



At a Glance

Why We Did This Review

The Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA) conducted this audit to determine whether the EPA categorized the sensitivity of hazardous waste material information within the Electronic Manifest (e-Manifest) system as prescribed by the National Institute of Standards and Technology (NIST).

Federal agencies are required to determine the security categorization of their information and information systems. As the security categorization increases from low to high, the minimum security controls become increasingly rigorous.

This report addresses the following:

- *Ensuring the safety of chemicals.*

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Management Alert: To Minimize Risk of Environmental Harm, the Security Categorization of Electronic Manifest System Data Needs to Be Re-Evaluated

What We Found

The EPA categorized the sensitivity of the information within its e-Manifest system at such a low level that planned information system security controls would not minimize the risk of environmental harm. NIST provides guidelines that federal agency's must use for categorizing systems based on risk to determine minimum information system security controls. The low-level categorization occurred, in part, because:

A breach of hazardous material information within e-Manifest may facilitate terrorist or other criminal activities.

- Personnel responsible for categorizing the sensitivity of the e-Manifest system and information did not sufficiently consider homeland security implications as they relate to chemicals of interest.
- EPA personnel considered the e-Manifest information to be in a low risk category that only requires minimal system security controls to be implemented to protect the information.
- The EPA did not consider further uses of the e-Manifest system; the system could potentially be used by first responders in their efforts to remediate incidents involving the transportation of hazardous waste.

As a result, the EPA plans to place sensitive hazardous waste information in its system without implementing stronger minimum information system security controls commensurate with the harm that could be caused if the information is compromised.

Recommendations and Planned Agency Corrective Actions

We recommend that the EPA work with the U.S. Department of Homeland Security to gain an understanding of the risk of a breach of the data within e-Manifest, and work with NIST to determine the proper data classification to re-evaluate the categorization of the information within e-Manifest. Further, we recommend that the EPA regularly re-evaluate the categorization.

We briefed the EPA on April 10, 2018. While the EPA disagreed with the finding, the agency agreed with our recommendations. The EPA indicated it intends to provide details on planned corrective actions and target completion dates in a formal response to this report. The recommendations remain unresolved pending receipt of that information. The EPA's response is in Appendix B.