

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

## JAN 7 2011

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

## **MEMORANDUM**

SUBJECT: Response to Early Warning Report: "Website for Coal Combustion Products Partnership Conflicts with Agency Policies;" Report No. 11-P-0002

FROM: Mathy Stanislaus Assistant Administrator

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TO: Arthur A. Elkins, Jr. Inspector General

The Office of Solid Waste and Emergency Response (OSWER) has reviewed the subject final report issued October 13, 2010 by the Office of Inspector General (OIG) and the recommendations contained therein. The purpose of this memorandum is to transmit our response to those recommendations. As noted in the final report, recommendation 1, the removal of the C2P2 site, is completed and closed as of the issuance of the report.

OSWER agreed with recommendation 2 to identify the breakdowns in management controls that allowed actions prohibited by EPA ethics policies to occur and implement controls to establish accountability. The OIG accepted OSWER's proposed corrective action plan of providing training to the Office of Resource Conservation and Recovery (ORCR) management team on the EPA standards and policies associated with the use of the EPA logo and endorsements, which the Office of General Counsel conducted. The Resource Conservation and Sustainability Division, which implemented the Coal Combustion Product Partnership program, also received this training.

Furthermore, OSWER reviewed its process for Website content approval and has developed a new process that strengthens management's role. Specifically, in addition to ensuring proper management review and approval, the new web governance process establishes a Web Content Manager to serve as managing editor for all content on ORCR's Website, to review all new content and revisions to current content, and to ensure coordination of content organization across the office. The new process also requires that all requests for web revisions, updates, repairs, or new content be directed to a central repository in an effort to improve transparency, accountability, efficiency of operations, and coordination within the communications office. Below is a summary of the corrective actions that have been taken.

Recommendations

- Direct the immediate removal of the C2P2 Website during the coal ash rulemaking process.
  Status: Completed (7/2/10)
- Identify the breakdowns in management controls that allowed actions prohibited by EPA ethics policies to occur and implement controls to establish accountability.

Corrective Action 2a: Training by OGC to the ORCR management team and Resource Conservation and Sustainability Division on the EPA standards and policies associated with the use of the EPA logo and endorsements.

Status: Completed (10/19/10)

Corrective Action 2b: Revise ORCR's process for Website content approval which strengthens management's role.

Status: Completed (1/7/11)

OSWER has completed the corrective actions associated with this final report and requests that the OIG close these recommendations in its system. If you have any questions, please contact Betsy Smidinger at 703-308-8710.