



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

OFFICE OF
INSPECTOR GENERAL

October 17, 2012

The Honorable Rafael Moure-Eraso
Chairperson and Chief Executive Officer
U.S. Chemical Safety and Hazard Investigation Board
2175 K Street, NW, Suite 400
Washington, DC 20037-1809

Dear Mr. Moure-Eraso:

The U.S. Environmental Protection Agency (EPA) Office of Inspector General (OIG) plans to begin fieldwork with a modified objective from our May 15, 2012, preliminary research objective on the U.S. Chemical Safety and Hazard Investigation Board's (CSB's) investigation process. This project is included in our annual audit plan to contribute to improving CSB's business practices and accountability. The Product Line Director and Project Manager for this project will be Michael Davis and Gloria Taylor-Upshaw, respectively.

The purpose of this memorandum is to confirm our mutual understandings on the objective and scope for the audit of CSB's investigation process, as well as responsibilities of CSB and the EPA OIG during the project.

The EPA OIG's objective is to determine if CSB has an effective system for managing its investigative process. The OIG plans to conduct its work at CSB headquarters and Denver offices. The project will be conducted using applicable *Generally Accepted Government Auditing Standards*. The anticipated benefit of this project is to help CSB identify areas for improving its investigation process.

During the audit, we will continue to provide updates on this project and other projects on a regular basis by email and/or during meetings with staff.

To ensure the success and timely completion of this project, CSB has agreed to provide the following:

- Access to Total Records and Information Management (TRIM) and other related databases as needed
- Access to CSB staff located in Denver

We will contact the appropriate personnel to arrange a mutually agreeable time to discuss the objectives and the purpose of the fieldwork phase of our project. We are particularly interested in

any areas of concern that you may have. We will answer any of your questions about the project process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the course of the project.

If you or your staff has any questions, please contact Gloria Taylor-Upshaw at (404) 562-9842 or taylor-upshaw.gloria@epa.gov; or Mike Davis at (513) 487-2363 or davis.michaeld@epa.gov.

Sincerely,



Melissa M. Heist
Assistant Inspector General for Audit

Enclosure:

1. Information Requested for the CSB Investigation Process Audit

cc: Mark Griffon, Board Member
Daniel M. Horowitz, Managing Director
John Lau, Deputy Managing Director
Anna Brown, Director, Office of Administration
Hillary Cohen, Office of Congressional, Public, and Board Affairs
Arthur A. Elkins, Jr., Inspector General
Charles Sheehan, Deputy Inspector General
Aracely Nunez-Mattocks, Chief of Staff
Eileen McMahon, Assistant Inspector General for Congressional and Public Affairs
Patricia Hill, Assistant Inspector General for Mission Systems
Carolyn Copper, Assistant Inspector General for Program Evaluation
Patrick Sullivan, Assistant Inspector General for Investigations
Alan Larsen, Counsel to the Inspector General
Nancy Long, Deputy Assistant Inspector General for Congressional and Public Affairs
Richard Eyermann, Deputy Assistant Inspector General for Audit

Information Requested for the CSB Investigation Process Audit

Please provide the following information in electronic format by October 25, 2012:

1. The number of CSB investigation reports, case studies, and videos planned for completion during FY 2010, FY 2011 and FY 2012, and those actually completed during FY 2010, FY 2011 and FY 2012. Please provide the names of the investigations, studies, and videos to support the numbers.
2. Written criteria and/or Board Order used by CSB's Board and investigators to decide whether to adopt a final product as a case study, investigative report, safety bulletin, or video.
3. CSB's Board Order or formal system for measuring actual performance and promoting accountability in the investigation process.
4. The Board-approved current or final work plans for the following six investigations from our preliminary research (and identify where this information is kept at CSB):
 - CSB2008-4-I-TX BP Texas City, TX
 - CSB2008-7-I-WI PCA (Packaging Corporation of America)
 - CSB2009-14-I-TX CITGO Corpus Christi Refinery East
 - CSB2010-2-I-PR Caribbean Petroleum Corp
 - CSB2010-5-I-TX Texas Tech University
 - CSB2011-4-I-TN Hoeganaes
5. Written policies or Board Orders that address electronic records management for investigation files and the requirement to use TRIM to record all investigative work.