



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

MAY 10 2013

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

SUBJECT: OSWER Response to the OIG Evaluation Report, "Improvements Needed in EPA Training and Oversight for Risk Management Program Inspections"

FROM: Mathy Stanislaus
Assistant Administrator

A handwritten signature in black ink, appearing to read "Mathy Stanislaus".

TO: Carolyn Copper
Assistant Inspector General for Program Evaluation

Thank you for sending us the final version of the OIG Evaluation Report, "Improvements Needed in EPA Training and Oversight for Risk Management Program Inspections" and incorporating the comments and edits submitted by the Office of Solid Waste and Emergency Response (OSWER) into the final report. We understand recommendations 6 and 9 are currently unresolved and require information about our corrective actions. Here is our response and corrective actions for those two (2) recommendations which should be noted as resolved.

In Chapter 2, recommendation 6 states:

Correct limitations in the Emergency Management Portal – Field Readiness Module training system, such as populating the system with a complete list of training requirements and enabling certificates to be uploaded into the system.

This recommendation has been completed as follows:

- All training requirements that have been given to OEM have been loaded into the Field Readiness (FR) system. The members of FR's Change Control Board have been advised that other training requirements can be loaded into the system at any time. In addition, all FR data managers have the ability to add new training requirements whenever they find that one is missing and to use such added items immediately thereafter.
- FR version 10.7, implemented March 29, 2013, includes the feature that allows document files to be uploaded and attached to any training or certification record.

In Chapter 3, recommendation 9 states:

Analyze national program measures to assess whether the number of required inspections should be modified to allow more time for inspecting larger and more complex high-risk facilities.

OSWER and OECA jointly have revised their National Program Manager Guidance, and the Agency guidance is expected to be published by September 30, 2013. OSWER, in coordination with OECA, has reduced the overall number of RMP inspections while increasing the percentage of high risk inspections in order to ensure the Regions have the resources and time to inspect these more complex, higher risk facilities. The inspection numbers have been modified as follows:

- FY2012: inspection target was 5% of the total universe and 25% of those inspections being at high risk facilities;
- FY2013: inspection target is 4% of the total universe and 30% of those inspections being at high risk facilities; and
- FY2014: inspection target is proposed to be 4% of the total universe and 36% of those inspections being at high risk facilities.

We are also providing more in-depth, technical training to our inspectors related to the types of high risk facilities they will be inspecting.

Again, we appreciate the opportunity to provide our responses to the recommendations in this report. If you have any questions or comments, please contact Kim Jennings at (202) 564-7998.