



At a Glance

Why We Did This Review

We conducted this review to determine whether the U.S. Environmental Protection Agency (EPA) has adequate management controls for ensuring the effectiveness of its Clean Air Act Section 112(r) risk management program (RMProgram) inspections. Congress enacted the RMProgram to reduce the risk of airborne chemical releases that could harm the public and lessen the impact of releases that do occur. Regulated substances include 77 toxic chemicals that could cause death or serious health effects from short-term exposures and 63 flammable substances. Properly performed by trained, knowledgeable inspectors, inspections help ensure that facilities comply with RMProgram requirements. EPA is responsible for assessing compliance at over 86 percent of RMProgram facilities nationwide.

This report addresses the following EPA Goals or Cross-Cutting Strategies:

- *Enforcing environmental laws.*
- *Cleaning up communities and advancing sustainable development.*

For further information, contact our Office of Congressional and Public Affairs at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2013/20130321-13-P-0178.pdf

Improvements Needed in EPA Training and Oversight for Risk Management Program Inspections

What We Found

EPA's management controls for ensuring inspector training and inspection quality provide limited assurance of the effectiveness of its RMProgram inspections. Proper training helps inspectors conduct quality inspections. However, 15 of the 45 RMProgram inspectors nationwide received inspector credentials without documentation indicating that they met minimum training requirements. Further, six of the 12 supervisors did not meet minimum training requirements. EPA's management controls did not detect or prevent the cases of missed or undocumented training. Weaknesses in controls included limitations in training tracking systems and a lack of procedures to ensure that supervisors met their training requirements. Also, contracts and cooperative agreements for inspection services did not include training requirements.

EPA can strengthen its RMProgram inspection guidance and oversight to increase assurance that inspectors conduct effective inspections. EPA guidance did not establish minimum guidelines for the scope of inspections. Further, EPA did not have a process to monitor the quality of inspections. Generally, inspection reports did not explain the extent to which the inspectors reviewed specific elements of a covered process to determine compliance. Also, our observations of two inspections indicated that procedures to verify the facilities' RMProgram activities were limited.

An effective inspection program that includes properly trained personnel, guidance, and oversight helps ensure compliance with program regulations, thus decreasing the risk of airborne releases of chemicals that could harm the public.

Recommendations and Agency Corrective Actions

We recommend that EPA strengthen its management controls to ensure that inspectors and supervisors meet minimum training requirements. Also, EPA should strengthen guidance to include minimum inspection scope for RMProgram facilities. Further, EPA should develop minimum inspection reporting requirements and a monitoring program to assess the quality of inspections. EPA generally concurred with our draft report's recommendations, and has already initiated corrective actions in some cases. We consider five recommendations open and one recommendation closed. The Agency's response met the intent of the remaining recommendations, but the recommendations remained unresolved pending receipt of a formal corrective action plan with milestone dates and responsible party/office.

Noteworthy Achievements

EPA has made efforts to enhance the quality of RMProgram inspections. For example, EPA provided advanced training courses for inspectors in 2010, 2011, and March 2012. According to EPA, it also provided the training in August, October, and November 2012. EPA also conducted an internal assessment of the quality of inspection reports across all 10 regions in 2011.