



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

OFFICE OF  
INSPECTOR GENERAL

August 7, 2017

**MEMORANDUM**

**SUBJECT:** Follow-Up Review on Two EPA OIG Reports (Report Nos. 2007-P-00002 and 13-P-0221) Involving Asbestos Cleanup in Libby, Montana  
Project No. OPE-FY17-0027

**FROM:** Eric Lewis, Director, Special Program Reviews  
Office of Program Evaluation

**TO:** *See Below*

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin a follow-up review to verify that the Deputy Administrator's office, the Office of Land and Emergency Management (formerly the Office of Solid Waste and Emergency Response), the Office of Research and Development, and EPA Region 8 implemented the corrective actions in response to the previous OIG recommendations in the following two reports issued by the EPA OIG:

- Report No. 2007-P-00002, *EPA Needs to Plan and Complete a Toxicity Assessment for the Libby Asbestos Cleanup*, issued December 5, 2006.
- Report No. 13-P-0221, *Better Planning, Execution and Communication Could Have Reduced the Delays in Completing a Toxicity Assessment of the Libby, Montana, Superfund Site*, issued April 17, 2013.

Follow-up reviews are included in our fiscal year 2017 annual plan. Our review will focus on the status of corrective actions for the six reported recommendations documented in the agency's Management Audit Tracking System as having been completed. Our review objectives will be to verify whether the various responsible offices implemented corrective actions to address the previous OIG recommendations to:

1. Fund and execute a comprehensive amphibole asbestos toxicity assessment to determine (1) the effectiveness of the Libby removal actions, and (2) to determine whether more actions are necessary. The toxicity assessment should include the effects of asbestos exposure on children. The EPA Science Advisory Board should review the toxicity assessment and report to the Office of the Administrator and the Libby Community Advisory Group whether the proposed toxicity assessment can sufficiently protect human health.
2. Disclose significant risks to completing the Libby Action Plan, update the Libby Action Plan to reflect changes in milestone dates, and distribute original and revised plans to stakeholders.

3. Establish a charter to define project roles and responsibilities for completing the remaining corrective actions under the Libby Action Plan and determine whether the Science Advisory Board or another organization will review the completed risk assessment.
4. Direct the Science Advisory Board to determine and report on whether limitations exist in applying the cancer and noncancer values to the determination of acceptable levels of exposure to asbestos in Libby.
5. Ensure that future contracts issued through interagency agreements are within the scope of those agreements.
6. Require the development of a priority ranking list among the ongoing Integrated Risk Information System assessments, and that the Assistant Administrator be informed of any recommended changes in those priorities. The rankings should consider human health consequences.

We will contact you to arrange a mutually agreeable time to discuss our objectives and the purpose of our project. We would also be 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. Throughout the project, we will provide updates on a regular basis.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978 to have timely access to personnel and all materials necessary to complete its objectives. We will request your resolution if an agency employee or contractor refuses to provide requested records to the OIG, or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the Semiannual Report to Congress.

The project will be supervised by me, and the Project Manager will be Jee Kim. Any information related to the project should be addressed to me at (202) 566-2664 or [lewis.eric@epa.gov](mailto:lewis.eric@epa.gov), or Jee Kim at (913) 551-7009 or [kim.jee@epa.gov](mailto:kim.jee@epa.gov). We will provide routine updates on the status of our review to agreed-upon contacts from your office. If you or your staff have any questions, please do not hesitate to contact us.

Addressees:

Mike Flynn, Acting Deputy Administrator

Barry Breen, Acting Assistant Administrator, Office of Land and Emergency Management

Robert Kavlock, Acting Assistant Administrator and EPA Science Advisor,  
Office of Research and Development

Deb Thomas, Acting Regional Administrator, Region 8

cc: Ryan Jackson, Chief of Staff

Henry Darwin, Chief of Staff for Operations

Kevin Chmielewski, Deputy Chief of Staff for Operations

Chris Robbins, Acting Deputy Assistant Administrator for Management, Office of Research and Development

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