



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

AUG 23 2012

THE INSPECTOR GENERAL

**MEMORANDUM**

**SUBJECT:** Evaluation of Agency Response to OIG Report 12-P-0417, *Weaknesses in EPA's Management of the Radiation Network System Demand Attention*

**TO:** Gina McCarthy  
Assistant Administrator for Air and Radiation

Craig E. Hooks  
Assistant Administrator for Administration and Resources Management

Thank you for submitting your corrective action plan, dated July 16, 2012, for the subject report that had been issued April 19, 2012. This memorandum addresses the extent to which the corrective action plan answers the report recommendations.

We agree with your corrective action plan and proposed courses of action for most recommendations but not 3.c. and 5. Therefore, report recommendations 3.c. and 5 will remain open until we have come to an agreement on corrective action.

Recommendation 3.c. recommended that the Assistant Administrator for Air and Radiation direct the National Air and Radiation Environmental Laboratory (NAREL) to improve planning and management for the Radiation Network (RadNet) to include, at a minimum, how often filter changes are needed to provide consistency in throughput at NAREL's analytical laboratory and implement a metric for these filter changes. In response to the recommendation, the Agency stated that, for throughput purposes, NAREL plans on receiving approximately 4,000 filter samples annually for analysis. The frequency with which filters need to be changed varies widely depending on many variables, including site-specific conditions such as the amount of particles in the air. NAREL stays in regular contact with the RadNet operators and, on average, filters from operating monitors are changed at least every 2 weeks.

Taking into account the Agency's response to recommendation 3.c, the Agency should also identify as part of its corrective action plan, in addition to what we initially recommended, the variable site-specific conditions that are the basis for the filter changes and the frequency for changing them under such conditions, and incorporate and record these as requirements into the Quality Assurance Project Plan (QAPP). This is essential because the May 2000 *EPA Quality Manual for Environmental Programs* states:


The QAPP is a critical planning document for any environmental data operation since it documents how environmental data operations are planned, implemented, documented, and assessed during the life cycle of a program, project, or task. The ultimate success of an environmental program or project depends on the adequacy and sufficiency of the quality of the environmental data collected and used in decision-making. This may depend significantly on the adequacy of the QAPP and its effective implementation.

The Agency should include and provide the Office of Inspector General a copy of the 2012 QAPP when the changes are finalized.

In response to recommendation 5, the Agency stated that new and/or ongoing contracts will receive priority for completing past performance reporting over expired contracts, although contractor performance evaluations will be brought up to date as applicable. We agree with Agency actions for contract EP-W-07-076. However, the Agency did not yet address the status of performance evaluations overdue under contract EP-D-08-068.

We will close out all report recommendations except recommendations 3.c and 5 in the Office of Inspector General assignment tracking system. In accordance with EPA Manual 2750, any corrective actions not yet completed must be tracked in the Agency's Management Audit Tracking System until completed. To ensure timely resolution of the report recommendations, please respond with respect to recommendations 3.c. and 5 by September 17, 2012.

If you or your staff have any questions regarding this memo, please contact Melissa Heist, Assistant Inspector General for Audit, at (202) 566-0899; or Michael D. Davis, Director, Efficiency Audits, at (513) 487-2363.



Arthur A. Elkins, Jr.

cc. Maureen Hingeley, Audit Follow-Up Coordinator, OAR  
Sandy Womack, Audit Follow-Up Coordinator, OARM  
Melissa Heist, Assistant Inspector General for Audit  
Richard Eyermann, Deputy Assistant Inspector General for Audit  
Michael D. Davis, Director, Efficiency Audits, OIG