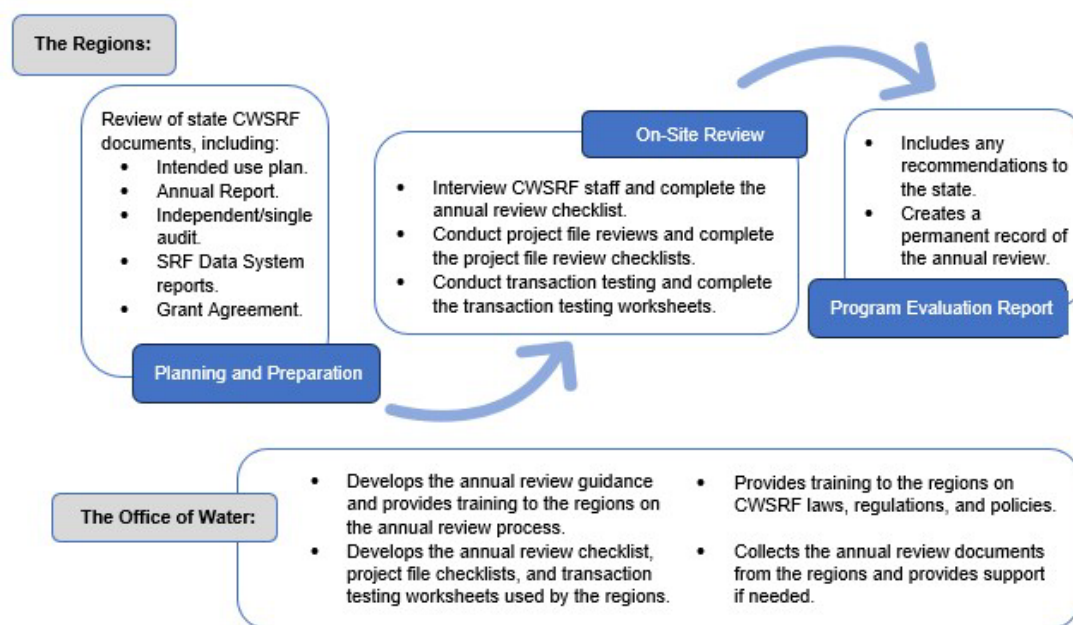
The EPA Should Improve Annual Reviews to Protect Infrastructure Investment and Jobs Act Grants to Clean Water State Revolving Funds

Report No. [24-P-0028](#) | Issued March 14, 2024

 Ensuring clean and safe water.

 Managing grants, contracts, and data systems.

Although the Clean Water Act requires the EPA to conduct an annual oversight review of each state's Clean Water State Revolving Fund, the Office of Water did not consistently monitor the performance or results of the annual reviews for any of the three states that we reviewed—New York, which is in EPA Region 2; Pennsylvania, which is in EPA Region 3; and Texas, which is in EPA Region 6—in the time period we examined. Furthermore, the Office of Water did not ensure that Regions 2, 3, and 6 followed the annual review guidance; did not review all supporting checklists and program evaluation reports; and did not act in a timely manner to address the risk of a substantial and potentially excessive fee account balance that Region 6 identified during the annual review process. In addition, of the three states that we reviewed, we concluded that none had audits conducted for their Clean Water State Revolving Funds in state FYs 2019 through 2021 that met regulatory requirements.



The EPA's annual review process. Notes: CWSRF = Clean Water State Revolving Fund; SRF = State Revolving Fund. Source: OIG depiction based on the *SRF Annual Review Guidance*. (EPA OIG figure)


Recommendations issued to the assistant administrator for Water

| No. | Recommendation |
|-----|---|
| 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 |
| 2 | Create a program evaluation report template and implement procedures to ensure that regions present results in a consistent format. |
| 3 | Coordinate with Region 6 to implement a resolution plan for the Texas Water Development Board's \$106 million in its origination fees account and ensure that the water board is evaluating its need for Clean Water State Revolving Fund fees appropriately. |

| No. | Recommendation |
|-----|---|
| 4 | Clarify annual review guidance regarding fee accounts and collect data on states' fee account balances through the annual review process. |
| 5 | In coordination with the associate administrator for Policy, update EPA regulations implementing the Clean Water State Revolving Fund audit requirement at 33 U.S.C. § 1386(b) to clearly articulate requirements and current EPA expectations regarding audits of state revolving funds. |
| 6 | Ensure annual review guidance regarding implementation of audit requirements is consistent with 33 U.S.C. § 1386(b) and 40 C.F.R. § 35.3165. |

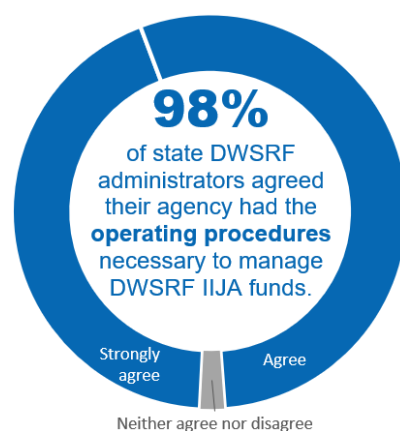
Perspectives on Capacity: Managing Drinking Water State Revolving Fund Infrastructure Investment and Jobs Act Funding

Report No. [24-E-0022](#) | Issued February 27, 2024

 Ensuring clean and safe water.

 Overseeing, protecting, and investing in water and wastewater systems; Managing grants, contracts, and data systems.

In response to an OIG survey, most state Drinking Water State Revolving Fund, or DWSRF, administrators agreed that their agencies had the organizational capacity necessary to manage the DWSRF Infrastructure Investment and Jobs Act funds awarded to their states. However, a few state DWSRF administrators expressed concerns related to financial capacity, workforce management, and insufficient federal guidance. State DWSRF agency capacity to effectively manage federal DWSRF grants is crucial to the success of the DWSRF Program. Obstacles that affect state DWSRF agency capacity may result in decreased investment in critical water infrastructure projects. While we did not issue any recommendations in this report, the EPA has an opportunity to work with state DWSRF agencies to address the obstacles documented in the report.





Source: OIG analysis of the survey results. (EPA OIG image)

Human Health and Environmental Issues

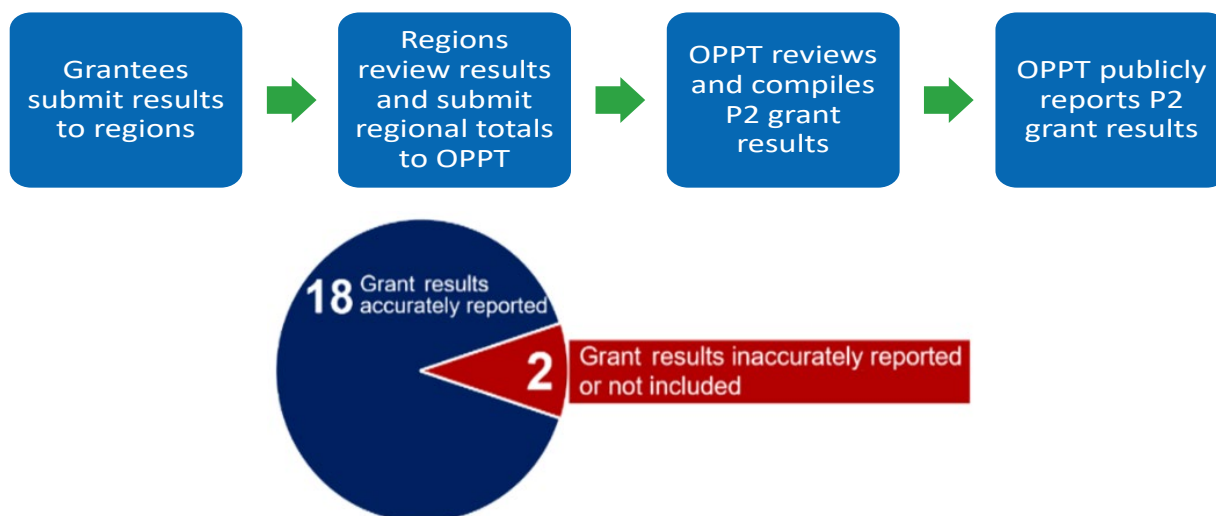
The EPA's Pollution Prevention Grant Results Aligned with Program Goals, but a Supervisory Verification Process Is Needed

Report No. [24-P-0004](#) | Issued October 19, 2023

 Operating efficiently and effectively.

 Mitigating the causes and adapting to the impacts of climate change.

The EPA environmental results and monetary benefits of all 20 pollution prevention grants that we reviewed aligned with the goals of the pollution prevention program: conserve natural resources, decrease releases of toxics to the environment, and increase cost savings for businesses and others. The EPA accurately reported results for 18 of the 20 grants but did not include the results or inaccurately reported the results for the other two. Without a process for supervisors to verify the reported grant results, the program may report inaccurate pollution prevention grant results to the public.



Above: The grant results quality assurance review process steps. *Below:* The number of grant results the EPA did or did not accurately report in sample.

Notes: OPPT = Office of Office of Pollution Prevention and Toxics; P2 = Pollution Prevention.

Source: OIG depiction of grant results review and results reported in sample. (EPA OIG images)

Recommendation issued to the assistant administrator for the Office of Chemical Safety and Pollution Prevention

| No. | Recommendation |
|-----|---|
| 1 | Establish guidance for a process in which the supervisors in the Office of Pollution Prevention and Toxics verify the accuracy of their staff's quality assurance review work prior to publishing pollution prevention grant results. |

Business Practices and Accountability

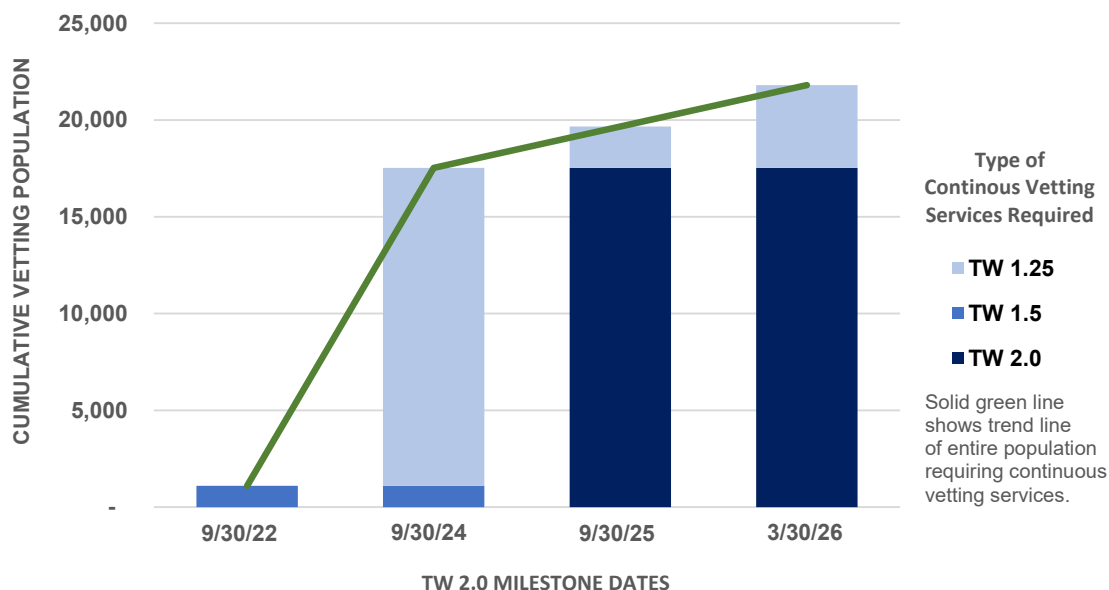
The EPA's Enhanced Personnel Security Program Is on Track, but Challenges to Full Implementation Remain

Report No. [24-E-0020](#) | Issued February 8, 2024

 Compliance with the law; Operating efficiently and effectively.

 Managing grants, contracts, and data systems.

As of October 2023, the EPA's Personnel Security Branch had successfully met all milestones and requirements to date and was on track to meet the March 2026 deadline to fully implement the director of National Intelligence's enhanced personnel security program. This program provides a continuous vetting environment that allows risks to personnel security to be tracked in real time. The Personnel Security Branch must ensure, however, that it has sufficient capacity by March 2026 to provide the required level of continuous vetting services for all EPA employees and applicable contractor personnel—nearly 22,000 individuals, or 20 times the number being vetted under the program as of October 2023. If the Personnel Security Branch plans now to achieve the needed capacity, it will prevent delays in full implementation and reduce national security risks.



The EPA's anticipated continuous vetting population growth by milestone date. *Note:* TW = Trusted Workforce Program. Source: Anticipated TW 2.0 enrollment milestones, based on EPA employee data provided by the Personnel Security Branch on August 25, 2023. (EPA OIG image)


Recommendation issued to the assistant administrator for Mission Support

| No. | Recommendation |
|-----|---|
| 1 | Develop a plan for how the Personnel Security Branch will achieve the capacity necessary to meet the requirements of full Trusted Workforce 2.0 implementation. |

The Office of Criminal Enforcement, Forensics and Training Incorporated Essential Discovery Elements into Its Policies and Procedures, but Additional Training Could Improve Awareness

Report No. [24-E-0021](#) | Issued February 15, 2024

 Compliance with law; Operating efficiently and effectively.

 Maximizing compliance with environmental laws and regulations.

We did not identify any specific circumstances where the EPA Office of Criminal Enforcement, Forensics and Training did not adhere to criminal discovery requirements regarding the collection, retention, and production of material. The office has incorporated essential elements of discovery obligations, such as the *Brady* Doctrine, the Jencks Act, and the *Federal Rules of Criminal Procedure*, into its criminal investigations policies and procedures to facilitate required discovery disclosures. Some special agents employed investigative procedures that deviated from the office's procedures, but they did not violate discovery requirements. Strengthening adherence to EPA discovery policies and procedures can promote efficient and effective criminal prosecution.

Recommendations issued to the assistant administrator for Enforcement and Compliance Assurance

| No. | Recommendation |
|-----|---|
| 1 | Review Office of Criminal Enforcement, Forensics and Training policies and procedures to determine whether updates are needed to improve processes, including best practices. |
| 2 | Provide periodic training to EPA employees that may serve on a prosecution team to promote awareness and adherence to discovery requirements and investigative policies and procedures. |

Management Implication Report: The EPA Has Insufficient Internal Controls for Detection and Prevention of Procurement Collusion


Report No. [24-N-0027](#) | Issued March 12, 2024

The Agency does not store and organize procurement data in the EPA Acquisition System in a manner that would allow for proactive oversight and program management that could detect and prevent fraudulent, collusive behavior, such as bid rigging, price fixing, or other anticompetitive practices. Over 3,500 competitively bid, negotiated contracts worth over \$2 billion for goods and services that the Office of Acquisition Solutions has awarded since FY 2017 could have been susceptible to procurement collusion because of a lack of internal controls within the EPA Acquisition System. Billions more in future procurement awards, including from IIJA and IRA funding, could also be susceptible if the Agency does not take action to improve its internal controls. We did not issue any recommendations in this report, but provided considerations for strengthening the EPA's internal controls, such as more robust training and using settings in the EPA Acquisition System to gather structured bid data from vendor proposals.

The EPA Needs to Better Implement Internal Access Control Procedures for Its Integrated Risk Information System Database

Report No. [24-P-0005](#) | Issued October 31, 2023

 Compliance with the law; operating efficiently and effectively.

 Protecting EPA systems and other critical infrastructure against cyberthreats.

Information technology access management for the EPA's Integrated Risk Information System database did not adhere to federal and Agency IT access control requirements because the Agency did not regularly review or monitor privileged or application user accounts. It also did not ensure compliance with federal security documentation requirements. Without enforcing established access control requirements, the EPA puts the chemical data, which Integrated Risk Information System users rely upon to inform scientifically sound environmental regulations and policies, at risk of unauthorized changes.

System security plan

A formal document that provides an overview of the security requirements for an information system and describes the security controls in place or planned for meeting those requirements.

Recommendations issued to the assistant administrator for Research and Development


| No. | Recommendation |
|-----|---|
| 1 | Develop a process and assign responsibility for periodic review of application user information technology access for the Integrated Risk Information System database and perform the necessary updates to adhere to federal and Agency information technology access controls requirements including identifying and deactivating any unused accounts. |
| 2 | Develop a process and assign responsibility for application user information technology access approval to the Integrated Risk Information System database. |
| 3 | Instruct staff responsible for Integrated Risk Information System account management of the federal and Agency information technology access control requirements related to access approval, review, monitoring, and removal. |
| 4 | Discontinue use of Integrated Risk Information System Database Application accounts for database administration activities without a business justification or develop a process to track privileged user activity on these accounts. |
| 7 | Work with the Office of Mission Support to incorporate the Integrated Risk Information System database into the National Computer Center's Hosting System's security plan. |


Recommendations issued to the assistant administrator for Mission Support

| No. | Recommendation |
|-----|---|
| 5 | Configure password settings to comply with Agency access control requirements for the password expiration, password reuse maximum, and inactive account time password settings. |
| 6 | Document the Integrated Risk Information System database's security controls, including password configuration settings, in a system security plan and work with the Office of Information Technology Operations to confirm those settings are reviewed as part of its annual security plan review process. |

Lack of Vulnerability Remediation for Weaknesses Identified Within the Central Data Exchange System Increases the Risk of Cyberattacks

Report No. [24-N-0024](#) | Issued March 5, 2024


 Operating efficiently and effectively.


 Managing grants, contracts, and data systems.

During our [ongoing audit](#) of the EPA's Central Data Exchange Access security controls, we identified that the EPA did not mitigate significant vulnerabilities found in the Central Data Exchange system, which could increase the risk of threat actors gaining unauthorized access to CDX and other connected program services. As of August 2023, two high-risk and 12 moderate-risk vulnerabilities remain unresolved. The EPA also did not follow its own procedures by not reviewing and updating plans of actions and milestones regularly; making sure all planned, in-process, and completed actions are recorded; and providing support that it had implemented adequate mitigating or compensating controls. The Agency also closed, without having appropriate supporting security documentation, a Plan of Action and Milestones that documented a vulnerability and did not review security documentation submitted for closure. We did not issue any recommendations in this report.

Central Data Exchange System Identity Data Are Unreliable



Report No. [24-N-0025](#) | Issued March 5, 2024


 Operating efficiently and effectively.

 Managing grants, contracts, and data systems.

During our [ongoing audit](#) of the EPA's Central Data Exchange Access security controls, we identified instances of unreliable data in Central Data Exchange files that met neither the EPA quality and integrity requirements in effect during our project scope nor the National Institute of Standards and Technology's quality and integrity guidance. We issued this management alert while our overall audit work continued to immediately inform the EPA of these issues. If the EPA does not mitigate these issues, it cannot provide assurance that its environmental data are accurate and reliable, and its ability to fulfill its mission and carry out its regulatory obligations may be impacted. We did not issue any recommendations in this management alert.

Audit of the EPA's Fiscal Years 2021 and 2020 Toxic Substances Control Act Service Fee Fund Financial Statements

Report No. [24-F-0002](#) | Issued October 12, 2023 |  

 Operating efficiently and effectively.

We rendered a qualified opinion on the EPA's FYs 2021 and 2020 Toxic Substances Control Act Service Fee Fund financial statements, meaning that the statements were fairly presented except for material errors in expenses and income from other appropriations. The EPA materially overstated the FY 2021 "Expenses from Other Appropriations" line item by \$2.36 million and did not implement controls to properly record accounts receivable and ensure segregation of duties between payment processing and payment approval.


Recommendations issued to the chief financial officer


| No. | Recommendation |
|-----|--|
| 1 | Correct the calculation in the Toxic Substances Control Act 21-09A on-top adjustment to accurately capture the amounts for financial statement line items "Income from Other Appropriations" and "Expenses from Other Appropriations." |
| 3 | Implement procedures to establish an allowance for doubtful accounts for the Toxic Substances Control Act Service Fee Fund to reduce that fund's accounts receivable to its net realizable value. |
| 4 | Implement procedures to prevent or detect potential violations of the segregation of duties policy in the Small Purchase Information Tracking System software. |

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

| No. | Recommendation |
|-----|--|
| 2 | Update the Toxic Substances Control Act standard operating procedures to align with the Resource Management Directive System requirement to forward documentation that establishes a receivable to the Office of the Controller within five business days. |

Audit of the EPA's Fiscal Years 2023 and 2022 (Restated) Consolidated Financial Statements

Report No. [24-F-0009](#) | Issued November 15, 2023 | 

 Operating efficiently and effectively.

We rendered an unmodified opinion on the EPA's consolidated financial statements for FYs 2023 and 2022 (restated), meaning that they were fairly presented and free of material misstatement. We noted four significant deficiencies, including that the EPA did not provide accurate information for its revenue accruals; did not deobligate unneeded funds in a timely manner; operated under an expired interconnection Security Agreement and Memorandum of Agreement, which could hamper invoice processing; and did not review user accounts for EPA contracting personnel every 60 days, as required by its information security procedure. We did not note any significant noncompliance with laws, regulations, contracts, and grant agreements.

Recommendations issued to the chief financial officer

| No. | Recommendation |
|-----|---|
| 1 | Instruct the regions to perform an analysis of financially closed Superfund State Contracts to reclassify appropriated and reimbursable disbursements and financially close lines on the accrual. |
| 2 | Instruct the regions to provide current Superfund State Contract information quarterly to the Cincinnati Finance Center. |


| No. | Recommendation |
|-----|---|
| 4 | Develop a plan to improve the Office of the Chief Financial Officer processes for headquarters program offices and regional offices to deobligate unneeded funds in a timely manner by the end of the fiscal year, as required. |
| 5 | Develop and implement a plan with milestones to ensure that future Interconnection Security Agreement and Memorandum of Agreement documents for each external connection with Office of the Chief Financial Officer systems are reauthorized before the current agreements expire. |
| 6 | In consultation with the Office of Mission Support's chief information officer, determine how the Office of the Chief Financial Officer will conduct reviews of active Invoice Processing Platform user accounts to comply with Chief Information Officer Directive No. CIO 2150-P-01.3, <i>Information Security – Access Control Procedure</i> . |
| 7 | Develop and implement a strategy to ensure that future reviews of active Invoice Processing Platform user accounts comply with Chief Information Officer Directive No. CIO 2150-P-01.3, <i>Information Security – Access Control Procedure</i> . |

Recommendation issued to the director of the Great Lakes National Program Office

| No. | Recommendation |
|-----|--|
| 3 | Review the Great Lakes Legacy Act accrual project information prior to its submission to the Cincinnati Finance Center to ensure its accuracy. |

Audit of the EPA's Fiscal Years 2022 and 2021 (Restated) Pesticides Reregistration and Expedited Processing Fund Financial Statements

Report No. [24-F-0003](#) | Issued October 17, 2023 | 

 Operating efficiently and effectively.


We rendered an unmodified opinion on the EPA's FYs 2022 and 2021 (restated) Pesticides Reregistration and Expedited Processing Fund, also known as the Federal Insecticide, Fungicide, and Rodenticide Act Fund, financial statements, meaning that the statements were fairly presented and free of material misstatement. However, we noted one material weakness: the EPA did not allocate expenses totaling approximately \$1.2 million to the fund that it paid to the U.S. General Services Administration and the U.S. Department of Homeland Security. We noted one significant deficiency, which is an internal control deficiency that is less severe than a material weakness but still important enough to merit attention: the EPA miscalculated the restatement balances for Software in Development for the financial statements note 15, "Restatements," overstating the balance by \$66,622. We did not identify any noncompliance with applicable laws, regulations, contracts, and grant agreements that would result in a material misstatement to the audited financial statements. In addition, the Agency was in compliance with the statutory performance measures.

Recommendations issued to the chief financial officer

| No. | Recommendation |
|-----|---|
| 1 | Record an adjustment to recognize rent and federal protective services expenses for the fiscal year 2022 Federal Insecticide, Fungicide, and Rodenticide Act Fund financial statements. |
| 2 | Correct the restatement amount for the Software in Development to accurately capture the amounts for note 15, "Restatements." |

Audit of the EPA's Fiscal Years 2022 and 2021 (Restated) Pesticide Registration Fund Financial Statements

Report No. [24-F-0017](#) | Issued January 18, 2024 | 


 Operating efficiently and effectively.

We rendered an unmodified opinion on the EPA's FYs 2022 and 2021 (restated) Pesticide Registration Fund—also known as the Pesticide Registration Improvement Act Fund—financial statements, meaning that the statements were fairly presented and free of material misstatement. We noted the following significant deficiency: the EPA miscalculated the restatement balances for Software in Development Fund financial statements note 13, "Restatement," overstating the balance by \$938,948.35. We did not identify any noncompliance that would result in a material misstatement to the audited financial statements. In addition, the Agency was in compliance with the statutory decision time review periods.

Recommendation issued to the chief financial officer


| No. | Recommendation |
|-----|--|
| 1 | Correct the restatement amount for Software in Development to accurately capture the amounts for note 13, "Restatement." |

OIG Report to the Office of Management and Budget on the EPA's and CSB's Implementation of Recommendations Related to Purchase and Travel Card Programs

Report No. [24-N-0018](#) | Issued January 31, 2024 | 

We report to the director of the Office of Management and Budget on Agency implementation of recommendations that address audit findings related to purchase and travel card programs. In this letter to the Office of Management and Budget regarding FY 2023 purchase and travel card audits and recommendations, we reported that we did not perform purchase or travel card program audits, reviews, or assessments for the EPA; that we did not perform a travel card program audit or review for the CSB; that we did perform a purchase card program audit for the CSB and the CSB addressed those findings and recommendations; and that the EPA completed a corrective action that addressed the one outstanding OIG recommendation from our prior travel card program audits, reviews, or assessments.

OIG Report to the Office of Management and Budget on the EPA's Semi-Annual Report on Purchase Charge Card Violations


Report No. [24-N-0019](#) | Issued January 31, 2024 | 


The EPA and the inspector general are required to submit to the director of the Office of Management and Budget, on a semiannual basis, a joint report on Agency purchase card violations. The EPA reported no purchase card violations from April 1, 2023, to September 30, 2023. For this reporting period, no information inconsistent with the EPA's violation report came to our attention, and we received no allegations of misuse of the government purchase card.

Hotline Complaints

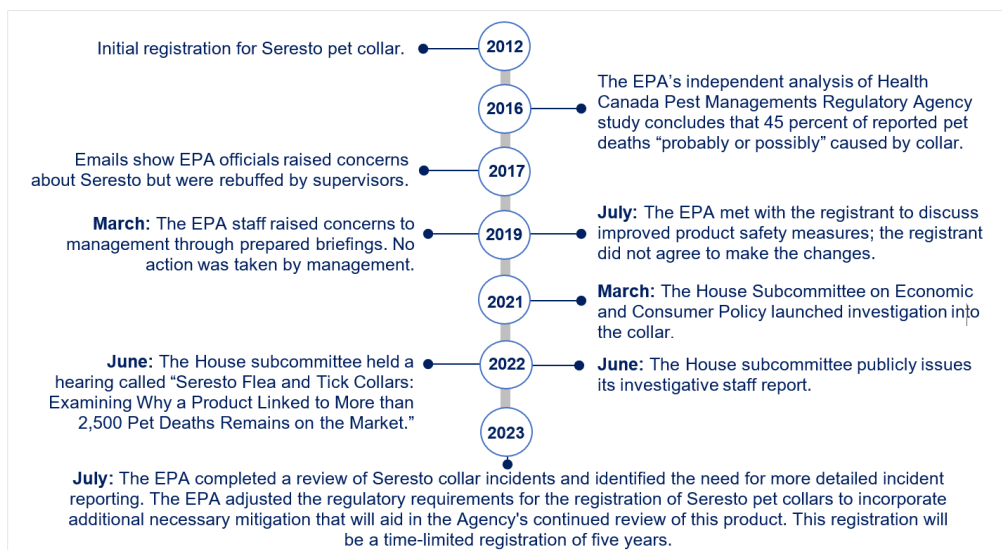
The EPA Needs to Determine Whether Seresto Pet Collars Pose an Unreasonable Risk to Pet Health

Report No. [24-E-0023](#) | Issued February 29, 2024 | 

 Ensuring the safety of chemicals.

 Safeguarding the use and disposal of chemicals.

The EPA's response to reported pesticide incidents involving Seresto pet collars has not provided assurance that they can be used without posing unreasonable adverse effects to the environment, including pets. While the EPA adhered to the toxicological data requirements in 40 C.F.R. part 158 in its initial approval of Seresto pet collars, it has not adhered to the pesticide registration review process for the active ingredients flumethrin and imidacloprid in the Seresto pet collars. Additionally, it did not conduct or publish domestic animal risk assessments, which it had committed to doing in the work plans for these two pesticides; continues to use an inadequate 1998 companion animal safety study (Guideline 870.7200); and lacks standard operating procedures and a measurable standard to help determine when domestic animal pesticide products pose unreasonable adverse effects to the environment, as required by the Federal Insecticide, Fungicide, and Rodenticide Act. Additionally, the EPA's Pesticide Incident Reporting System and reporting process do not capture adequate data that the EPA needs to assess unreasonable adverse effects of pet products.



Seresto pet collar timeline. Source: OIG analysis of EPA information. (EPA OIG image)


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


| No. | Recommendation |
|-----|--|
| 1 | Issue amended proposed interim registration review decisions for both flumethrin and imidacloprid that include domestic animal risk assessments for the two pesticides, written determinations on whether the Seresto pet collar poses unreasonable adverse effects in pets, and an explanation of how the Office of Pesticide Programs came to its determinations. Allow for public comment by placing these documents in the applicable registration review dockets. |
| 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. |

| No. | Recommendation |
|-----|---|
| 3 | Implement a measurable standard to determine when a pet product poses unreasonable adverse effects in pets to support the pesticide registration review decision. |
| 4 | Update the EPA's Guideline 870.7200, <i>Companion Animal Safety</i> , as necessary, to be consistent with the Veterinary International Conference on Harmonization Guideline GL43, <i>Target Animal Safety for Veterinary Pharmaceutical Products</i> . |
| 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> . |
| 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. |
| 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. |
| 8 | Update the EPA's Incident Data System to capture the additional data that the EPA identifies from the recommendations above to allow the EPA to adequately assess incident reports and make timely decisions on when to take action. |

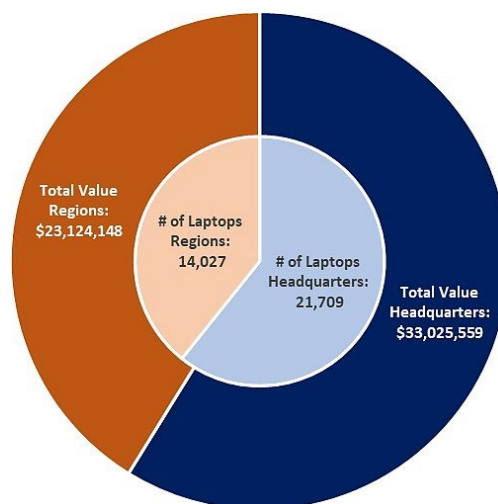
The EPA Took Additional Actions to Strengthen Controls to Account for and Secure Laptops

Report No. [24-P-0011](#) | Issued December 14, 2023

 Operating efficiently and effectively.

 Managing grants, contracts, and data systems.


EPA Regions 4 and 6 and the Desktop Support Services Division in EPA headquarters took actions to comply with the Agency's *Personal Property Manual* and have sufficient controls to account for and secure laptops to prevent theft and misplacement. Region 6's business practices had a flaw which could have made it difficult to account for new laptops received. However, the region took immediate action to fix this issue because of our audit. Also, Region 6 and the Desktop Support Services Division updated their operating procedures for personal property management once we found that their procedures were not fully developed or approved by the agency property management officer. We did not issue any recommendations in this report.




Source: OIG analysis of laptops from the Agency asset management system. (EPA OIG image)

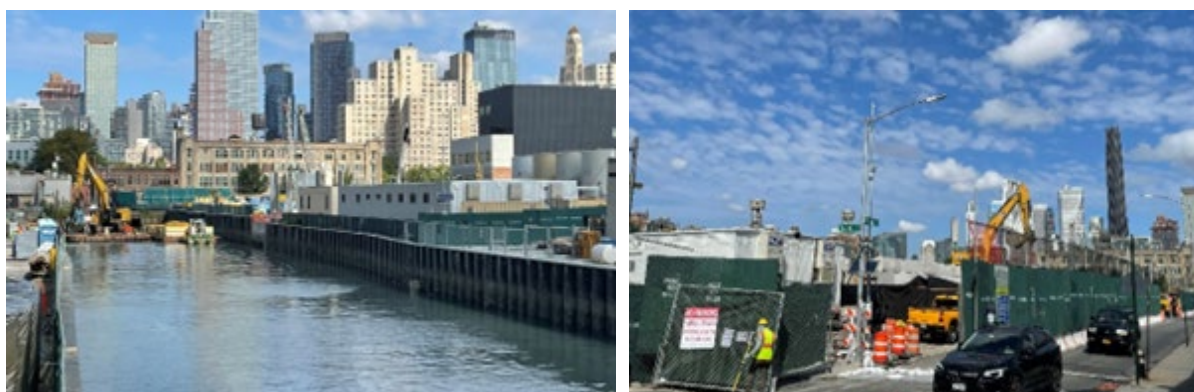
Multiple Factors Contributed to the Delay in Constructing Combined Sewer Overflow Tanks at the Gowanus Canal Superfund Site in New York City

Report No. [24-P-0029](#) | Issued March 21, 2024 | 

 Cleaning up and revitalizing land.

 Maximizing compliance with environmental laws and regulations.

Construction of the two combined sewer overflow tanks for the Gowanus Canal Superfund site in New York City is approximately six-and-a-half years behind Region 2's original schedule and is estimated to cost more than \$1 billion—a more than 1,300-percent increase from Region 2's original estimate. A 2021 administrative order adjusted the project schedule so that the Owls Head tank will be completed by May 1, 2028, and the Red Hook tank will be completed by March 31, 2029. Continued delays can prolong exposure to contaminants in the canal and lead to further cost increases.




Red Hook tank construction site viewed from the Gowanus Canal (at left) and Red Hook tank construction site viewed from Nevins Street (at right). Source: EPA OIG site visit. (EPA OIG images)


Recommendations issued to the assistant administrator for Water

| No. | Recommendation |
|-----|--|
| 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. |

U.S. Chemical Safety and Hazard Investigation Board

The CSB Needs to Improve Controls over Its Charge Card Program and Comply with Federal Requirements

Report No. [24-P-0001](#) | Issued October 4, 2023 | 

 Creating and maintaining an engaged, high-performing workforce.

We determined that the CSB's risk for illegal, improper, or erroneous purchases and payments is low. However, even though the CSB is ultimately responsible for overseeing its charge card program and for following the requirements of Appendix B to OMB Circular A-123, it relied on its interagency agreement with the U.S. Department of the Treasury's Bureau of the Fiscal Service to manage various aspects of its charge card program. Additionally, the CSB used verbal communication and institutional knowledge to manage other aspects of its charge card program. We identified that in FY 2022, the CSB did not adequately address the required elements in its charge card management plan and risk profile; did not have guidance regarding third-party payment providers; did not monitor whether staff completed all required training in a timely manner; and did not provide staff with written guidance addressing charge card sales tax. As a result, if the CSB does not improve its efforts to meet the requirements outlined in Appendix B to OMB Circular A-123, deficiencies in its charge card program could increase its risk for unauthorized purchases and improper payments.

Summary of the OIG's risk assessment results for the CSB charge card program

| Assessment risk factors | Risk rating |
|---|-------------|
| Program size: Percentage of agency's budgetary resources | Low |
| Unauthorized and erroneous purchases | Low |
| Noncompliance with charge card requirements | Medium |
| Training certificate issues | Medium |
| Improper delegation of authority | Low |
| Incomplete or insufficient charge card management plan and risk profile | Medium |
| Summary risk assessment (average) | Low* |

Source: OIG analysis of risk assessment factors. (EPA OIG table)


* We did not identify any unauthorized purchases in our sample testing, which supports our conclusion that the CSB is at low risk of illegal, improper, or erroneous purchases and payments.


Recommendations issued to the CSB chairperson

| No. | Recommendation |
|-----|--|
| 1 | Update the CSB's charge card management plan to include the required elements listed in Office of Management and Budget Circular A-123, <i>Management's Responsibility for Enterprise Risk Management and Internal Control</i> , Appendix B, "A Risk Management Framework for Government Charge Card Programs," dated August 27, 2019. At a minimum, the charge card management plan should include narratives for each element, be clear and fully explained, and be available to all charge cardholders and program officials. |
| 2 | Update the CSB's risk profile to include all required components listed in Office of Management and Budget Circular A-123, <i>Management's Responsibility for Enterprise Risk Management and Internal Control</i> , dated July 15, 2016, as it relates to the charge card program. |
| 3 | Update the <i>CSB Government Purchase Card Guidance</i> , dated October 2022, to include: <ol style="list-style-type: none"> Instructions for and controls over charge cardholders' use of third-party payment providers for authorized transactions. |

| No. | Recommendation |
|-----|---|
| | <ul style="list-style-type: none"> b. Requirements for monitoring the completion of all required charge card training courses in accordance with the schedule in Appendix B to Office of Management and Budget Circular A-123. c. References to revisions of the charge card management plan and risk profile as detailed in Recommendations 1 and 2. |
| 4 | Require training of and compliance with the updated <i>CSB Government Purchase Card Guidance</i> , to help ensure that the CSB is compliant with Appendix B to Office of Management and Budget Circular A-123. |

U.S. Chemical Safety and Hazard Investigation Board Fiscal Years 2023 and 2022 Financial Statement Audit

Report No. [24-F-0030](#) | Issued March 28, 2024 | 

 Creating and maintaining an engaged, high-performing workforce.

Allmond & Company rendered a qualified opinion on the CSB's FYs 2023 and 2022 financial statements, meaning that except for material errors in unrecorded lease obligations, the statements were fairly presented. The CSB's budgetary accounting for recording lease obligations in prior years was not in accordance with U.S. generally accepted accounting principles. Allmond & Company advised the CSB that all prior-period financial statements audited from FY 2016 through 2022 contain material errors and should no longer be relied upon. Additionally, Allmond & Company identified one deficiency in internal control over financial reporting that would be considered a material weakness and one instance of potential noncompliance with the Antideficiency Act in FY 2023.

Recommendations issued to CSB management

| No. | Recommendation |
|-----|---|
| 1 | Update its accounting policies on the accounting for lease obligations to be consistent with the guidance in OMB A-11, Appendix B. |
| 2 | CSB management complete the investigation into the potential ADA violation noted and report to the appropriate parties, as necessary. |
| 3 | Develop and implement adequate internal controls to ensure lease obligations are recorded in compliance with OMB A-11, Appendix B requirements. |
| 4 | Restate the FY 2022 Statement of Budgetary Resources and related note disclosure. |
| 5 | Record the remaining obligation for the Washington, DC lease and properly state the FY 2023 Statement of Budgetary Resources and related note disclosure. |

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 Debarred for Misleading Authorities about Lead Contamination in a Missouri Park

On June 1, 2023, a former project manager for an environmental remediation company was sentenced to five years of probation and ordered to pay a \$40,000 fine after pleading guilty on July 28, 2022, in U.S. District Court, Western District of Missouri, to misleading federal authorities about lead contamination in a city park in Granby, Missouri. On January 16, 2024, the EPA debarred the former project manager from participating in federal procurement and nonprocurement programs for eight years. The debarment will terminate on August 29, 2030. In addition, the project manager's former employer paid more than \$2 million in restitution in two federal civil settlements, which were executed on April 24, 2023, and which fully compensated the government, including the EPA, for the costs to remove lead contamination from the city park. Specifically, the employer paid \$1,708,748 in a federal civil settlement agreement related to violations of the Comprehensive Environmental Response, Compensation, and Liability Act and paid \$338,119 in a federal civil settlement agreement related to violations of the False Claims Act. In 2015, the U.S. Army Corps of Engineers and the EPA awarded the environmental remediation company a contract, which totaled nearly \$12 million, to perform mine-waste remediation at the Newton County Mine Waste Remediation Superfund Site in and around Granby. This area had been contaminated by lead in the surface soil that was deposited through historical mining and smelting operations. The investigation determined that the project manager deliberately made false statements and provided false information to regulators regarding the level of lead contamination that continued to exist at the park. Because of the project manager's actions, the EPA had to hire another contractor to remediate the city park, resulting in additional costs to the EPA.

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

Businesspeople Debarred for Falsely Claiming Cleaning Product Was EPA-Approved

On December 1, 2022, two San Diego businesspeople pleaded guilty in the U.S. District Court, Southern District of California, to defrauding customers by falsely claiming that the EPA tested and approved their company's antimicrobial cleaning product to eliminate bacteria and viruses, including the SARS-CoV-2 virus, which causes the COVID-19 disease, on treated surfaces for one year with a single application. On

June 2, 2023, the two businesspeople were each sentenced to five years of probation, and each was ordered to pay \$823,669.31 in restitution. In addition, on December 5, 2023, the two businesspeople and the company were debarred from participating in federal procurement and nonprocurement programs for five years. The debarment will terminate on August 6, 2028. The investigation determined that none of the products sold under the company's name were registered as pesticides by the EPA, as required by law. Unregistered pesticides may not be sold or distributed in the United States. As part of pleading guilty, the businesspeople and their company admitted that they sold over \$800,000 worth of the unregistered pesticides.

This was a joint investigation with the EPA Criminal Investigation Division, U.S. Department of Homeland Security Homeland Security Investigations, and U.S. Postal Inspection Service.

Former Treatment Plant Superintendent Sentenced for Violating Clean Water Act

On April 1, 2021, a former superintendent of the Sioux City Wastewater Treatment Plant in Iowa was sentenced in the U.S. District Court, Northern District of Iowa, to three months' imprisonment with two years of supervised release and fined \$6,000 for violating the Clean Water Act. The Sioux City Wastewater Treatment Plant, which receives funding through EPA state revolving fund grants, is a large regional sewage treatment plant for wastewater from industrial, commercial, and residential sources throughout the region. Under its Clean Water Act permit, the plant must treat wastewater before discharging it into the Missouri River and test the wastewater to verify proper treatment. However, the former superintendent conspired to employ a fraudulent water testing procedure. On October 6, 2020, the former superintendent pleaded guilty to one count of conspiracy and one count of knowingly falsifying, tampering with, and rendering inaccurate a monitoring device or method required to be maintained under the Clean Water Act. This case had remained open until November 2023 to determine whether further investigative activity was warranted.

This was a joint investigation with the EPA Criminal Investigation Division and Federal Bureau of Investigation.

Global Firm Agreed to Pay Nearly \$500,000 for Alleged Violations of the Civil False Claims Act

On October 5, 2023, the United States Attorney's Offices for the District of Rhode Island and the Southern District of Texas entered into a civil settlement with a global professional services firm to pay over \$465,000 to the federal government for alleged violations of the civil False Claims Act. The federal government alleged that the firm, which held several contracts with the federal government, including with the EPA, improperly moved recorded labor hours between government projects with different funding sources and submitted invoices for work that was not performed. The federal government also alleged that the firm falsely inflated employee billing rates, which resulted in the submission of false invoices to multiple government agencies.

This was a joint investigation with the U.S. Department of Commerce OIG, Army Criminal Investigation Division, U.S. Coast Guard Investigative Service, U.S. General Services Administration OIG, National Aeronautics and Space Administration OIG, Department of Defense OIG Defense Criminal Investigative Service, U.S. Department of Interior OIG, and Naval Criminal Investigative Service.

Texas Company Paid Civil Penalty for Allegedly Selling Unregistered Pesticides

On November 13, 2023, a Texas company agreed to pay a civil penalty of \$2,429 to settle allegations that it violated the Federal Insecticide, Fungicide, and Rodenticide Act by distributing and selling unregistered pesticides from December 10, 2020, through August 25, 2021. The company also certified that it is presently in compliance with the requirements of the Act, which requires all pesticides sold in the United States to be registered with the EPA.

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

Nebraska Company Paid Civil Penalty for Allegedly Submitting False Rebate Submissions

On November 21, 2023, a Nebraska company agreed to pay a civil penalty of \$41,000 to settle allegations that it submitted false statements to the Nebraska Department of Environment and Energy to obtain rebates in FY 2019 to replace two diesel trucks. The rebates were funded by the EPA's Diesel Emissions Reduction Act Program. Contrary to program requirements that the vehicle, engine, or equipment to be replaced must be fully operational and in current, regular service, the company allegedly requested rebates for one vehicle that was not in regular use by falsifying mileage and for another vehicle that was neither operational nor in regular use by welding together parts from other various trucks to appear functional.

EPA Region 4 Updates Procedures to Prevent Future Equipment Theft

In June 2023, a mercury vapor analyzer was stolen from an EPA facility in Georgia. The investigation found that Region 4 did not have a required procedure for securing and sufficiently monitoring equipment outdoors during decontamination or recalibration. The OIG served EPA Region 4 with a referral letter summarizing the findings, and in February 2024, Region 4 updated its standard operating procedures to require that its Emergency Response Technical Equipment Management personnel maintain visual contact with the equipment during the entire decontamination process to ensure that the equipment is not removed from its physical location.

Open Significant Investigations

Lab Co-Owner Debarred for Reporting False Test Results

On January 30, 2023, the co-owner of a water testing laboratory company in Bridgeport, West Virginia, pleaded guilty in the U.S. District Court, Northern District of West Virginia, to one count of making a false representation within the jurisdiction of the EPA, in violation of 18 U.S.C. § 1001. On July 25, 2023, the co-owner was sentenced to one year of federal probation. On March 6, 2024, the EPA debarred the co-owner from participating in federal procurement and nonprocurement programs for one year. In May 2021, the City of Martinsburg, West Virginia, sent water samples to the laboratory company for testing pursuant to the Safe Drinking Water Act, and the co-owner reported that the samples were tested and found to be safe. The investigation determined that the co-owner of the company did not

test the water samples because the laboratory equipment was not operational. As a result, when the City of Martinsburg reported the test results to the State of West Virginia as required by EPA regulations, the city unwittingly reported false test results.

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

Individual Pleaded Guilty to Wire Fraud and Money Laundering

On January 24, 2023, two individuals were indicted in the U.S. District Court, District of New Mexico, for conspiracy to commit wire fraud and money laundering. One individual was a program director for a 501(c)(3) nonprofit organization headquartered in Santa Fe, New Mexico, while the other was a Colorado-based environmental contractor for the nonprofit organization. On July 17, 2023, the contractor pleaded guilty to one count of conspiracy to commit wire fraud. On November 9, 2023, the former program director pleaded guilty to conspiracy to commit wire fraud and money laundering. Both individuals face up to 20 years in prison. The nonprofit organization received federal funding from the EPA and the Department of the Interior for projects to restore wildlife, natural resources, and ecosystems in the American West. From February 2015 through April 2019, the former program director and the contractor conspired to inflate hours billed to the nonprofit organization and diverted more than \$240,000 from the organization.

This was a joint investigation with the Department of the Interior OIG.

Arrests Made in Maryland for \$9.5 Million Money-Laundering Conspiracy

On February 7, 2024, ten defendants were arrested at locations throughout Maryland and three search warrants were executed related to an alleged money laundering conspiracy involving more than \$9.5 million in proceeds from fraud schemes. A federal grand jury in the U.S. District Court, District of Maryland, returned two indictments in 2023 that were unsealed upon the arrests of the defendants. 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, the purchase of cashier's checks, debit card transactions, and transfers to other bank accounts controlled by the coconspirators. In addition, some coconspirators obtained and used forged and counterfeited identification documents, including some with the names of individual identity-theft victims. As of March 2024, two other defendants were arrested on charges related to this money-laundering conspiracy, for a total of 12 arrests.

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

Illinois-Based Environmental Services Company President Indicted for Obstructing Federal Investigation

On October 19, 2023, the president of an environmental services company based in Lansing, Illinois, was indicted in the U.S. District Court, Northern District of Illinois, for allegedly obstructing a federal investigation into a hotel demolition project in Harvey, Illinois. The company was hired in 2017 by the Chicago-based Cook County Land Bank Authority to conduct an asbestos survey of the hotel, which the Land Bank Authority had acquired and intended to demolish and repurpose the property using a Community Development Block Grant from the U.S. Department of Housing and Urban Development. The company's asbestos survey stated that asbestos was present, and the company was hired as a subcontractor to remove the asbestos. The EPA regulates reporting and recordkeeping requirements for asbestos under the Toxic Substances Control Act. As such, the investigation probed whether the company had accurately described the amount of asbestos in its survey to ensure the integrity of the EPA program. The indictment alleged that the president intended to impede, obstruct, and influence an investigation into whether the company accurately described the amount of asbestos present by providing asbestos waste manifests that were altered to falsely reflect the amount of asbestos removed from the hotel site and delivered to the landfill. Before the company president was indicted, another individual involved in the case pleaded guilty on March 8, 2023, to wire fraud and was sentenced on December 21, 2023, to 12 months' imprisonment and ordered to pay \$172,706.81. Pursuant to another aspect of the overall case, on November 1, 2023, an Illinois mayor was indicted on one count of obstruction and one count of perjury after being deposed in a civil lawsuit filed by a waste management company based in Riverdale, Illinois. Allegedly, the mayor's answers were intended to conceal his relationship with a recycling company's owner, including the owner's extensive involvement in the operations of a trucking company that the mayor and his wife owned on paper, but which was effectively operated by the recycling company's owner for the mayor and his wife's benefit.

This was a joint investigation with the Federal Bureau of Investigation, Department of Housing and Urban Development OIG, and EPA Criminal Investigation Division.

Three Individuals Pleaded Guilty to Falsely Claiming Hours Worked for Residential Lead Inspections in New Jersey

On November 28, 2023, a resident of New Jersey and a resident of Pennsylvania pleaded guilty in the U.S. District Court, District of New Jersey, to participating in a conspiracy to obtain overtime payments from the City of Trenton, New Jersey, for work they did not perform. They did this by fraudulently inflating the overtime hours they claimed to have worked in Trenton conducting residential lead inspections in homes of children affected by lead poisoning. New Jersey receives EPA grants to help fund the state's lead remediation efforts, lead accreditation training, and the New Jersey Department of Health Lead Program. The two residents also admitted to inflating claims for overtime hours worked in connection with a City of Trenton meal delivery program. The New Jersey resident admitted to receiving \$22,144 and the Pennsylvania resident admitted to receiving \$32,806 in overtime payments to which they were not entitled. On February 26, 2024, a second resident of New Jersey pleaded guilty in the U.S. District Court, District of New Jersey, to participating in a conspiracy to obtain overtime payments

from the City of Trenton for work not performed. This second New Jersey resident did this by fraudulently inflating the overtime hours claimed; submitting false claims for conducting residential lead inspections in New Jersey environmental justice communities; and submitting false claims for overtime work not performed in connection with a City of Trenton meal delivery program. This second New Jersey resident admitted to receiving \$32,524.12 in overtime payments to which the resident was not entitled.

This was a joint investigation with the Federal Bureau of Investigation, the Department of Housing and Urban Development OIG, and the EPA Criminal Investigation Division.

EPA Employee Indicted for Paycheck Protection Program Fraud

On December 12, 2023, seven individuals were indicted in the U.S. District Court, Northern District of Texas, on one count of conspiracy to commit wire fraud, 18 U.S.C. § 1349, and six counts of wire fraud, 18 U.S.C. § 1343, for alleged fraudulent participation in the Paycheck Protection Loan Program. One of the individuals indicted is a General Schedule 12, or GS-12, EPA employee. According to the indictment, the individuals conspired to unlawfully enrich themselves by submitting and causing the submission of false and fraudulent applications for Paycheck Protection Program loans and to use and share in the proceeds of the fraud for the personal use of the defendants and their coconspirators.

This was a joint investigation with the U.S. Small Business Administration OIG.

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 GS-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 scientific, professional, and senior-level positions.

Allegation Regarding OIG Official's Breach of Complainant Confidentiality Is Substantiated

The Administrative Investigations Directorate initiated an investigation into an allegation that a former senior OIG official improperly disclosed the identity of an EPA employee who had submitted a complaint to the OIG Hotline. The investigation found that the former senior official disclosed the employee's status as a hotline complainant during a meeting with EPA personnel, in violation of OIG procedure and the confidentiality protections afforded under section 7(b) of the Inspector General Act of 1978, 5 U.S.C. § 407(b). The investigation did not find evidence that the disclosure was intentional. The former senior official had announced plans to retire before the OIG investigation began and subsequently retired, as planned, during the pendency of the investigation. The Administrative Investigations Directorate

provided its [report of investigation](#) to the former senior official's former component office for appropriate action.

As a result of this investigation, the inspector general will be issuing an annual message to all OIG staff reminding them of their responsibilities to protect complainant confidentiality. Additionally, the OIG will be creating a standalone directive consolidating requirements and procedures covering complainant and whistleblower confidentiality.

Report 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 four Reports of Investigation—three to the EPA and one to the OIG—and received zero responses outside the 60-day or 30-day response period, as applicable.

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. We did not have any reportable instances of whistleblower retaliation this semiannual period.

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.

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 September 30, 2023* | 179 |
| Cases opened during period | 76 |
| Cases closed during period | 69 |
| Cases open as of March 31, 2024* | 186 |
| Preliminary inquiries open as of September 30, 2023 | 69 |
| Preliminary inquiries opened during period | 76 |
| Preliminary inquiries closed during period | 57 |
| Preliminary inquiries open as of March 31, 2024 | 88 |

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 | 25 | 25 |
| Convictions [‡] | 0 | 3 | 3 |
| Civil judgments, settlements, or filings | 0 | 3 | 3 |
| Criminal fines and recoveries | 0 | \$778,916 | \$778,916 |
| Civil recoveries | 0 | \$508,429 | \$508,429 |
| Prison time | 0 | 27 Months | 27 Months |
| Prison time suspended | 0 | 0 | 0 |
| Home detention | 0 | 5 months | 5 months |
| Probation | 0 | 6 years | 6 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.

[‡] 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 | 1 | 0 | 1 |
| Debarments | 0 | 9 | 9 |
| Other administrative actions* | 9 | 3 | 12 |
| Total | 10 | 12 | 22 |

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

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

* With one or more other federal agencies.

Table 7: Administrative recoveries and cost savings

| Administrative recoveries or cost savings | EPA OIG only | Joint* | Total |
|---|--------------|--------|-----------|
| Administrative recoveries† | \$0 | \$0 | \$0 |
| Cost savings | \$149,469 | \$0 | \$149,469 |

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

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

* With one or more other federal agencies.

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

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

| Investigative activity | Number |
|---|--------|
| Number of investigative reports issued | 6* |
| Number of persons referred to Department of Justice for criminal prosecution | 39 |
| Number of persons referred to state and local authorities for criminal prosecution | 1 |
| Number of criminal indictments and informations resulting from any prior referrals to prosecutive authorities | 25 |

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.

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

* This number includes reports from the Office of Investigations and the Administrative Investigations Directorate and may differ from the numbers reported in the Reports of Investigation section.

Table 9: Subjects of employee integrity investigations

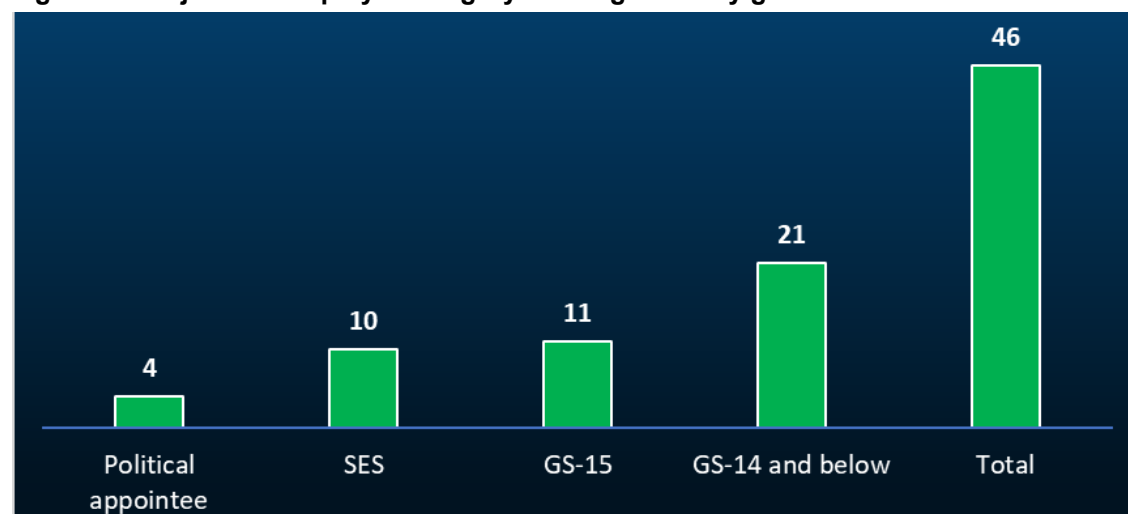
| Investigation status | Political appointee* | SES* | GS-15* | GS-14 and below**† | Total**† |
|----------------------------------|----------------------|------|--------|--------------------|----------|
| Pending as of September 30, 2023 | 4 | 11 | 11 | 17 | 43 |
| Open | 0 | 0 | 1 | 12 | 13 |
| Closed | 0 | 1 | 1 | 8 | 10 |
| Pending as of March 31, 2024 | 4 | 10 | 11 | 21 | 46 |

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.

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

* 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

Note: Numbers of pending investigations as of March 31, 2024. Includes investigations for cases related to individuals who may also be former employees and to individuals who are compensated under other federal pay plans.

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

Table 10: No-knock warrant statistics

| No-knock entry statistics | Number of occurrences |
|---|-----------------------|
| Number of no-knock entries that occurred pursuant to judicial authorization | 0 |
| Number of no-knock entries that occurred pursuant to exigent circumstances | 0 |
| Circumstances for no-knock entries in which a law enforcement officer or other person was injured in the course of a no-knock entry | 0 |

Note: Section 10(c) of Executive Order 14074, *Advancing Effective, Accountable Policing and Criminal Justice Practices To Enhance Public Trust and Public Safety*, requires federal law enforcement agencies to publicly post data regarding use of no-knock entries.

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

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. | 4 | 0.00 | 0.00 | 0.00 |
| Financial audits in accordance with the generally accepted government auditing standards. See Table A.3. | 5 | 0.00 | 0.00 | 9,995,934.00 |
| Performance audits in accordance with the generally accepted government auditing standards. See Table A.4. | 8 | 0.00 | 0.00 | 0.00 |
| 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. | 4 | 0.00 | 0.00 | 0.00 |
| Total | 21 | 0.00 | 0.00 | 9,995,934.00 |

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* |
|---------------|---|----------------------|-----------------------|------------------------|------------------------------|----------------------|
| 24-E-0020 | <i>The EPA's Enhanced Personnel Security Program Is on Track, but Challenges to Full Implementation Remain</i> | 2/8/24 | 0.00 | 0.00 | 0.00 | Yes |
| 24-E-0021 | <i>The Office of Criminal Enforcement, Forensics and Training Incorporated Essential Discovery Elements into Its Policies and Procedures, but Additional Training Could Improve Awareness</i> | 2/15/24 | 0.00 | 0.00 | 0.00 | Yes |

Appendix 1

| Report number | Report title | Report issuance date | Questioned costs (\$) | Unsupported costs (\$) | Funds put to better use (\$) | Management decision* |
|---------------|--|----------------------|-----------------------|------------------------|------------------------------|----------------------|
| 24-E-0022 | <i>Perspectives on Capacity: Managing Drinking Water State Revolving Fund Infrastructure Investment and Jobs Act Funding</i> | 2/27/24 | 0.00 | 0.00 | 0.00 | N/A |
| 24-E-0023 | <i>The EPA Needs to Determine Whether Seresto Pet Collars Pose an Unreasonable Risk to Pet Health</i> | 2/29/24 | 0.00 | 0.00 | 0.00 | Some |
| Total | 4 Reports Issued | — | 0.00 | 0.00 | 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. “Some” indicates that a management decision was made for some but not 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* |
|---------------|--|----------------------|-----------------------|------------------------|------------------------------|----------------------|
| 24-F-0002 | <i>Audit of the EPA’s Fiscal Years 2021 and 2020 Toxic Substances Control Act Service Fee Fund Financial Statements</i> | 10/12/23 | 0.00 | 0.00 | 0.00 | Yes |
| 24-F-0003 | <i>Audit of the EPA’s Fiscal Years 2022 and 2021 (Restated) Pesticides Reregistration and Expedited Processing Fund Financial Statements</i> | 10/17/23 | 0.00 | 0.00 | 0.00 | Yes |
| 24-F-0009 | <i>Audit of the EPA’s Fiscal Years 2023 and 2022 (Restated) Consolidated Financial Statements</i> | 11/15/23 | 0.00 | 0.00 | 9,995,934.00 | Yes |
| 24-F-0017 | <i>Audit of the EPA’s Fiscal Years 2022 and 2021 (Restated) Pesticide Registration Fund Financial Statements</i> | 1/18/24 | 0.00 | 0.00 | 0.00 | Yes |
| 24-F-0030 | <i>U.S. Chemical Safety and Hazard Investigation Board Fiscal Years 2023 and 2022 Financial Statement Audit</i> | 3/28/24 | 0.00 | 0.00 | 0.00 | No |
| Total | 5 Reports Issued | — | 0.00 | 0.00 | 9,995,934.00 | — |

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. “No” indicates that a management decision was not made regarding the recommendations in the report.

Appendix 1

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* |
|---------------|---|----------------------|-----------------------|------------------------|------------------------------|----------------------|
| 24-P-0001 | <i>The CSB Needs to Improve Controls over Its Charge Card Program and Comply with Federal Requirements</i> | 10/4/23 | 0.00 | 0.00 | 0.00 | Yes |
| 24-P-0004 | <i>The EPA's Pollution Prevention Grant Results Aligned with Program Goals, but a Supervisory Verification Process Is Needed</i> | 10/19/23 | 0.00 | 0.00 | 0.00 | Yes |
| 24-P-0005 | <i>The EPA Needs to Better Implement Internal Access Control Procedures for Its Integrated Risk Information System Database</i> | 10/31/23 | 0.00 | 0.00 | 0.00 | Yes |
| 24-P-0011 | <i>The EPA Took Additional Actions to Strengthen Controls to Account for and Secure Laptops</i> | 12/14/23 | 0.00 | 0.00 | 0.00 | N/A |
| 24-P-0012 | <i>The EPA Clean School Bus Program Could Be Impacted by Utility Delays</i> | 12/27/23 | 0.00 | 0.00 | 0.00 | N/A |
| 24-P-0014 | <i>The EPA Needs to Improve the Completeness and Accuracy of the Obligation and Outlay Information That It Reports in USAspending.gov</i> | 1/9/24 | 0.00 | 0.00 | 0.00 | Yes |
| 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> | 3/14/24 | 0.00 | 0.00 | 0.00 | Yes |
| 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> | 3/21/24 | 0.00 | 0.00 | 0.00 | Yes |
| Total | 8 Reports Issued | — | 0.00 | 0.00 | 0.00 | — |

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.

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* |
|---------------|--|----------------------|-----------------------|------------------------|------------------------------|----------------------|
| 24-N-0018 | <i>OIG Report to the Office of Management and Budget on the EPA's and CSB's Implementation of Recommendations Related to Purchase and Travel Card Programs</i> | 1/31/24 | 0.00 | 0.00 | 0.00 | N/A |
| 24-N-0019 | <i>OIG Report to the Office of Management and Budget on the EPA's Semi-Annual Report on Purchase Charge Card Violations</i> | 1/31/24 | 0.00 | 0.00 | 0.00 | N/A |
| 24-N-0024 | <i>Lack of Vulnerability Remediation for Weaknesses Identified Within the Central Data Exchange System Increases the Risk of Cyberattacks</i> | 3/5/24 | 0.00 | 0.00 | 0.00 | N/A |
| 24-N-0025 | <i>Central Data Exchange System Identity Data Are Unreliable</i> | 3/5/24 | 0.00 | 0.00 | 0.00 | N/A |
| Total | 4 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. 23-P-0022, <i>The EPA Could Improve Its Review of Drinking Water State Revolving Fund Programs to Help States Assist Disadvantaged Communities</i> , issued July 11, 2023 | 3. Require states to assign executed loans to the appropriate capitalization grant in the EPA Office of Water state revolving fund database. | Assistant Administrator for Water | The Agency provided a response on October 2, 2023, which outlined the EPA's planned corrective actions for Recommendation 3. Based on the information provided, the OIG believes the corrective actions meet the intent of the recommendation and, as of November 6, 2023, considers all recommendations for this report to be resolved. | 10/2/23 |
| Report No. 23-E-0027, <i>The EPA Has Not Verified that Its Laboratories Comply with Hazardous Waste Requirements</i> , issued August 14, 2023 | 1. Implement mechanisms to verify EPA lab compliance with hazardous waste requirements, including small quantity generator status renotification and large quantity generator biennial reporting. | Assistant Administrator for Enforcement and Compliance Assurance | The Agency provided a response on October 13, 2023, which outlined the EPA's planned corrective actions for Recommendation 1.b. Based on the information and supporting documentation provided, the OIG believes the corrective actions meet the intent of the recommendation and, as of November 9, 2023, considers all recommendations for this report to be resolved. | 10/13/23 |
| Report No. 23-P-0003, <i>The EPA Met 2018 Water Security Requirements but Needs to Improve Oversight to Support Water System Compliance</i> , issued November 21, 2022 | 1. In consultation with the assistant administrator for Enforcement and Compliance Assurance, as appropriate, update and implement a plan for supporting community water systems so that all water systems comply with all certification | Assistant Administrator for Water | The Agency provided a response on November 15, 2023, which outlined the EPA's planned corrective actions for Recommendations 1–4. Based on the information and supporting documentation provided, the OIG believes the corrective | 11/15/23 |

Appendix 2

| Report | Prior unresolved recommendations | Action office or official | Management decision | Decision date |
|--------|---|---------------------------|---|---------------|
| | <p>requirements included in section 2013 of the America's Water Infrastructure Act, for past and future deadlines related to risk and resilience assessments and emergency response plans.</p> <p>2. In consultation with the assistant administrator for Enforcement and Compliance Assurance, as appropriate, update processes related to the EPA's implementation of section 2013 of the America's Water Infrastructure Act, including processes to monitor community water system compliance with section 2013 and record noncompliance and contact information in the EPA's Safe Drinking Water Information System database. These processes should be documented in the EPA's <i>Water Supply Guidance Manual</i>.</p> <p>3. In consultation with the assistant administrator for Enforcement and Compliance Assurance, as appropriate, review a sample of risk and resilience assessments and emergency response plans completed by community water systems under section 2013 of the America's Water Infrastructure Act to determine improvements, particularly in cybersecurity, that can be made as the water systems complete the Act's ongoing certification requirements.</p> <p>4. In consultation with the assistant administrator for Enforcement and Compliance Assurance, as appropriate, develop formal guidance for community water</p> | | actions meet the intent of the recommendations and, as of December 6, 2023, considers all recommendations for this report to be resolved. | |

Appendix 2

| Report | Prior unresolved recommendations | Action office or official | Management decision | Decision date |
|--|--|--|--|---------------|
| | systems that clearly describes the America's Water Infrastructure Act section 2013 requirements, including certification deadlines, enforcement steps, and the improvements identified as a result of Recommendation 3. Incorporate this guidance into the EPA's <i>Water Supply Guidance Manual</i> . | | | |
| Report No. 23-E-0033, <i>The EPA Needs to Address Increasing Air Pollution at Ports</i> , issued September 21, 2023 | 2. Set quantifiable performance measures for the Ports Initiative, including a plan for identifying the measures' baselines. | Assistant Administrator for Air and Radiation | The Agency provided a response on November 16, 2023, which outlined the EPA's planned corrective actions for Recommendation 2. Based on the information and supporting documentation provided, the OIG believes the corrective actions meet the intent of the recommendation and, as of December 26, 2023, considers all recommendations for this report to be resolved. | 11/16/23 |
| Report No. 23-P-0031, <i>The EPA Should Determine How Its Elevation Policy Can More Effectively Address Risks to the Public</i> , issued September 7, 2023 | 1. Determine how <i>the Policy on Elevation of Critical Public Health Issues</i> can more effectively achieve its purpose of elevating public health and environmental risks that require higher levels of attention than the Agency's usual processes could address. | Deputy Administrator | The Agency provided a response on January 12, 2024, which outlined the EPA's planned corrective actions for Recommendation 1. Based on the information and supporting documentation provided, the OIG believes the corrective actions meet the intent of the recommendation and, as of February 4, 2024, considers all recommendations for this report to be resolved. | 1/12/24 |
| 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 | 8. Conduct an external peer review on the 1,3-Dichloropropene cancer-risk assessment. | Assistant Administrator for Chemical Safety and Pollution Prevention | The Agency provided a response on February 17, 2024, which outlined the EPA's planned corrective actions for Recommendation 8. As of March 31, 2024, the OIG was deliberating as to whether the corrective actions meet the intent of the recommendation. | 2/17/24 |

Source: OIG summary of the Agency's responses regarding unresolved recommendations and the OIG's evaluation of these responses. (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 38 reports from 2008 to September 30, 2023. There are 81 unimplemented recommendations for the EPA, with potential cost savings of \$74.5 million. There are no 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

| | |
|-----------------|---|
| DA | Deputy Administrator (within the Office of the Administrator) |
| 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 |
| OEJECR | Office of Environmental Justice and External Civil Rights |
| 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 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. | 16 | 46,707.00 |
| Human health and environmental issues. See Table A.9. | 65 | 27,800.00 |
| Total | 81 | 74,507.00 |

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 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 March 31, 2024. 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. 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 | <p>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.</p> <p>5. Expand existing guidance to include a deadline for post-closeout annual report submission.</p> <p>6. Assess whether any of the \$46.6 million of program income under closeout agreements should be returned to the government.</p> | <p>Rec. 1: Unresolved</p> <p>Rec. 5: Unresolved</p> <p>Rec. 6: Unresolved</p> | <p>Rec. 1: 9/30/27</p> <p>Rec. 5: 9/30/27</p> <p>Rec. 6: 9/30/24</p> | Rec 6: 46,578.00 |

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. 22-F-0007, <i>EPA's Fiscal Years 2021 and 2020 (Restated) Consolidated Financial Statements</i> , issued November 15, 2021 | OECA | 5. Implement a system that tracks the dates when accounts receivable source documents need to be submitted and are submitted by the Office of Enforcement and Compliance Assurance to the Cincinnati Finance Center. | Unresolved | 11/30/22, 4/28/23, 11/30/23, 11/29/24 | — |
| Report No. 22-P-0001, <i>EPA's Fiscal Year 2020 Fourth-Quarter Compliance with the Digital Accountability and Transparency Act of 2014</i> , issued November 8, 2021 | OMS | 3. Update the EPA's grants management system to align with the data standards of the Digital Accountability and Transparency Act of 2014, including all parts of data elements reported therein, and to allow input only of the acceptable values outlined for each data element in <i>DATA Act Information Model Schema, Reporting Submission Specification</i> . | 9/30/23 | 4/30/24 | — |
| 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>2. OMS and OCFO: Provide resources for supervisors, timekeepers, and reservists on their roles and responsibilities related to military leave under the law and Agency policies.</p> <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</p> | <p>Rec. 2: 4/30/22</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. 2: 7/29/22, 10/1/22, 6/30/25, 10/15/23,[†] 10/1/24</p> <p>Rec. 3: 7/29/22, 6/3/27, 10/1/24,[†] 7/31/25</p> <p>Rec. 4: 3/31/22, 7/29/22, 9/3/26</p> <p>Rec. 5: 12/15/21, 12/30/22, 8/31/26</p> <p>Rec. 6: 12/15/21, 12/30/22, 8/31/26</p> | <p>Rec. 5: 11.00</p> <p>Rec. 6: 118.00</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>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>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> | | <p>Rec. 7: 9/30/22, 12/31/26</p> <p>Rec. 8: 12/30/22, 2/28/27</p> <p>Rec. 9: 12/1/22, 12/1/24</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 (\$)* |
|---|---------------|---|--|--|---|
| 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 | — |
| Report No. 17-P-0368, <i>Improved Management of the Brownfields Revolving Loan Fund Program Is Required to Maximize Cleanups</i> , issued August 23, 2017 | OLEM | 14. Develop and implement a method for the Office of Brownfields and Land Revitalization to track closed cooperative agreements with pre- and post-program income. | 3/19/19 [‡] | 12/31/23, 9/30/24 | — |
| Report No. 14-P-0109, <i>Internal Controls Needed to Control Costs of Emergency and Rapid Response Services Contracts, as Exemplified in Region 6</i> , issued February 4, 2014 | Region 6 | 3. Direct contracting officers to require that the contractor adjust all its billings to reflect the application of the correct rate to team subcontract other direct costs. | Unresolved | 9/30/24 | — |

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 March 31, 2024, 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 memorandum, 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 is earlier than the previous revised planned completion date.

[‡] The EPA closed out the recommendation, but the OIG determined that the corrective action was not completed. The planned completion date is the date the Agency initially certified the recommendation was completed.

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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. 23-P-0034, <i>The EPA Should Improve Management of Great Lakes Restoration Initiative Grants</i> , issued September 26, 2023 | Region 5 | 3. In consultation with the Acquisition and Assistance Branch, develop a records-management program for the Great Lakes National Program Office. 4. Require periodic training and provide learning resources on grants management to all project officers and grant specialists, with an emphasis on recordkeeping; cost reviews; timely, accurate, and comprehensive baseline-monitoring reports; and other topics determined by the results of the routine internal review process established in Recommendation 1c. | Rec. 3: 6/30/24 Rec. 4: 6/30/24 | — | — |
| Report No. 23-E-0033, <i>The EPA Needs to Address Increasing Air Pollution at Ports</i> , issued September 21, 2023 | OAR | 1. Assess the air-monitoring network around ports and in near-port communities and create a plan to enhance the air-monitoring network where any gaps are identified. 2. Set quantifiable performance measures for the Ports Initiative, including a plan for identifying the measures' baselines. | Rec. 1: 9/30/25 Rec. 2: Unresolved | Rec. 2: 9/30/25 | — |
| 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 | 3. Develop a risk-based selection process to verify Renewable Identification Number transactions entered in the EPA Moderated Transaction System. 4. Develop a process to reduce the likelihood of Quality Assurance Program auditor conflicts of interest during Quality Assurance Program reviews. 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. | Rec. 3: 12/31/24 Rec. 4: 6/30/24 Rec. 7: 9/30/28 Rec. 8: 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 (\$)' |
|---|---------------|---|--|--|---|
| | | 8. Enhance or replace the Data Analysis and Reporting Tool to facilitate external information requests and Office of Enforcement and Compliance Assurance inspections. | | | |
| Report No. 23-P-0031, <i>The EPA Should Determine How Its Elevation Policy Can More Effectively Address Risks to the Public</i> , issued September 7, 2023 | DA | 1. Determine how the Policy on Elevation of Critical Public Health Issues can more effectively achieve its purpose of elevating public health and environmental risks that require higher levels of attention than the Agency's usual processes could address. 2. As necessary, develop and implement a strategy to enhance EPA staff understanding of the circumstances and process for implementing the Policy on Elevation of Critical Public Health Issues. | Rec. 1: Unresolved Rec. 2: 6/30/24 | Rec. 1: 9/30/24 | — |
| Report No. 23-P-0030, <i>The EPA Should Enhance Oversight to Ensure that All Refineries Comply with the Benzene Fenceline Monitoring Regulations</i> , issued September 6, 2023 | OECA | 1. Provide guidance to delegated authorities on what constitutes a violation of the benzene fenceline monitoring regulations to assist the delegated authorities in taking action when a violation may have occurred. 2. Develop an internal strategy to address refineries that fail to reduce their benzene concentrations to 9 micrograms per cubic meter or below after initially exceeding the action level. The strategy should include best practices for: a. Monitoring benzene concentrations to determine whether a refinery has exceeded the action level and continues to exceed 9 micrograms per cubic meter in subsequent two-week sampling periods. b. Verifying that the refinery submits an appropriate corrective action plan that addresses the root cause and actions. c. Taking action at refineries that fail to undertake root cause analyses or implement appropriate corrective actions—such as Clean Air Act section 114 information requests, inspections, and enforcement actions— to reduce benzene concentrations to 9 micrograms per cubic meter. d. Coordinating between | Rec. 1: 4/1/24 Rec. 2: 4/1/24 Rec. 4: 4/1/24 Rec. 5: 4/1/24 Rec. 6: 4/1/24 | Rec. 1: 10/1/24 Rec. 2: 10/1/24 Rec. 4: 10/1/24 Rec. 6: 10/1/24 | — |

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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>the Office of Enforcement and Compliance Assurance, the EPA regions, and the delegated authorities.</p> <p>4. Provide guidance to the EPA regions to periodically review all reported benzene monitoring data to identify any gaps in data for refineries.</p> <p>5. In consultation with applicable EPA regions and delegated authorities, investigate OIG-identified benzene monitoring data gaps and ensure submission of missing data if the data are available.</p> <p>6. Provide guidance in the form of best practices to the EPA regions for investigating missing benzene monitoring data, securing the submission of the data if the data are available, and evaluating enforcement options.</p> | | | |
| Report No. 23-P-0029, <i>The EPA Needs to Further Refine and Implement Guidance to Address Cumulative Impacts and Disproportionate Health Effects Across Environmental Programs</i> , issued August 22, 2023 | OEJECR | 2. Develop and implement performance measures to monitor progress in identifying and addressing cumulative impacts and disproportionate health effects across EPA programs. | 6/30/24 | — | — |
| Report No. 23-E-0027, <i>The EPA Has Not Verified that Its Laboratories Comply with Hazardous Waste Requirements</i> , issued August 14, 2023 | OECA | 1. Implement mechanisms to verify EPA lab compliance with hazardous waste requirements, including small quantity generator status renotification and large quantity generator biennial reporting. | Unresolved | 12/31/24 | — |
| Report No. 23-E-0023, <i>The EPA Should Update Its Strategy, Goals, Deadlines,</i> | Region 3 | 1. Lead the Chesapeake Bay Program in developing a new strategy to specifically address nonpoint source pollution. | Rec. 1: Unresolved Rec. 3: Unresolved | Rec. 1: 12/31/24 Rec. 3: 12/31/24 | — |

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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 Accountability Framework to Better Lead Chesapeake Bay Restoration Efforts</i> , issued July 18, 2023 | | 3. Lead the Chesapeake Bay Program in developing an effective assurance mechanism to ensure that nonpoint source load reductions will be achieved by jurisdictions under the Chesapeake Bay Total Maximum Daily Load. | | | |
| Report No. 23-E-0013, <i>The EPA's January 2021 PFBS Toxicity Assessment Did Not Uphold the Agency's Commitments to Scientific Integrity and Information Quality</i> , issued on March 7, 2023 | ORD, OMS, and DA | <p>1. ORD: Develop or update existing policies, procedures, or guidance to specify whether and under which applicable circumstances comments expressing scientific disagreement can be provided for a scientific product that has undergone all peer reviews and required developmental steps set forth in applicable actions or project plans.</p> <p>3. OMS: Update EPA policies and procedures on environmental information quality to require additional quality assurance reviews for EPA products that undergo major changes to scientific results or conclusions after quality assurance reviews have been completed.</p> <p>4. DA: Develop or update existing policies, procedures, or guidance to require policy-makers and decision officials to uphold transparency through timely, formal communication of decisions and the scientific bases to change results or conclusions of a scientific product to originating authors in the absence of peer review.</p> | <p>Rec. 1: Unresolved</p> <p>Rec. 3: Unresolved</p> <p>Rec. 4: Unresolved</p> | <p>Rec. 1: 12/31/24</p> <p>Rec. 3: 9/30/24</p> <p>Rec. 4: 7/31/24</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 | OECA and OAR | 2. OECA: In consultation with the Office of Air and Radiation, define roles and responsibilities within and between the Office of Enforcement and Compliance Assurance and the Office of Air and Radiation for the residential wood heater program, so that sufficient subject-matter expertise and resources are leveraged to ensure that certification test reports are substantively reviewed. | <p>Rec. 2: Unresolved.</p> <p>Rec. 4: Unresolved</p> <p>Rec. 5: Unresolved</p> <p>Rec. 6: Unresolved</p> | <p>Rec. 2: 11/1/24</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 (\$)* |
|---|---------------|--|--|---|---|
| | | <p>4. OAR: 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. OAR: 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>6. OAR: Establish mechanisms to promote independence between emissions testing labs and third-party certifiers.</p> | | | |
| Report No. 23-E-0006, <i>The EPA Is Not on Track to Reach Its National Compliance Initiative Goals to Stop Aftermarket Defeat Devices and Tampered Vehicles</i> , issued January 25, 2023 | OECA | <p>3. In collaboration with EPA regions, revise and reissue the strategic plan for the <i>Stopping Aftermarket Defeat Devices for Vehicles and Engines</i> National Compliance Initiative. In addition, ensure the strategic plan includes quantifiable deliverables that are linked to known compliance-rate baselines that promote the success of the initiative, as well as a mechanism to acquire and implement post-training feedback from regions and states.</p> <p>5. Use the OIG's state questionnaire results, as well as feedback from regions and states, to identify and implement a strategy to overcome barriers and incentivize voluntary complementary work by the states to stop aftermarket defeat devices and tampering.</p> | <p>Rec. 3: Unresolved</p> <p>Rec. 5: Unresolved</p> | <p>Rec. 3: 11/29/24</p> <p>Rec. 5: 11/30/24</p> | — |
| 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 | OCSPP | <p>1. Issue guidance on when and how to conduct the kinetically derived maximum dose approach in cancer-risk assessments for pesticides.</p> <p>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</p> | <p>Rec. 1: Unresolved</p> <p>Rec. 9: 6/30/24</p> | Rec. 1: 6/30/24 | — |

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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 (\$)' |
|---|---------------|---|--|--|---|
| | | assessments, in accordance with the Office of Management and Budget's Final Information Quality Bulletin for Peer Review. | | | |
| Report No. 21-E-0264, <i>EPA Needs an Agencywide Strategic Action Plan to Address Harmful Algal Blooms</i> , issued September 29, 2021 | OW | 4. Assess and evaluate the available information on human health risks from exposure to cyanotoxins in drinking water and recreational waters to determine whether actions under the Safe Drinking Water Act are warranted. | 12/31/22 | 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 | <p>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.</p> <p>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.</p> <p>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.</p> <p>4. Issue for public review and comment both the Environmental Fate and Effects Division's approach for the reevaluation of List 1–Tier 1 data and the revised List 1–Tier 2 wildlife recommendations.</p> | <p>Rec. 1: 9/30/25</p> <p>Rec. 2: 9/30/24</p> <p>Rec. 3: 9/30/24</p> <p>Rec. 4: 12/31/23</p> | 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 (\$)' |
|--|---------------|--|---|---|---|
| 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: (a) an initial review of a sample of synthetic-minor-source permits in different industries that are issued by state, local, and tribal agencies to assess whether the permits adhere to EPA guidance on practical enforceability, including limits that are technically accurate, have appropriate time periods, and include sufficient monitoring, record-keeping, and reporting requirements; (b) a periodic review of a sample of synthetic-minor-source permits to occur, at a minimum, once every five years; and (c) procedures to resolve any permitting deficiencies identified during the initial and periodic reviews.</p> <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 assure continuous compliance with associated limits, and revise the regulatory requirements as appropriate.</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</p> <p>Rec. 2: 10/31/25</p> <p>Rec. 5: 10/31/24</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>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 | OCSP | 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-0132, <i>Resource Constraints, Leadership Decisions, and Workforce Culture Led to a Decline in Federal Enforcement</i> , issued May 13, 2021 | OECA | 2. Integrate the results of the workforce analysis into the Office of Enforcement and Compliance Assurance's annual and strategic planning processes. | Unresolved | 4/1/24, 10/1/24 | — |
| Report No. 21-P-0131, <i>Staffing Constraints, Safety and Health Concerns at EPA's National Enforcement Investigations Center May Compromise Ability to Achieve Mission</i> , issued May 12, 2021 | OECA | <p>9. Develop and incorporate metrics on the National Enforcement Investigations Center work environment and culture into Office of Criminal Enforcement, Forensics, and Training senior management performance standards, such as results from the annual Federal Employee Viewpoint Survey, periodic culture audits, or other methods to measure progress.</p> <p>10. Develop and incorporate metrics that address work environment and culture into National Enforcement Investigations Center senior management performance standards.</p> | <p>Rec. 9: Unresolved</p> <p>Rec. 10: Unresolved</p> | <p>Rec. 9: 6/28/24</p> <p>Rec. 10: 6/28/24</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 (\$)' |
|--|---------------|---|--|--|---|
| Report No. 21-P-0130, <i>EPA Helps States Reduce Trash, Including Plastic, in U.S. Waterways but Needs to Identify Obstacles and Develop Strategies for Further Progress</i> , issued May 11, 2021 | OW | 1. Evaluate the obstacles to implementing the Clean Water Act to control trash in U.S. waterways and provide a public report describing those obstacles. | Rec. 1: 12/31/21 | Rec. 1: 6/30/22, 2/28/23, 9/1/23, 4/22/24, 8/31/24 | — |
| 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>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.</p> | <p>Rec. 2: Unresolved</p> <p>Rec. 3: Unresolved</p> <p>Rec. 4: 9/30/24</p> | <p>Rec. 2: 9/30/24</p> <p>Rec. 3: 9/30/28</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 (\$)* |
|--|---------------------|--|--|--|---|
| 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 | — |
| Report No. 21-P-0032, <i>Region 2's Hurricanes Irma and Maria Response Efforts in Puerto Rico and U.S. Virgin Islands Show the Need for Improved Planning, Communications, and Assistance for Small Drinking Water Systems</i> , issued December 3, 2020 | Region 2 | 3. In coordination with the Office of Water, implement America's Water Infrastructure Act in Puerto Rico and the U.S. Virgin Islands by: (a) developing and implementing a strategy to provide training, guidance, and assistance to small drinking water systems as they improve their resilience and (b) establishing a process for small drinking water systems to apply for America's Water Infrastructure Act grants. This process should include (1) implementing the EPA's May 2020 guidance provided to small drinking water systems regarding resilience assessments and (2) establishing a public information campaign to inform small drinking water systems of the America's Water Infrastructure Act grant opportunity, qualifying requirements, and application deadlines. | 12/31/22 | 6/30/23, 6/30/24 | — |
| Report No. 20-E-0333, <i>Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination</i> , issued September 28, 2020 | OEJECS [§] | 1. Develop and implement a plan to coordinate relevant Agency program, regional, and administrative offices with the External Civil Rights Compliance Office to develop guidance on permitting and cumulative impacts related to Title VI. | Rec. 1: Unresolved Rec. 5: Unresolved Rec. 6: Unresolved | Rec. 1: 9/30/22, 9/30/23, 9/30/24 | — |

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|--|----------------------|--|--|---|---|
| | | <p>5. Determine how to use existing or new data to identify and target funding recipients for proactive compliance reviews, and develop or update policy, guidance, and standard operating procedures for collecting and using those data.</p> <p>6. Develop and deliver training for the deputy civil rights officials and EPA regional staff that focuses on their respective roles and responsibilities within the EPA's Title VI program.</p> | | <p>Rec. 5: 3/31/23, 9/30/23, 12/31/23, 6/30/24</p> <p>Rec. 6: 3/31/22, 9/30/23, 9/30/24</p> | |
| Report No. 20-P-0173, <i>Further Efforts Needed to Uphold Scientific Integrity Policy at EPA</i> , issued May 20, 2020 | ORD/ Science Advisor | <p>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.</p> <p>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.</p> <p>8. With the assistance of the Scientific Integrity Committee, develop and implement a process specifically to address and resolve allegations of Scientific Integrity Policy violations involving high profile issues or senior officials, and specify when this process should be used.</p> | <p>Rec. 6: 6/30/22</p> <p>Rec. 7: 9/30/20</p> <p>Rec. 8: 6/30/21</p> | <p>Rec. 6: 6/30/24</p> <p>Rec. 7: 4/30/22, 6/30/22, 3/31/23, 6/30/24</p> <p>Rec. 8: 6/30/22, 3/31/23, 6/30/24</p> | — |
| Report No. 20-P-0146, <i>EPA's Processing Times for New Source Air Permits in Indian Country Have Improved, but Many Still Exceed Regulatory Time Frames</i> , issued April 22, 2020 | OAR | <p>1. Implement a system that is accessible to both the EPA and the applicants to track the processing of all tribal-New-Source-Review permits and key permit dates, including application received, application completed, draft permit issued, public comment period (if applicable), and final permit issuance.</p> | <p>Rec. 1: 9/30/21</p> <p>Rec. 2: 3/31/22</p> | <p>Rec. 1: 9/30/22, 9/30/23, 9/30/24</p> <p>Rec. 2: 9/30/22, 9/30/23, 9/30/24</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 (\$)' |
|---|---------------|---|--|--|---|
| | | 2. Establish and implement an oversight process to verify that the regions update the tribal-New-Source-Review permit tracking system on a periodic basis with the correct and required information. | | | |
| Report No. 19-P-0207, <i>EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance</i> , issued June 27, 2019 | OAR | 1. Develop and implement electronic checks in the EPA's Emissions Collection and Monitoring Plan System or through an alternative mechanism to retroactively evaluate emissions and quality assurance data in instances where monitoring plan changes are submitted after the emissions and quality assurance data have already been accepted by the EPA. | 3/31/25 | — | — |
| Report No. 18-P-0240, <i>EPA Needs a Comprehensive Vision and Strategy for Citizen Science that Aligns with Its Strategic Objectives on Public Participation</i> , issued September 5, 2018 | DA | 2. Through appropriate EPA offices, direct completion of an assessment to identify the data management requirements for using citizen science data and an action plan for addressing those requirements, including those on sharing and using data, data format/standards, and data testing/validation. | 12/31/20 | 3/31/23, 12/31/23, 6/30/24 | — |
| 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 | OCSP | 1. In coordination with the Office of Enforcement and Compliance Assurance, develop and implement a methodology to evaluate the impact of the revised Agricultural Worker Protection Standard on pesticide exposure incidents among target populations. | Unresolved | 12/31/22, 12/31/23, 6/28/24 | — |
| Report No. 16-P-0275, <i>EPA Has Not Met Certain Statutory Requirements to Identify Environmental Impacts of Renewable Fuel Standard</i> , issued August 18, 2016 | OAR | 2. Complete the anti-backsliding study on the air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act. 3. Determine whether additional action is needed to mitigate any adverse air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act. | Rec. 2: 9/30/24 Rec. 3: 9/30/24 | — | — |

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. 10-P-0224, <i>EPA Should Revise Outdated or Inconsistent EPA-State Clean Water Memoranda of Agreement</i> , issued September 14, 2010 | OW | 2-2. Develop a systematic approach to identify which states have outdated or inconsistent memorandums of agreements; renegotiate and update those Memorandums of Agreements using the Memorandum of Agreements template; and secure the active involvement and final, documented concurrence of headquarters to ensure national consistency. | 9/28/18 | 9/30/20, 9/30/22, 9/30/23, 4/30/25 | — |
| 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 March 31, 2024, 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 memorandum, 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.

§ These recommendations were originally made to the OGC. The Agency requested that the OEJECR take over responsibility for these recommendations.

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) 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: OI-DC-2023-ADM-0148

An EPA Senior Executive Service employee allegedly enabled automatic forwards from the employee's government email account to the employee's personal email account without authorization. The investigation determined that the employee did not enable an automatic forward of emails, nor did the employee violate any administrative privacy or rules-of-behavior policies. The allegation was 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.

In this semiannual period, the EPA OIG initiated an external peer review of the investigative organization of the Department of Transportation OIG. Our review covers the period from October 1, 2022, through September 30, 2023. This review is being conducted in accordance with the *Quality Assessment Review Guidelines for Investigative Operations of Federal Offices of Inspector General*, as set forth by the Council of the Inspectors General on Integrity and Efficiency.

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 Treasury Inspector General for Tax Administration OIG issued the most recent peer review report on the EPA OIG on April 15, 2021. The peer review covered the three-year period ending September 30, 2020, and found that the EPA OIG suitably designed and complied with its system of quality control to provide the EPA OIG with reasonable assurance that it performed and reported work in conformity with applicable professional standards in all material respects. The EPA OIG received an external peer review rating of “pass.”

Investigation

The Amtrak OIG completed the most recent mandated Council of the Inspectors General on Integrity and Efficiency quality assurance review of our Office of Investigations and issued its related report 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 EPA OIG investigations and using law enforcement powers.

Appendix 6

OIG Contact Information

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

OnlineHotline complaint [form](#)**Phone**

(888) 546-8740

EmailOIG.Hotline@epa.gov

For congressional and media inquiries, contact the Office of Congressional and Public Affairs using the information below:

Phone

(202) 566-2391

EmailOIG.PublicAffairs@epa.gov

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

OnlineContact [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:

EmailOIG_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 the OIG's whistleblower protection [webpage](#).

Contact us:



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