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Goal	Evaluation Title/Evaluator/Scope	Findings	Recommendations
1	**Office of Transportation and Air Quality (OTAQ) Quality Program Assistance Visit (QPAV)**/Office of Environmental Information Quality Staff/Four key areas were reviewed to provide insight into the quality assurance practices and management controls associated with OTAQ products and services. The areas included organizational structure and management control; fiduciary responsibilities for grants, contracts, and interagency agreements; quality assurance collaboration and working relationships; and product development and service delivery. The QPAV report is an internal Agency document and is not published for public access.	OTAQ has a mature quality system that follows the Agency's Quality Policy (CIO 2106.0). Its management embraces and advocates an excellent quality structure and a culture of continuous improvement. OTAQ is implementing an enhanced quality program that integrates quality activities into its products and services.	None.
1	**National Vehicle and Fuel Emissions Laboratory (NVFEL) Environmental Performance Audits**/EPA Safety, Health and Environmental Management Division/The evaluation reviewed whether NVFEL is in environmental compliance and is meeting the Agency's environmental objectives. The reports from these evaluations are internal documents and are not published for public access.	NVFEL needs to improve its tracking of environmentally preferable purchases to support the FY 2015 sustainability target in Executive Order 13514, "Federal Leadership in Environmental, Energy and Economic Performance." There were no environmental or noncompliance issues.	NVFEL needs to improve its tracking of environmentally preferable purchases.
1	**Key Activities in EPA's Integrated Urban Air Toxics Strategy Remain Unimplemented**/EPA, Office of Inspector General (OIG)/The	Since 1990, EPA has issued more than 100 rules to address air toxics emissions, and data indicate that air toxics	The inspector general (IG) recommended that the Assistant Administrator for Air and Radiation: 1)

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	objective was to evaluate the status of EPA, state, and local agency efforts to control urban air toxics and to determine how the EPA tracks progress toward three goals in its 1999 Integrated Urban Air Toxics Strategy: 1) Attain a 75 percent reduction in the incidence of cancer attributable to exposure to hazardous air pollutants (HAPs) emitted by large and stationary sources nationwide. 2) Attain a substantial reduction in public health risks (such as birth defects and reproduction effects) posed by HAP emissions from small industrial/commercial sources known as area sources. 3) Address disproportionate impacts of air toxics hazards across urban areas, such as geographic "hotspots," highly exposed population subgroups, and predominately minority and low-income communities. http://www.epa.gov/oig/reports/2010/20100623-10-P-0154.pdf	emissions have decreased. However, OIG found that EPA had not implemented key requirements of the Clean Air Act Section 112(k), including developing emission standards for area source categories, submitting a second Urban Air Toxics Report to Congress (due in 2002), and identifying urban areas that continue to experience significant public health risks from air toxics exposures. In addition, 10 years after issuing the 1999 Integrated Urban Air Toxics Strategy, EPA still had not implemented key activities outlined in the strategy, such as establishing a minimum federally required risk-based program. Without such a program, state and local agencies may not implement programs to adequately address the health risks from urban air toxics.	submit the required second Urban Air Toxics Report to Congress, identifying urban areas that continue to experience high or unacceptable levels of risk, communicating EPA's plan to reduce risks in those areas, and indicating the factors that have hindered implementation of the strategy to address those risks; and 2) determine how the Agency will measure progress in meeting the goals of the Integrated Urban Air Toxics Strategy. If the development and maintenance of the 1990 or similar baseline is not cost effective, EPA should develop and inform Congress of the Agency's alternative measures for assessing progress in meeting the intent of the statutory goals.
1	**EPA Oversight and Policy for High Priority Violations of Clean Air Act Need Improvement**/EPA OIG)/The objective was to evaluate the reason why EPA and states are not addressing high priority violations of the Clean Air Act in a timely manner (generally within	The IG determined that high priority violations were not being addressed in a timely manner because EPA regional offices and the states did not follow the high priority violation policy, EPA Headquarters did	The IG recommended that the Assistant Administrator for Enforcement and Compliance Assurance: 1) direct regions to comply with the high priority violation policy; 2)

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	270 days). http://www.epa.gov/oig/reports/2010/20091014-10-P-0007.pdf	not oversee regional and state high priority violations performance, and the EPA regional offices did not oversee state performance. The IG found that 30 percent of state-led high priority violations and about 46 percent of EPA-led high priority violations were unaddressed after 270 days, according to EPA data. This can result in significant environmental and public health impacts.	make necessary revisions to the policy; and 3) implement proper management controls over high priority violations.
2	**EPA Needs Definitive Guidance for Recovery Act and Future Green Reserve Projects**/EPA OIG/The objective was to examine whether EPA had developed and implemented adequate controls to ensure that states actively solicit green reserve projects before reprogramming such funds to traditional projects. http://www.epa.gov/oig/reports/2010/20100201-10-R-0057.pdf	The IG found that EPA had not provided clear and comprehensive guidance to states for determining the eligibility of green reserve projects. Without adequate guidance, EPA regions and states cannot adequately determine the extent to which these projects reduce energy and water usage compared to projects traditionally funded under the State Revolving Fund (SRF) program. EPA promoted a green approach to wastewater and drinking water programs for at least a year prior to the American Recovery and Reinvestment Act, which earmarked a portion of SRF recovery dollars to green projects.	The IG recommended that the Assistant Administrator for Water develop and revise guidance and, as appropriate, specific criteria that states can employ to assist them in identifying green reserve projects. The IG also recommended that EPA conduct timely reviews of state-submitted green projects and, where necessary, business cases.

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2	**EPA Needs a Better Strategy to Identify Violations of Section 404 of the Clean Water Act**/ EPA OIG/The objective was to assess EPA's enforcement role in protecting federally regulated wetlands, streams, and other surface waters under Section 404 of the Clean Water Act (CWA §404). The CWA §404 regulates the discharge of dredged or fill material into wetlands and surface waters. http://www.epa.gov/oig/reports/2010/20091026-10-P-0009.pdf	The IG found that EPA lacks a systematic framework for identifying the §404 violations for which it is responsible under a 1989 Memorandum of Agreement (MOA). Primarily because of its limited field presence related to CWA §404 violations, EPA identifies violations through a passive, reactive method of relying on complaints and referrals from external sources. An incomplete national data system and sporadic coordination with federal and state partners further impair EPA's ability to maintain an effective CWA §404 enforcement program.	The IG recommended that the Assistant Administrator for Enforcement and Compliance Assurance, in consultation with the Assistant Administrator for Water, develop and implement a comprehensive CWA §404 enforcement strategy addressing issues such as communication with enforcement partners and a system to track violations. The IG also recommended that the Agency revise the 1989 Memorandum of Agreement in collaboration with the Assistant Secretary of the Army for Civil Works. Without an effective strategy, EPA cannot be assured that it is sufficiently protecting wetlands and other surface waters from CWA §404 violations involving dredging and fill activity.
2	**Evaluation of the EPA Region 1 New England Marina Initiative**/Industrial Economics, Inc. and Eastern Research Group, Inc. (EPA funded)/The primary objective was to measure the impact of the New England Marina Initiative in increasing	The initiative resulted in the implementation of a variety of strategic environmental assistance projects, the impact of which was measured using statistically valid principles. The results	Specific recommendations include: emphasize near-term, practical outcomes; use program evaluation results to prioritize goals, objectives, and

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	marina owner understanding of marina-related environmental impacts; improving compliance with state and federal environmental regulations in the areas of hazardous waste, stormwater, and oil and fuel; and promoting capacity building in best environmental practices. http://www.epa.gov/evaluate/pdf/neweng-marinas.pdf	included significant improvements in compliance and utilization of best management practices (e.g., decrease in fuel and oil runoff, increase in use of biodegradable cleaners), as well as a few significant enforcement cases. A considerable number of marinas installed pressure wash water control systems; designed and implemented required Spill, Prevention, Control, and Countermeasure (SPCC) plans; and met stormwater permit requirements, including obtaining permits and developing and implementing Stormwater Pollution Prevention Plans. Stakeholders, on average, were satisfied with program materials and activities. They suggested specific improvements to the program's checklist and workshops. A positive outcome is the valuable growing stakeholder collaborative network. Additional data sources are needed to determine the impact of marinas on the health of marina	activities; refine the initiative by identifying specific pollutants and/or ecological characteristics most relevant (focus more on environmental performance measures such as water quality benchmark concentration levels and hazardous waste toxicity levels); actively brand and promote the initiative; and clarify the initiative's theory of change (identify which activities/materials are intended to lead to which desired changes among marina owners).

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		communities.	
3	**EPA Should Improve Its Oversight of Federal Agency Superfund Reviews**/EPA OIG)/The objective was to evaluate how EPA identifies and monitors issues and recommendations in reviews conducted at federal facility Superfund sites. Specific questions include: 1) How are issues and recommendations in the five-year review tracked and implemented? 2) Do unimplemented recommendations affect compliance? 3) What effect do unimplemented issues and recommendations have on the protectiveness of the remedy? http://www.epa.gov/oig/reports/2010/20100602-10-P-0133.pdf	The IG found that EPA does not have effective management controls to monitor the completion of review recommendations at federal facility Superfund sites. For reviews signed since 2006, 84 percent of review recommendations were overdue as of April 28, 2009. EPA regional staff does not consistently follow Superfund five-year review process guidance and policies for updating the status of review issues and recommendations in the Comprehensive Environmental Response, Compensation, and Liability Information System. OIG also found that the Agency's overdue or unimplemented recommendations to improve underperforming or nonperforming cleanup remedies may increase the risk to human health and the environment.	The IG recommended that the Assistant Administrator for Solid Waste and Emergency Response implement improved management controls to monitor the completion of federal facility review recommendations; ensure reviews are submitted every five years; improve the management of the nonconcurrence process; clarify and describe enforcement options to achieve completion of recommendations; enter all review recommendations into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS); and improve data quality.
3	**The Evaluation of the WasteWise Program**/Industrial Economics, Inc. (EPA funded)/The purpose was to determine the extent to which the WasteWise (WW) program has a behavioral influence over the	The evaluation found that WW 1) contributes to changes in partner's waste management activities; 2) collects data necessary to establish credible	The evaluation recommended that WW 1) increase communications with and among partners; 2) continue offering high-value technical tools to

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	waste prevention and recycling activities of its partners. Additional emphasis was given to determining if there are statistical methodologies that can be used to quantify the direct influence that WW has on partner behavior and achievements. The evaluation used mixed methods to determine the influence, including: literature reviews; survey of U.S. Postal Service (a large WW partner with multiple locations); focus groups of WW partners; analysis of partner activities; and comparative review of best practices from other EPA partnership programs. Those involved in the focus groups represented partners from diverse industry sectors; partners who had spent varying lengths of time in the program; and partners whose waste prevention and recycling activities vary from simple to complex. http://www.epa.gov/evaluate/impact.htm	baselines for partners; 3) creates a powerful incentive for program participation and reporting by offering access to its Re-TRAC data management and reporting system; 4) emulates best practices for data collection and quality control; and 5) is one of several factors that contributes to influencing partner behavior. The evaluation also found that developing a statistical methodology that can isolate WW's direct influence on partners may not be obtainable for voluntary programs in general, given the inability to control for and isolate from other influencing factors.	partners; 3) provide additional enhancements to the existing Waste Wise Re-TRAC waste data management and reporting system; and 4) conduct additional research to help isolate and quantify the influence WW may have on partner behavior.
3	**Core National Approach to Response (NAR)**/EPA, Office of Emergency Management (OEM), with contractor support/The objective was to evaluate all aspects of emergency preparedness in EPA Headquarters and regional offices and among special teams responding to emergencies. No public document.	The combined Core NAR 2010 score is not calculated yet. Issues to be addressed are often identified in the course of the Core NAR evaluation.	EPA should develop appropriate policies to direct what work the regional offices and special teams need to undertake to maximize emergency preparedness. OEM maintains a "NAR Preparedness Plan" that lists issues that need to be addressed and a timetable for addressing them.
3	**Evaluating Progress Towards**	Most of the sites	Provide clear guidance

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	Implementing Institutional Controls (ICs) at Superfund Sites/EPA Office of Superfund Remediation and Technology Innovation/The objective was to evaluate progress toward implementing effective ICs at Superfund sites using a subset of sites across the country. The sample included sites representing each EPA region, site type, and action-lead type. In total, 70 sites were evaluated, of which 59 had reached construction completed. No public document.	evaluated were in the Institutional Controls Tracking System (ICTS). IC implementation costs were estimated in four site decision documents of the 70 sites reviewed in the study. ICs still need to be implemented at a number of sites, as intended by the decision documents or five-year review reports.	for ICs on the following: 1) defining IC objectives in remedy decision documents; 2) documenting the need for ICs where sites are not for unlimited use or unlimited exposure; and 3) determining protectiveness when ICs are not in place. Continue to work with EPA regional offices to document ICs in ICTS. Review decision documents with cost estimates of IC implementation as a possible model for future decision documents.
3	**Leaking Underground Storage Tank (UST) Backlog Phase 2 Study**/EPA Office of Underground Storage Tanks (OUST), with contractor support/The objective was to answer the questions: 1) Why has the number of cleanups of leaking USTs fallen short of objectives? 2) What is causing sites to remain in the backlog? 3) How can we better direct EPA attention and resources? Document will be posted on OUST's web site when available.	Many factors affect the pace of cleaning up releases, including the availability and mechanisms of funding, statutory requirements, and program structure. Data indicate that the majority of releases in the national backlog contaminate ground water resources. In general, remediation of ground water contamination is more technically complex, long term, and expensive than remediation of soil contamination. Although ground-water-contaminated	EPA will begin working with states to identify and implement backlog reduction strategies, explore further questions about the existing backlog, examine funding issues for leaking UST cleanups, examine cleanup goals and milestones, and support the states in improving leaking UST program management. The results of the evaluation have provided tank programs a focus in

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		sites predominate, soil-only sites persist in the backlog as well. Most striking is the large number of open releases that are old (greater than 10 years) and the large number of old releases that have not yet made it to the site assessment stage. The states lack resources to fully address all these expensive cleanups in the near term. State cleanup funds and staff are often stretched thin and cleanup costs are increasing.	sharing historic best practices and building on state program success. In addition, the opportunities identified will be discussed with state programs to develop strategies, pursue limited additional analyses, and move more cleanups toward completion.
3	**Superfund: EPA's Estimated Costs to Remediate Existing Sites Exceed Current Funding Levels, And More Sites are Expected To Be Added to the National Priorities List (NPL)**/Government Accountability Office (GAO)/The objective was to determine: 1) the cleanup and funding status at currently listed nonfederal NPL sites with unacceptable or unknown human exposure; 2) what is known about EPA's future cleanup costs at nonfederal NPL sites; 3) EPA's process for allocating remedial program funding; and 4) how many NPL sites some state and EPA officials expect will be added over the next five years, along with their expected cleanup	The findings of our report are based on an electronic survey of branch chiefs from the 10 EPA regions; data from EPA's Comprehensive Environmental Response, Compensation, and Liability Information System and Integrated Financial Management System (IFMS); EPA guidance and planning documents; and interviews with officials from EPA Headquarters and regional offices, 10 selected states, and the Association of State and Territorial Solid Waste Management Officials. Findings include: 1) At over 60 percent	GAO made the recommendation that EPA determine the extent to which EPA will consider vapor intrusion as part of the NPL listing process and how this will affect the number of sites listed in the future.

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	costs. http://www.gao.gov/new.items/d10857t.pdf	of the 239 nonfederal NPL sites with unacceptable or unknown human exposure, all or more than half of the work remains to complete the remedial construction phase of cleanup. 2) EPA's future costs to conduct remedial construction at nonfederal NPL sites will likely exceed recent funding levels. 3) EPA allocates funds separately for preconstruction activities (such as remedial investigation and remedial design) and remedial activities. EPA Headquarters allocates funds for preconstruction activities to EPA regional offices for them to distribute among sites. For remedial actions, Headquarters works in consultation with the regions to allocate funds to sites. 4) 4. EPA regional officials estimated that from 101 to	

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		125 sites (about 20 to 25 sites per year) will be added to the NPL over the next 5 years, which is higher than the average of about 16 sites per year listed for fiscal years 2005 to 2009.	
3	**EPA Activities Provide Limited Assurance of the Extent of Contamination and Risk at a North Carolina Hazardous Waste Site**/EPA OIG/The objective was to evaluate if EPA assessment of drinking water and air quality at the Mills Gap site assures the safety of drinking water and air quality in the area. http://www.epa.gov/oig/reports/2010/20100517-10-P-0130.pdf	The IG determined that the water and air quality sampling conducted at the Mills Gap site has provided limited assurance of the extent of water and air contamination and risk at the site. The IG indicated that the limited scope of EPA Region 4's past sampling activities and oversight kept the region from detecting ground water contamination in drinking water wells. Region 4 adhered to accepted standards and practices in conducting its 2007 to 2008 air sampling. However, the IG determined that an ineffective response action has not addressed the potential air quality risk that remains.	The IG recommended that Region 4 develop a plan for site transition to the state, clarify resident communications, update the Community Involvement Plan, and improve recordkeeping.
3	**EPA's Office of Research and Development (ORD) Performance Measures Need Improvement**/EPA OIG/The objective was to evaluate whether one of EPA's research programs—the Land Research	The IG found that no single measure can adequately capture all elements of research sources, but also that improvements were needed to better enable	The IG recommended that the Assistant Administrator for Research and Development 1) develop measures linked to the short-

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	Program (LRP) has appropriate performance measures for assessing the effectiveness of its research products. http://www.epa.gov/oig/reports/2010/20100804-10-P-0176.pdf	ORD to assess the effectiveness of its LRP research products.	term outcomes in LRP's Multi-Year Plan; 2) augment LRP's citation analysis with measures meaningful to ORD program managers and linked to LRP's goals and objectives; 3) develop an implementation plan for the LRP client survey to ensure that LRP has a reliable method for assessing relevance (or develop a reliable alternative customer feedback mechanism); 4) provide appropriate performance measurement data to the Board of Scientific Counselors prior to full program reviews; and 5) revise its long-term goal rating guidance to the Board of Scientific Counselors for program reviews.
3	**Changes in Conditions at Wildcat Landfill Superfund Site in Delaware Call for Increased EPA Oversight; Independent Ground Water Sampling Generally Confirms EPA's Data at Wheeler Pit Superfund Site in Wisconsin; EPA Should Improve Oversight of Long-Term Monitoring at Bruin Lagoon Superfund Site in Pennsylvania**/EPA OIG/The objective was to evaluate EPA's	At the Wildcat Landfill Superfund site, the IG found that more sampling and EPA oversight are needed to ensure that the site remains safe for people and the environment based on planned future use. The IG's independent sampling results were generally consistent with EPA Region 3's	At the Wildcat Landfill Superfund site, the IG recommended that Region 3 modify its sampling and analysis approach to ensure proper testing of relevant contaminants, address contamination that exceeds ecological or human safety standards, and improve

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	long-term monitoring at Superfund sites deleted from the NPL to ensure validity and reliability of data used to assess the conditions of these sites. http://www.epa.gov/oig/reports/2010/20100126-10-P-0055.pdf (Wildcat) http://www.epa.gov/oig/reports/2010/20100908-10-P-0217.pdf (Bruin Lagoon) http://www.epa.gov/oig/reports/2010/20100908-10-P-0218.pdf (Wheeler Pit)	historical results. However, surface waters at the site have a sheen that resembles petroleum. In December 2009, the region reported that it had detected petroleum at levels below public health standards and that it would continue to monitor petroleum levels at the site. At the Wheeler Pit Superfund site, the IG found that independent sampling results, with few exceptions, were consistent with the sampling results that EPA Region 5 has obtained historically. Among 135 contaminants that the OIG compared, eight were different from the region's results for some wells. The differences found among the eight contaminants do not have adverse implications for site protectiveness because there are either no applicable standards or the levels of the contaminants were below applicable standards. At the Bruin Lagoon Superfund Site, the IG found that EPA Region 3 did not collect ground water samples for six years, from 2001 to 2007. EPA Region 3 managers	oversight of site reuse plans. At the Wheeler Pit Superfund site, the IG recommended that EPA Region 5 conduct additional sampling on the residential well with excess Di(2-ethylhexyl) phthalate (DEHP) to verify the region's assertion that DEHP is originating from the sampling process. Regarding the Bruin Lagoon Superfund site, the IG recommended that the Region 3 Regional Administrator improve his oversight, correct data errors in the 2009 Five-Year Review, acknowledge the 2004 errors, and implement quality assurance procedures to ensure the accuracy of data included in Five-Year Review reports and used for site protectiveness decision-making.

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		informed the IG that the Agency made a deliberate, but undocumented, decision to not use oversight authority to require the state to conduct ground water sampling at the site. Long-term monitoring of the ground water is necessary to ensure that the remedial action remains protective of human health and the environment.	
3	**Lack of Final Guidance on Vapor Intrusion Impedes Efforts to Address Indoor Air Risks**/EPA OIG)/The objective was to evaluate what actions EPA has taken to identify and mitigate human health risks from chemical vapor intrusion that can be associated with contaminated sites. Where EPA has not taken site-specific action, the OIG examined why. http://www.epa.gov/oig/reports/2010/20091214-10-P-0042.pdf	The IG found that EPA's efforts to protect human health at sites where vapor intrusion risks may occur have been impeded by the lack of final Agency guidance on vapor intrusion risks. The IG also determined that EPA's 2002 draft vapor intrusion guidance has limited purpose and scope, and that the science and technology associated with evaluating and addressing risk from vapor intrusion is evolving. EPA's draft contains outdated toxicity values for assessing risk to humans from chemical vapors in indoor air.	The IG recommended that the Assistant Administrator for Solid Waste and Emergency Response issue final guidance to establish Agency policy on the evaluation and mitigation of vapor intrusion risk. The final guidance should incorporate: 1) Information on sustainable vapor intrusion mitigation, operation, and maintenance; the termination of the system; and when institutional controls and deed restrictions are appropriate. 2) A determination on when or if preemptive

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			mitigation is appropriate. 3) Recommendation (s) to use multiple lines of evidence in evaluating and making decisions about risks from vapor intrusion. 4) Instruction on how risks from petroleum hydrocarbon vapors should be addressed. 5) Final toxicity values for tetrachloroethylene and trichloroethylene—common contaminants associated with vapor intrusion. 6) Information on how the guidance applies to Superfund five-year reviews. The Agency should train EPA and state staff and managers and other parties on the final guidance document.
4	**General Scientific Analysis of Perchlorate**/EPA OIG/The objective was to conduct a scientific review of the risk assessment process and procedures used by EPA to develop and derive the perchlorate	The IG found that EPA continues to rely on the outdated single chemical risk assessment approach, originally developed in 1954, to characterize the risk posed by perchlorate,	The IG recommends that EPA conduct a cumulative risk assessment to reduce the uncertainty in characterizing the public health risk

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	reference dose. http://www.epa.gov/oig/reports/2010/20100419-10-P-0101.pdf	even though in 1997 EPA Administrator Carol Browner issued guidance directing EPA to embrace the cumulative risk assessment approach on all future major risk assessments. A cumulative risk assessment is the current state-of-the-art technique for evaluating the public health risk from multiple stressors. Over the last two decades, EPA has received numerous recommendations to improve environmental risk assessments.	posed by perchlorate.
4	**Need Continues for a Strategic Plan to Protect Children's Health**/EPA OIG/The objective was to evaluate the status of EPA's corrective actions taken in response to an OIG report issued in 2004. The IG initiated this evaluation to determine if EPA has developed a coordinated strategy to meet the National Agenda to Protect Children's Health from Environmental Threats and has defined the role and function of the Office of Children's Health Protection and Environmental Education (OCHPEE) within the Agency. http://www.epa.gov/oig/reports/2010/20100405-10-P-0095.pdf	The IG found that five years after providing the Office of Children's Health Protection (OCHP), now OCHPEE, with recommendations related to the strategic and annual planning processes, previously agreed-to corrective actions have not been completed by the Agency because of constant turnover in office directors. One office director claimed that corrective actions were completed prior to closing the recommendations.	The IG recommended that the EPA Deputy Administrator implement agreed-to corrective actions, which include developing a strategic plan, improving annual planning, establishing measures, and reporting results and outcomes toward meeting the Agency's National Agenda to Protect Children's Health from Environmental Threats, or that the Deputy Administrator devolve to other program offices the functions and resources of OCHPEE. The IG also recommended that the

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			Deputy Administrator verify that the current audit follow-up process is in compliance with EPA Manual 2750.
4	**EPA Needs a Coordinated Plan to Oversee Its Toxic Substances Control Act (TSCA) Responsibilities**/EPA, OIG/The objective was to assess EPA's implementation of TSCA, with a focus on evaluating EPA's policies, procedures, and authority for managing risks to human health and the environment posed by new chemicals. http://www.epa.gov/oig/reports/2010/20100217-10-P-0066.pdf	The IG found that EPA does not have integrated procedures in place to ensure that new chemicals entering commerce do not pose an unreasonable risk to human health and the environment. The IG also found that EPA's New Chemicals Program had limitations in three processes intended to identify and mitigate new risks: assessment, oversight, and transparency.	The IG recommended that EPA coordinate risk assessment and oversight activities by establishing a management plan containing goals and measures that demonstrate the results of the Office of Pollution Prevention and Toxic Substances (now the Office of Chemical Safety and Pollution Prevention [OCSPP]) and the Office of Enforcement and Compliance Assistance (OECA) actions. The IG also recommended that OCSPP establish criteria for selecting chemicals or classes of chemicals for low-level exposure and cumulative risk assessments and develop confidential business information classification criteria to improve EPA's transparency and information sharing. Finally, the IG recommended that OECA develop a management plan for

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			core TSCA enforcement that includes training, consistent enforcement strategies across regions for monitoring and inspection, and a list of manufacturers and importers of chemicals for strategic targeting.
4	**EPA Needs to Comply with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and Improve Its Oversight of Exported Never-Registered Pesticides**/EPA OIG/The objective was to evaluate whether the EPA has properly implemented FIFRA Section 17(a) with respect to the Foreign Purchaser Acknowledgement Statements, and whether controls are in place to ensure the safety of imported foods. http://www.epa.gov/oig/reports/2010/20091110-10-P-0026.pdf	The IG found that EPA does not comply with FIFRA Section 17(a) in notifying all countries importing unregistered pesticides that potentially hazardous pesticides were imported into that country. Furthermore, EPA does not ensure manufacturer compliance with FIFRA Section 17(a) notification requirements. Consequently, there is no assurance that EPA is receiving the entire universe of export notifications in any given year.	The IG recommended that the Assistant Administrator of the Office of Pollution Prevention and Toxic Substances (now OCSPP) comply with statutory mandates, implement management controls, and establish procedures for identifying and mitigating any dietary risk to consumers from never-registered pesticides.
5	**EPA Needs to Improve Continuity of Operation Planning**/EPA, OIG)/The objective was to determine how well EPA can accomplish its mission-essential functions in the event of a pandemic influenza or equivalent national emergency that necessitates Continuity of Operations (COOP) activation.	The IG found that EPA has limited assurance that it can successfully maintain continuity of operations and execute its mission-essential functions during a significant national event such as a pandemic influenza outbreak. EPA's COOP policy does	The IG recommended that the Assistant Administrator for Solid Waste and Emergency Response establish a schedule to complete FCD 1 requirements, designate a lead office for COOP planning, and identify

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	http://www.epa.gov/oig/reports/2010/20091027-10-P-0017.pdf	not clearly define authorities and responsibilities for continuity planning at all levels of the Agency, and the policy has not been updated to reflect current national directives and guidance. In addition, EPA lacks internal management controls, including guidance and systematic oversight, to ensure that regional offices have developed continuity plans that meet the requirements of Federal Continuity Directive 1 (FCD 1).	Headquarters and regional responsibilities and authorities. The OIG also recommended that EPA develop consistent mission-essential functions and COOP plan preparation and training guidance for all regions, and that EPA Headquarters should review and approve all regional and program office COOP plans.
5	**EPA Should Revise Outdated or Inconsistent EPA–State Clean Water Act Memoranda of Agreement**/EPA, OIG/The objective was to determine the degree to which CWA National Pollutant Discharge Elimination System (NPDES) MOAs between EPA and states comply with federal requirements, and whether MOAs impede EPA's ability to exercise consistent management controls and oversight of state enforcement activities. http://www.epa.gov/oig/reports/2010/20100914-10-P-0224.pdf	The IG found that NPDES MOAs between EPA and states impede Agency management of the NPDES program and equal protection to all Americans. EPA Headquarters does not hold EPA regional or state offices accountable for updating their MOAs and relies on other planning and management mechanisms to exercise control over state programs. However, MOAs are critical because they are the common denominator for state-authorized programs and should represent a common baseline of protection.	The IG recommended EPA ensure that all NPDES MOAs contain essential elements for a nationally consistent enforcement program, including CWA, Code of Federal Regulations, and State Review Framework criteria. The IG also recommended that EPA develop and provide a national template and/or guidance for a model MOA; direct EPA regions to revise outdated or inconsistent MOAs to meet the national template and standards; and establish a process for

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			periodic review and revision of MOAs, including when the CWA or Code of Federal Regulations are revised or when state programs change. Finally, the IG recommended that EPA establish a national public clearinghouse of all current MOAs so that EPA, states, and the public have access to these documents.
5	**An Assessment of the U.S. Environmental Protection Agency's National Environmental Performance Track Program**/RAND Corporation (EPA funded)/The purpose of the evaluation was to assess the conceptual basis of the National Environmental Performance Track program, a voluntary program administered by EPA between 2000 and 2009; its program design; and its implementation. http://www.rand.org/pubs/technical_reports/TR732/	The evaluation found that the Performance Track Program sought to improve the quality of the environment by encouraging facilities to recognize and improve all aspects of their environmental performance and by providing a range of benefits, including broad-based recognition, regulatory benefits, and a more open and collaborative relationship between facilities and their regulators. The evaluation found that Performance Track's concepts, design, and implementation had mixed success. While the report cited benefits, it also found deficiencies in the program's initial design that presented challenges during	The evaluation recommended that EPA should continue to experiment with voluntary programs, designing tightly focused ones; promote information sharing and networking among regulated entities; strive for complete, clear, and understandable program concepts, designs, and expectations; protect the EPA brand; independently evaluate key program elements; continue to try to change corporate culture to benefit the environment; and identify new ways to independently validate environmental performance.

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		implementation and hindered it from fully realizing stated goals.	
5	**Evaluation of the Effectiveness of an Ethanol Compliance Manual**/Ross & Associates Environmental Consulting, Ltd., under contract to Industrial Economics, Inc. (EPA funded)/The objective was to assess the effectiveness of EPA Region 7's compliance assistance manual for ethanol facilities, titled *Environmental Laws Applicable to Construction and Operation of Ethanol Plants*, in improving industry compliance with relevant rules and regulations and to gather information on the manual's readability, quality of information, and overall usefulness as a compliance assistance tool to ethanol facilities in the Region 7. In addition, the region wanted to identify ways to improve facility satisfaction with the manual as a compliance assistance tool and to determine what other compliance assistance tools and materials might be helpful to ethanol facilities. http://www.epa.gov/evaluate/pdf/ethanolrpt.pdf	Those interviewed and surveyed for the evaluation found the manual to be very useful. Despite extensive outreach efforts by Region 7, the evaluators determined that awareness of the manual among ethanol facilities and contractors could be increased. Participants in the evaluation found the manual to be well organized, easy to navigate, comprehensive, and an appropriate tool for conveying compliance information to facilities. Having this material, including appropriate contacts, organized in one place provided for an easy reference for facility managers. All of the facilities and contractors interviewed stated it was helpful for increasing or solidifying their understanding of environmental compliance requirements. However, due to the inability to know exactly when a facility reviewed the manual, the evaluation could not say conclusively that the	Based on the findings, the evaluators provided a number of recommendations for Region 7 to consider when making changes to the manual and conducting other sector outreach. To improve outreach to facilities and contractors, the evaluation recommended that Region 7 consider additional outreach strategies, such as conferences, EPA workshops, a more interactive website, and a biofuels-centric e-mail list, and that the region consider ethanol plant contractors as both an audience for the manual and as a communication conduit to the plants. In addition, as much of the content is relevant to all U.S. ethanol plants, Region 7 could consider ways to tailor content and distribute the manual nationally.

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		manual had an effect on industry compliance behaviors.	Transferring the manual to an interactive, Web-based format would improve access and the ability to keep it up-to-date for its audiences. Future versions of the manual could also include new relevant regulatory information; an executive summary; more "at a glance" information, such as lists of resources and checklists; more specific examples; and related regulatory information about topics of interest to ethanol plants, such as cellulosic ethanol production. Finally, the evaluators worked with Region 7 staff to identify options for applying lessons from this evaluation to the region's other compliance assistance and beyond compliance efforts. A first step toward carrying out these ideas would be to identify a small group in the region to explore strategic

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			and practical options for enhancing the region's other compliance assistance activities.
5	**ECHO Data Quality Audit–Phase 2 Results: EPA Could Achieve Data Quality Rate With Additional Improvements**/KPMG, LLP (EPA funded)/The objective was to assess the quality of key data elements reported through the Enforcement Compliance and History Online (ECHO) website. ECHO provides a single source of detailed compliance history of EPA-regulated facilities. EPA developed ECHO to provide the public with compliance and inspection data under its environmental programs, as well as demographic data of the surrounding areas. This report focuses on the quality of data elements entered into ECHO source systems: the legacy Permit Compliance System (PCS) and the newer Integrated Compliance Information System–National Pollutant Discharge Elimination System (ICIS–NPDES). The review focused on the more critical data elements, such as pollutant levels and facility status. This report is available at http://www.epa.gov/oig. The report is No. 10-P-0230.	EPA mandates that data elements reported to the public through the ECHO website have a 95 percent accuracy rate. KPMG found a 91.5 percent accuracy rate for key data elements entered into two primary ECHO source systems. Although the 91.5 percent data quality rate is close to EPA's goal, EPA and the state environmental offices could take additional steps to increase the quality of data reported through the ECHO website.	KPMG made several recommendations to the Assistant Administrator for Enforcement and Compliance Assurance. These included: 1) establishing an internal control structure to help manage the conversion of PCS to ICIS–NPDES; 2) including language in the National Program Manager Guidance requiring the use of the Environmental Information Exchange Network for reporting data to EPA; 3) developing a plan to share data quality best practices implemented at state environmental offices; 4) completing new rules requiring reporting ECHO data for minor facilities; and 5) reviewing procedures used to test ICIS–NPDES programming code before it is placed

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			into production.