



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

THE INSPECTOR GENERAL

June 8, 2020

MEMORANDUM

SUBJECT: Closeout of Office of Inspector General Report No. 18-P-0217, *Management Alert: To Minimize Risk of Environmental Harm, the Security Categorization of Electronic Manifest System Data Needs to Be Re-Evaluated*, issued June 21, 2018

FROM: Sean W. O'Donnell *Sean W O'Donnell*

TO: Peter Wright, Assistant Administrator
Office of Land and Emergency Management

The Office of Inspector General followed up on your Office's progress in implementing the corrective actions documented in your July 26, 2019 certification memorandum sent to the Office of the Chief Financial Officer. Based on the documentation provided, the Office of Inspector General concluded that the Office of Land and Emergency Management completed corrective actions for all recommendations in the subject report. See attached for a summary of the report recommendations, the proposed corrective actions, and the evidence we reviewed to assess completion.

If you or your staff have any questions, please contact Acting Assistant Inspector General for Audit and Evaluation Kathlene Butler at (404) 562-9736 or butler.kathlene@epa.gov; or Director of the Information Resources Management Directorate Rudolph M. Brevard at (202) 566-0893 or brevard.rudy@epa.gov.

Attachment

cc: Barry Breen, Principal Deputy Assistant Administrator for Land and Emergency Management
Steven Cook, Deputy Assistant Administrator for Land and Emergency Management
Kecia Thornton, Audit Follow-Up Coordinator, Office of Land and Emergency Management
Kathlene Butler, Acting Assistant Inspector General for Audit and Evaluation
Rashmi Bartlett, Deputy Assistant Inspector General for Audit and Evaluation
Christine El-Zoghbi, Deputy Assistant Inspector General for Audit and Evaluation
Richard Eyermann, Deputy Assistant Inspector General for Audit and Evaluation
Rudolph M. Brevard, Director, Information Resources Management Directorate, Office of
Inspector General

**Summary of Recommendations and Corrective Actions
Report No. 18-P-0217**

No.	Recommendation	Proposed corrective action	Evidence reviewed	Date completed
1	Obtain an understanding of the impact of a breach of the EPA's Electronic Manifest system's hazardous material information from the U.S. Department of Homeland Security and re-evaluate the security categorization accordingly.	Office of Land and Emergency Management (OLEM) engaged with the U.S. Department of Homeland Security to factor DHS concerns into assessing the impact of a breach of the EPA's Electronic Manifest system's hazardous waste information and determined whether re-evaluation of the security categorization, independent of the annual re-evaluation is necessary.	<p>OLEM met with DHS on July 11, 2018, to discuss e-Manifest security controls along with similarities and dissimilarities between the e-Manifest and DHS systems. OLEM prepared a Biennial Report Analysis of hazardous waste quantities above DHS thresholds and concluded that the amounts were nominal.</p> <p>OLEM re-evaluated e-Manifest security controls and assessed the controls at the original security categorization of "low." The assessment is documented in the System Security Plan dated February 22, 2019.</p> <p>The initial Authorization to Operate was dated June 25, 2015. The revised Authorization to Operate was dated May 17, 2018.</p>	5/17/18
2	In coordination with the EPA Office of Environmental Information and the National Institute of Standards and Technology, determine whether the Electronic Manifest system's hazardous material information should be handled as Pollution Prevention and Control Information or Inventory Control Information with special considerations for hazardous materials, and re-evaluate the security categorization accordingly.	OLEM will coordinate with the EPA's Office of Environmental Information and, as necessary, the National Institute of Standards and Technology to determine whether the Electronic Manifest system's information should be handled as Pollution Prevention and Control Information with special considerations for hazardous wastes and determine whether re-evaluation of the security categorization, independent of the annual re-evaluation, is necessary.	<p>OLEM consulted with the Office of Environmental Information (currently a sub-office within the Office of Mission Support) and conducted research on the classification of information using the National Institute of Standards and Technology criteria to evaluate whether the information in e-Manifest was properly categorized. In an internal memorandum dated April 30, 2019, OLEM documented its conclusion that the information in e-Manifest was correctly categorized as Pollution Prevention and Control Information.</p> <p>OLEM re-evaluated e-Manifest security controls and assessed the controls at the original security categorization of "low." The assessment is documented in the System Security Plan dated February 22, 2019.</p> <p>The initial Authorization to Operate was dated June 25, 2015. The</p>	4/30/19

No.	Recommendation	Proposed corrective action	Evidence reviewed	Date completed
			revised Authorization to Operate was dated May 17, 2018.	
3	Re-evaluate the security categorization of the Electronic Manifest system annually or when there are significant changes to the system (including allowing the system to be used by emergency responders) as required by the EPA's Information Security – Risk Assessment Procedures.	OLEM's e-Manifest security plan includes a process for re-evaluating the security categorization of the Electronic Manifest system annually or when there are significant changes, (including any potential use of the system by emergency responders), as required by the EPA's Information Security – Risk Assessment Procedures.	<p>OLEM has re-evaluated the security categorization of the system every year since 2018.</p> <p>The former e-Manifest System Security Plan was dated June 19, 2017. The revised e-Manifest System Security Plan was dated February 22, 2019. OLEM re-evaluated e-Manifest security controls and assessed the controls at the original security categorization of "low."</p> <p>The e-Manifest System Security Plan dated February 22, 2019, includes a process for re-evaluating the security categorization of the e-Manifest system annually or when there are significant changes.</p> <p>The initial Authorization to Operate was dated June 25, 2015. The revised Authorization to Operate was dated May 17, 2018.</p>	2/22/19