



OFFICE OF INSPECTOR GENERAL

Semiannual Report to Congress

April 1, 2019–September 30, 2019

350-R-19-004
November 2019

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Inspector General Act of 1978, as amended

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Abbreviations

CSB	U.S. Chemical Safety and Hazard Investigation Board
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
OIG	Office of Inspector General
U.S.C.	United States Code
SES	Senior Executive Service

Are you aware of fraud, waste or abuse in an EPA or CSB program?

EPA Inspector General Hotline

1200 Pennsylvania Avenue, NW (2431T)
 Washington, D.C. 20460
 (888) 546-8740
 (202) 566-2599 (fax)
OIG_Hotline@epa.gov

Learn more about our [OIG Hotline](#).

EPA Office of Inspector General

1200 Pennsylvania Avenue, NW (2410T)
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 (202) 566-2391
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Message to Congress

The U.S. Environmental Protection Agency’s (EPA’s) Office of Inspector General (OIG) is pleased to present this semiannual report for the period ending September 30, 2019. Our investigative and audit activity was wide and deep—with accomplishments helping to “move the needle.” Besides our own judgment on where best to put our energies on behalf of the public and the agency, we considered congressional requests, hotline suggestions and thoughtful agency ideas.



Charles J. Sheehan

Office of Investigations Refocuses Efforts

During the reporting period, the EPA OIG’s Office of Investigations underwent new leadership and refocused its core mission to best align with its oversight role in investigating fraud, waste and abuse of agency programs and operations. The office implemented a staff realignment to enhance stakeholder outreach and relationship-building, and improve efficiency and effectiveness in its operations. The Office of Investigations also reset its priorities to target areas that will have the greatest return on investment: procurement and grant fraud, financial fraud, laboratory fraud, serious employee misconduct, and computer intrusion. The Office of Investigations stands fully poised to better serve the agency and taxpayer, and further the OIG’s goals and objectives.

Recent significant investigations are illustrative. For example, in August 2019, a federal contractor—ManTech Advanced Systems Internal Inc.—agreed to pay the U.S. government \$750,000 in a civil settlement, including \$325,000 in restitution to the EPA. ManTech had been awarded a subcontract that required certain tasks be performed only by individuals with Top-Secret clearances. However, ManTech’s principal project manager, who was required to maintain a Top-Security clearance, continued to work on the project despite that manager’s clearance having been revoked.

OIG Accomplishments (this reporting period and fiscal year 2019)

<ul style="list-style-type: none"> Questioned costs and potential monetary benefits (includes results from single audits) <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>\$2.65 million</td> </tr> <tr> <td>FY 2019:</td> <td>\$3.14 million</td> </tr> </table> 	April 1–September 30, 2019:	\$2.65 million	FY 2019:	\$3.14 million
April 1–September 30, 2019:	\$2.65 million			
FY 2019:	\$3.14 million			
<ul style="list-style-type: none"> Total fines and recoveries (includes EPA only and joint investigations) <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>\$1.09 million</td> </tr> <tr> <td>FY 2019:</td> <td>\$114.05 million</td> </tr> </table> 	April 1–September 30, 2019:	\$1.09 million	FY 2019:	\$114.05 million
April 1–September 30, 2019:	\$1.09 million			
FY 2019:	\$114.05 million			
<ul style="list-style-type: none"> Reports issued <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>33 reports</td> </tr> <tr> <td>FY 2019:</td> <td>46 reports</td> </tr> </table> 	April 1–September 30, 2019:	33 reports	FY 2019:	46 reports
April 1–September 30, 2019:	33 reports			
FY 2019:	46 reports			
<ul style="list-style-type: none"> Investigative cases closed <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>49 cases</td> </tr> <tr> <td>FY 2019:</td> <td>132 cases</td> </tr> </table> 	April 1–September 30, 2019:	49 cases	FY 2019:	132 cases
April 1–September 30, 2019:	49 cases			
FY 2019:	132 cases			
<ul style="list-style-type: none"> Administrative actions resulting from investigative cases <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>31 actions</td> </tr> <tr> <td>FY 2019:</td> <td>49 actions</td> </tr> </table> 	April 1–September 30, 2019:	31 actions	FY 2019:	49 actions
April 1–September 30, 2019:	31 actions			
FY 2019:	49 actions			
<ul style="list-style-type: none"> Hotline inquiries referred for action <table border="0"> <tr> <td>April 1–September 30, 2019:</td> <td>185 inquiries</td> </tr> <tr> <td>FY 2019:</td> <td>392 inquiries</td> </tr> </table> 	April 1–September 30, 2019:	185 inquiries	FY 2019:	392 inquiries
April 1–September 30, 2019:	185 inquiries			
FY 2019:	392 inquiries			

Spurred by our intense investigative legwork, the EPA’s Suspension and Debarment Program took 20 actions (10 suspensions and 10 debarments) against 11 individuals and three business entities. These actions debarred or suspended the individuals from participating in federal procurement and non-procurement programs ranging from 3 to 10 years and amounted to a total of 46 years. A 10-year debarment involved a former EPA employee who was convicted of obstructing an EPA OIG child pornography investigation. The former finance director for the Yukon River Inter-Tribal Watershed Council in Alaska and his company were debarred for 8 years from participation in federal procurement and non-procurement programs, and a council accountant was sentenced to 18 months in prison and ordered to pay \$40,604 in restitution for misapplying \$315,000 in EPA funds for his personal benefit.

On another front, we issued a management report after discovering that, for decades, a Senior Executive Service-level

EPA attorney had self-represented as having an active law license when the attorney's license had, in fact, been suspended. This situation occurred because the self-certification process for EPA attorneys was subject to abuse. As a result of our investigation, the agency issued new guidance that includes enhanced procedures for verifying an attorney's credentials.

Listening Sessions Initiated for Communities Near Contaminated Sites

To engage the American public and take direct feedback, the EPA OIG held a series of community listening sessions with residents living near contaminated sites regarding their concerns about potential human health risks. Risk communication frequently has come up as a challenge in the Superfund program. We decided that hearing from people most affected would be key. We held sessions in four communities, at which we offered the opportunity to speak, and also distributed written surveys. Participants expressed strong and differing opinions about the EPA's work—we heard from community members about where the EPA could do better and where it is doing a good job. All input from these sessions will be considered in final report findings and inform any recommendations on how the agency can improve its risk communication efforts.

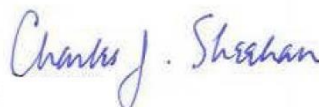
Audits Address Critical Issues

Based on numerous congressional requests and hotline complaints, we issued an audit report on the travel of former EPA Administrator Scott Pruitt and associated staff, including his security detail. Over a 10-month period, we identified 40 trips and \$985,037 in costs associated with Mr. Pruitt's travel. Of those 40 trips, 16 included travel to, or stops in, Tulsa, Oklahoma—the location of Mr. Pruitt's personal residence. We noted issues regarding first-class travel, use of noncontract air travel and lodging costs above per diem, and the approving and reporting of international travel. In another report, we found that the EPA does not have an effective strategy to implement and enforce the Lead Renovation, Repair and Painting Rule, which is intended to address hazards in disturbing lead-based paint in specific housing and child-occupied facilities.

We also issued two management alerts spotlighting issues needing immediate attention: one involving risk communication at the Amphenol/Franklin Power Products site in Franklin, Indiana, and the other involving inaccurate data related to releases of hazardous substances from Publicly Owned Treatment Works. In a review initiated as a result of a hotline complaint, we noted that EPA Region 5 needs to act on a transfer request and citizen petition regarding Ohio's Concentrated Animal Feeding Operation permit program that had been on hold for over 8 years. Another hotline review noted that the EPA did not implement key oversight activities regarding its Enterprise Customer Service Solution/Customer Relationship management system used to host its Frequently Asked Questions.

Note of Appreciation

This semiannual report marks the final achievement of Gary Sternberg, editor and teacher of editing and clear writing principles *par excellence* for the OIG, and long the guiding force behind this report. The only consolation in Gary's retirement is his having nurtured numerous OIG staff and managers to do well what he did so well over the some 20 years the office was fortunate to have him. All wish him the best.



Charles J. Sheehan
Acting Inspector General

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About EPA and Its Office of Inspector General

U.S. Environmental Protection Agency

The mission of the U.S. Environmental Protection Agency (EPA) is to protect human health and the environment. As America's steward for the environment since 1970, the EPA has endeavored to ensure that the public has air that is safe to breathe, water that is clean and safe to drink, food that is free from dangerous pesticide residues, and communities that are protected from toxic chemicals.

EPA Office of Inspector General

The Office of Inspector General (OIG), established by the Inspector General Act of 1978, as amended, 5 U.S.C. app., is an independent office of the EPA that detects and prevents fraud, waste and abuse to help the agency protect human health and the environment more efficiently and effectively. OIG staff are located at EPA headquarters in Washington, D.C.; the EPA's 10 regional offices; Research Triangle Park, North Carolina; and Cincinnati, Ohio. The EPA Inspector General also serves as the Inspector General for the U.S. Chemical Safety and Hazard Investigation Board (CSB). Our vision, mission and goals are as follows:

Vision

Be a premier oversight organization trusted to speak the truth, promote good governance, and contribute to improved human health and the environment.

Mission

Conduct independent audits, evaluations and investigations; make evidence-based recommendations to promote economy, efficiency and effectiveness; and prevent and detect fraud, waste, abuse, mismanagement and misconduct for the EPA and the CSB.

Goals

1. Contribute to improved EPA and CSB programs and operations protecting human health and the environment, and enhancing safety.
2. Conduct audits, evaluations and investigations that enable the EPA and the CSB to improve business practices and accountability.
3. Improve OIG processes, resource allocation and accountability to meet stakeholder needs.

Scoreboard of Results

The information below shows taxpayer return on investment for work performed by the EPA OIG during fiscal year (FY) 2019 compared to FY 2019 annual performance goal targets. All results reported are based on goals and plans established under the Government Performance and Results Act.

Note: A lapse in federal appropriations from December 22, 2018, to January 25, 2019, forced the OIG to suspend operations, delaying project progress during that time.

Annual Performance Goal 1: Environmental and business outcome actions taken; changes, corrections or improvements made; risks reduced, eliminated or influenced by OIG work	
Target: 196 Reported: 118 (60.20% of goal)	Supporting measures 8 Environmental/health improvements realized or influenced by OIG work 108 Environmental, chemical safety or business policy, practice or process change made, or decisions implemented 2 Legislative or regulatory changes
Annual Performance Goal 2: Recommendations, challenges, best practices or risks identified for action	
Target: 460 Reported: 862 (187.39% of goal)	Supporting measures *18 Certifications, verifications and validations *240 Recommendations for improvement (including risk identified) 6 Referrals for agency action *598 OIG-identified findings in external reports impacting EPA
Annual Performance Goal 3: Return on investment: potential dollar return as percentage of OIG budget	
Target: \$80,427,200 (160% of budget) Reported: \$314,010,598 (390.43% of target)	Supporting measures (in millions) OIG budget: \$50.3 Potential return: \$314.0 *\$0.840 Questioned costs \$2.298 Potential monetary benefits identified in reports—excluding questioned costs \$181.665 Monetary actions taken or resolved prior to report issuance \$15.845 Actual cost saved identified after report issuance \$0.529 Cost avoidance savings/cost savings identified after report issuance or based on investigative results \$1.175 Fines, penalties, settlements and restitutions resulting from EPA OIG investigations \$112.870 Fines, penalties, settlements and restitutions resulting from joint investigations between EPA OIG and other entities
Annual Performance Goal 4: Criminal, civil and administrative actions reducing risk, and loss of resources and operational integrity taken or influenced by OIG work	
Target: 200 Reported: 384 (192% of goal)	Supporting measures 191 Allegations disproved 5 Indictments, informations and complaints 6 Criminal convictions 3 Civil actions 27 Administrative actions taken (other than debarments or suspensions) 22 Suspension or debarment actions 130 Fraud briefings conducted
Other (no targets established)	
Savings and recommendations sustained: <ul style="list-style-type: none"> *167 sustained environmental or business recommendations (resolved or agreed-to) for action *\$0.042 million in sustained questioned costs \$2.298 million in sustained potential monetary benefits 	

Sources: The OIG Performance Measurement Results System and the Inspector General Enterprise Management System.

* These measures include single audits, which are audits of nonfederal entities performed by private firms.

FY 2019 EPA Management Challenges Issued

Report No. [19-N-0235](#), issued July 15, 2019

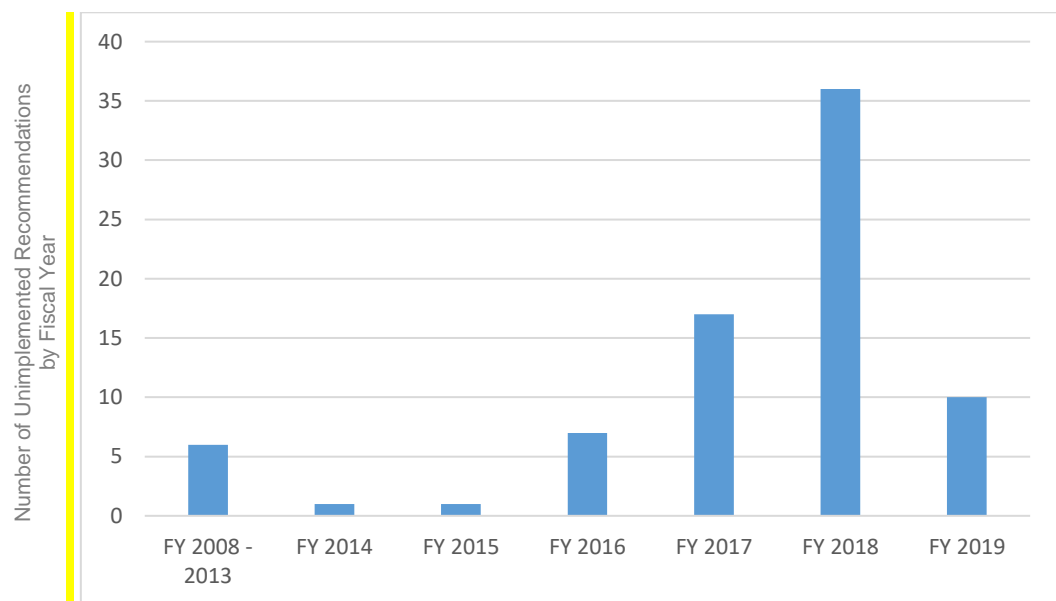
Attention to agency management challenges—areas with greater vulnerability to waste, fraud, abuse and mismanagement—could result in better protection for the public and increased confidence in management integrity and accountability. As required by the Reports Consolidation Act of 2000, the OIG identified the following issues as the EPA’s key management challenges for FY 2019; the first five were retained from the previous year’s report due to persistent issues that continue, while the last one is a new challenge:

- **The EPA Needs to Improve Oversight of States, Territories and Tribes Authorized to Accomplish Environmental Goals:** The EPA has made important progress, but our work continues to identify challenges throughout agency programs and regions, and many of our recommendations are still not fully implemented.
- **The EPA Needs to Improve Its Workload Analysis to Accomplish Its Mission Efficiently and Effectively:** The EPA needs to identify its workload needs so that it can more effectively prioritize and allocate limited resources to accomplish its work.
- **The EPA Needs to Enhance Information Security to Combat Cyber Threats:** Though the EPA continues to initiate actions to strengthen or improve its information security program, issues remain.
- **The EPA Needs to Improve on Fulfilling Mandated Reporting Requirements:** The agency faces challenges in tracking and submitting reports that are mandated by law and that contain key program information for Congress, the EPA Administrator and the public.
- **The EPA Needs Improved Data Quality and Should Fill Identified Data Gaps for Program Performance and Decision-Making:** Poor data quality negatively impacts the EPA’s effectiveness in overseeing programs that directly impact human health.
- **The EPA Needs to Improve Risk Communication to Provide Individuals and Communities with Sufficient Information to Make Informed Decisions to Protect Their Health and the Environment:** In 2018, the EPA Administrator identified risk communication as a top priority, and our recent reports indicate risk communication challenges across many EPA programs.

Status of OIG Unimplemented Recommendations

OIG audits provide recommendations to help improve EPA program offices and regions. Benefits for the agency and the public are realized through the implementation of these recommendations. To encourage continued progress on completing management action, we analyzed the list of unimplemented recommendations in Appendix 3 and provide the results of that analysis below. Unimplemented recommendations include those for which implementation is past due, as well as those that are due in the future.

Unimplemented Recommendations as of September 30, 2019
(presented by fiscal year issued)



For the semiannual reporting period ending September 30, 2019, the EPA cumulatively had 77 unimplemented recommendations and the CSB had one unimplemented recommendation. The potential monetary benefits of these recommendations are approximately \$68 million for the EPA and \$349,000 for the CSB.

The table below shows the status of the recommendations, which fall into six categories. The CSB report is included in the “Management and Operations” category.

Category	Total	
	No. of recommendations	Potential monetary benefits (in \$000s)
1. Management and Operations	34	\$37,501
2. Water Issues	5	0
3. Environmental Contamination and Cleanup	11	27,800
4. Toxics, Chemical Safety and Pesticides	9	0
5. Air Quality	14	2,905
6. Research and Laboratories	5	0
Total	78	\$68,206

For each category, we include the benefit(s) of implementing each recommendation as one or more of the following: (1) improved human health and the environment, (2) more effective and efficient operations, and (3) potential monetary benefits.

Category 1—Management and Operations

The 34 unimplemented recommendations in this category were issued within the following 14 reports and offer the potential for more effective and efficient operations, as well as potential monetary benefits of \$37.5 million:

- Improve oversight of:
 - Water Infrastructure Finance and Innovation Program internal controls (Report No. [19-P-0045](#)).
 - Law Enforcement Availability Pay controls processes (Report No. [19-P-0001](#)).
 - Assessment of threats to identify the proper level of protection for the EPA Administrator (Report No. [18-P-0239](#)).
 - Purchase Card and Convenience Check program controls to prevent improper purchases (Report No. [18-P-0232](#)). *The potential monetary benefit of this unimplemented recommendation is \$152,000.*
 - Operational efficiencies of the EPA’s human resources shared service centers (Report No. [18-P-0207](#)).
 - Companies with multiple cleanup liabilities that self-insure (Report No. [18-P-0059](#)).
 - Consolidated financial statements (Report Nos. [17-F-0046](#) and [16-F-0040](#)).
 - CSB future leasing with the General Services Administration (Report No. [16-P-0179](#)). *The potential monetary benefit of this unimplemented recommendation is \$349,000.*
 - Grants execution in the U.S. Virgin Islands (Report No. [15-P-0137](#)). *The potential monetary benefit of this unimplemented recommendation is \$37 million.*
 - Emergency and Rapid Response Contracts (Report No. [14-P-0109](#)).

- Institutionalize the Lean program to reap cost and time benefits (Report No. [17-P-0346](#)).
- Implement better processes for information technology regarding:
 - Individual Personal Identify Verification cards and access to computer equipment (Report No. [19-F-0003](#)).
 - Incident Tracking System controls to protect personal information (Report No. [18-P-0298](#)).

Category 2—Water Issues

The five unimplemented recommendations in this category were issued within the following three reports and offer the potential for improved human health and the environment, as well as more effective and efficient operations:

- Strengthen oversight of state drinking water programs to improve response to drinking water contamination emergencies such as in Flint, Michigan (Report No. [18-P-0221](#)).
- Provide leadership and better guidance to improve fish advisory risk communications (Report No. [17-P-0174](#)).
- Revise outdated or inconsistent EPA/state clean water memorandums of agreement (Report No. [10-P-0224](#)).

Category 3—Environmental Contamination and Cleanup

The 11 unimplemented recommendations in this category were issued within the following five reports and offer the potential for improved human health and the environment, more effective and efficient operations, and potential monetary benefits of \$27.8 million:

- Implement more efficient and effective methods to assess the impact of unregulated pollutants in land-applied biosolids (Report No. [19-P-0002](#)).
- Finish prioritization and resource allocation methodologies for abandoned uranium mine sites on or near Navajo lands (Report No. [18-P-0233](#)).
- Revise risk management inspection guidance to recommend minimum inspection scope and provide detailed examples of minimum reporting (Report No. [13-P-0178](#)).
- Improve management of the Oil Pollution Prevention program (Report No. [12-P-0253](#)).
- Make better use of Stringfellow Superfund Special Accounts (Report No. [08-P-0196](#)). *The potential monetary benefit of this unimplemented recommendation is \$27.8 million.*

Category 4—Toxics, Chemical Safety and Pesticides

The nine unimplemented recommendations in this category were issued within the following five reports and have the potential for improved human health and the environment:

- Improve measures and management controls over the pesticide emergency exemption process (Report No. [18-P-0281](#)).
- Implement controls over the use of unverified results within the Presidential Green Chemistry Challenge Awards program (Report No. [18-P-0222](#)).
- Better manage state pesticide cooperative agreements to more effectively use funds and reduce risk of pesticide misuse (Report No. [18-P-0079](#)).
- Reduce risks from illegal pesticides by effectively identifying imports for inspection and sampling (Report No. [17-P-0412](#)).
- Manage pesticide funds more efficiently (Report No. [17-P-0395](#)).

Category 5—Air Quality

The 14 unimplemented recommendations in this category were issued within the following six reports and have the potential for improved human health and the environment, as well as potential monetary benefits of \$2.9 million:

- Collect additional performance data from states to better assess the effectiveness of vehicle inspection and maintenance programs (Report No. [18-P-0283](#)).
- Strengthen the process for revising air quality dispersion models that predict impact of pollutant emissions (Report No. [18-P-0241](#)).
- Improve controls to address strategic risks in the light-duty vehicle compliance program and achieve compliance with mobile source regulations (Report No. [18-P-0181](#)).
- Improve data and oversight to assure compliance with the standards for benzene content in gasoline (Report No. [17-P-0249](#)).
- Meet certain statutory requirements to identify environmental impacts of the Renewable Fuel Standard (Report No. [16-P-0275](#)).
- Provide a verifiable and enforceable remedy to reduce diesel emissions in the Baton Rouge ozone nonattainment area (Report No. [13-R-0297](#)). *The potential monetary benefit of this unimplemented recommendation is \$2.9 million.*

Category 6—Research and Laboratories

The five unimplemented recommendations in this category were issued within the following two reports and have the potential for improved human health and the environment, as well as more effective and efficient operations:

- Develop a comprehensive vision and strategy for citizen science that aligns with the agency’s strategic objectives on public participation (Report No. [18-P-0240](#)).
- Review the Community-Focused Exposure and Risk Screening Tool and develop an action plan with time frames to address issues identified, including considerations on whether to retain the tool (Report No. [17-P-0378](#)).

EPA OIG Implements Listening Sessions to Obtain Community Input

The EPA OIG conducted a series of listening sessions to solicit input from community members regarding the EPA's communication with residents about potential health risks at contaminated sites. The listening sessions were held in nearby communities for four sites:

- Anaconda Co. Smelter Site, Anaconda, Montana.
- USS Lead Site, East Chicago, Indiana.
- Coakley Landfill Site, North Hampton, New Hampshire.
- Amphenol/Franklin Power Products Site, Franklin, Indiana.



The EPA OIG team makes a presentation at the listening session for the Coakley Landfill Site, North Hampton, New Hampshire. (EPA OIG photo)

In addition, a team of OIG auditors, evaluators and public affairs specialists visited the contaminated sites, toured the communities, and met with local leaders and community groups.

Risk communication has frequently come up as a challenge for the EPA, including the Superfund and Resource Conservation and Recovery Act programs. The listening sessions were part of a nationwide audit of the agency's communication of sampling results or other indicators of human health risk at select sites in Office of Land and Emergency Management programs. The ongoing audit includes eight sites, of which the OIG visited the four sites noted above plus a tribal community. Generally, between 35 and 50 members of the public attended each session.

Of note, during the course of the listening sessions, the OIG discovered that the EPA's [Cleanups in My Community](#) public website did not depict the most up-to-date risk information for the Amphenol site in Franklin. We issued a management alert report (Report No. [19-N-0217](#)) on June 27, 2019, to notify the agency. Our full report on risk communication is currently being developed.



The EPA OIG team obtains input at the listening session for the USS Lead Site, East Chicago, Indiana. (EPA OIG photo)

Furthering EPA's Efforts

When conducting our audit work during the second half of FY 2019, we considered the EPA's key areas of effort. The table below shows how our reports on the EPA aligned with these areas.

OIG-Issued Reports — Linkage to Key EPA Areas of Effort

OIG Report	Report No.	Improving air quality	Ensuring clean/safe water	Cleaning up/ revitalizing land	Ensuring safety of chemicals	Improving EPA research programs	Compliance with the law	Partnering with states/ others	Operating efficiently/ effectively
Management Alert: Certain Toxic Release Inventory Data Disclosed to the Public Are Inaccurate	19-N-0115				X				
Regional Research Programs Address Agency Needs but Could Benefit from Enhanced Project Tracking	19-P-0123					X			
Corrective Actions and Additional Guidance Have Improved EPA's Fiscal Responsibility over Superfund Interagency Agreements	19-P-0146								X
EPA Region 5 Needs to Act on Transfer Request and Petition Regarding Ohio's Concentrated Animal Feeding Operation Permit Program	19-N-0154				X				
Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel	19-P-0155						X		X
EPA Overpaid Invoices Due to Insufficient Contract Management Controls	19-P-0157								X
Insufficient Practices for Managing Known Security Weaknesses and System Settings Weaken EPA's Ability to Combat Cyber Threats	19-P-0158						X		X
EPA Complied with Improper Payments Legislation but Stronger Internal Controls Are Needed	19-P-0163						X		
EPA Demonstrates Effective Controls for Its On-Road Heavy-Duty Vehicle Compliance Program; Further Improvements Could Be Made	19-P-0168	X					X		
Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2018	19-N-0167								
Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRA Systems Need Improvement	19-P-0195				X				X
EPA Needs to Improve Oversight of the Senior Environmental Employment Program	19-P-0198								X
EPA Complied with Applicable Laws and Rules for the July 2017 Superfund Task Force Report but Could Improve Transparency	19-P-0201								X
EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance	19-P-0207	X							
Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	19-F-0214								X

OIG Report	Report No.	Improving air quality	Ensuring clean/safe water	Cleaning up/ revitalizing land	Ensuring safety of chemicals	Improving EPA research programs	Compliance with the law	Partnering with states/ others	Operating efficiently/ effectively
Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticide Registration Fund	19-F-0215								X
Management Alert: Certain Risk Communication Information for Community Not Up to Date for Amphenol/Franklin Power Products Site in Franklin, Indiana	19-N-0217			X					
EPA's Fiscal Year 2019 Management Challenges	19-N-0235	X	X	X	X	X	X	X	X
EPA Region 6 Quickly Assessed Water Infrastructure after Hurricane Harvey but Can Improve Emergency Outreach to Disadvantaged Communities	19-P-0236		X					X	X
More Effective EPA Oversight Is Needed for Particulate Matter Emissions Compliance Testing	19-P-0251	X							
EPA's 2017 Glider Vehicle Testing Complied with Standard Practices	19-P-0252	X					X		
EPA Exceeded the Deregulatory Goals of Executive Order 13771	19-P-0267						X		
EPA Needs to Determine Strategies and Level of Support for Overseeing State Managed Pollinator Protection Plans	19-P-0275				X				
EPA Office of Research and Development Needs to Address Barriers to Gathering External Feedback	19-P-0277					X			
EPA Oversight over Enterprise Customer Service Solution Needs Improvement	19-P-0278								X
EPA's Use of Administratively Determined Positions is Consistent with Its Authority Under the Safe Drinking Water Act	19-P-0279						X		X
Follow-Up Audit: EPA Took Steps to Improve Records Management	19-P-0283								X
EPA Not Effectively Implementing the Lead-Based Paint, Renovation, Repair and Painting Rule	19-P-0302				X				
Risk Assessment Determines that Travel Card Program Merits an Audit Next Year Because Internal Controls Not Adequate	19-P-0307								X
EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health	19-P-0318		X				X		

Status of Whistleblower Retaliation and Interference with Independence

Whistleblower Retaliation

Section 5(a)(20) of the Inspector General Act of 1978, as amended, requires a detailed description of any instances of whistleblower retaliation noted by the EPA OIG. This requirement includes reporting information about an official found to have engaged in retaliation and the consequences the agency imposed to hold that official accountable. There were no whistleblower retaliation cases closed within the semiannual period ending September 30, 2019. No officials were found to have engaged in retaliation.

Interference with Independence

Section 5(a)(21) of the Inspector General Act of 1978, as amended, requires a detailed description of any attempt by the establishment to interfere with the independence of the EPA OIG. This description includes budget constraints designed to limit the OIG's capabilities, as well as incidents where the agency resisted OIG oversight or delayed OIG access to information. Generally, we will defer reporting incidents of delayed access to information experienced in an ongoing audit or investigation until the semiannual period report in which the audit or investigation closed. (The actual audit or investigation may, when issued prior to the end of the semiannual period, report any interference with OIG independence.) There were no reportable attempts by the EPA to interfere with the OIG's independence within the semiannual period ending September 30, 2019.

Significant OIG Activity

Congressionally Requested Activities

Reports

Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel

Report No. [19-P-0155](#), issued May 16, 2019

The OIG identified 40 trips and \$985,037 in costs associated with the travel of former EPA Administrator Scott Pruitt for the 10-month period from March 1, 2017, to December 31, 2017.

A [podcast](#) on the Administrator's travel report is available.

This time frame covered 34 completed and six canceled trips and included costs incurred not only by Pruitt but by his Protective Service Detail and other staff. Of the 40 trips, 16 included travel to, or had stops in, Tulsa, Oklahoma—the location of Pruitt's personal residence. We estimated excessive costs of \$123,942 regarding the former Administrator's and accompanying Protective Service Detail agents' use of first/business-class travel, which was authorized without sufficient justification to support the security concerns that the agency claimed necessitated such travel. We also noted issues regarding granting first/business-class exceptions, use of noncontract air carriers, approval of lodging costs above per diem, and approving and reporting of international travel. Ten of our 14 recommendations, including a recommendation to recover the \$123,942 and others to improve controls to prevent future inappropriate actions, were unresolved.

Total costs incurred for all travel

Trip type	No. trips	Former Administrator	Staff	Protective Service Detail	Other*	Totals
Trips Taken:						
Domestic	32	\$85,131	\$203,443	\$301,865	\$65,692	\$656,131
International	2	26,629	91,544	67,962	36,069	222,205
Subtotal	34	\$111,761	\$294,987	\$369,827	\$101,761	\$878,336
Canceled:						
Domestic	4	\$731	\$3,633	\$4,179	-	\$8,543
International	2	1,995	41,273	54,889	-	98,158
Subtotal	6	\$2,726	\$44,907	\$59,069	-	\$106,701
% for canceled trips**		2.6%	42.1%	55.4%		100%
Total	40	\$114,487	\$339,894	\$428,896	\$101,761	\$985,037
% of Total		11.6%	34.5%	43.5%	10.3%	100%

Source: OIG analysis of travel data from the EPA's Compass Data Warehouse.

Note: Numbers in italics slightly off due to rounding.

* Other costs represent military and chartered flight costs.

** Costs for each category (Former Administrator, Staff, Protective Service Detail, Other) as a percentage of total costs for all canceled trips.

EPA's 2017 Glider Vehicle Testing Complied with Standard Practices

Report No. [19-P-0252](#), issued July 31, 2019

In response to two congressional requests, we conducted an audit to examine the selection, acquisition and testing of glider vehicles at the EPA's National Vehicle and Fuel Emissions Laboratory, as well as the EPA's planning for this testing. A glider vehicle is a truck that uses a previously owned powertrain (including the engine, transmission and usually the rear axle) but has new body parts. We found that the EPA's



The back of a heavy-duty chassis dynamometer used for testing glider vehicles. (EPA OIG photo)

selection and testing of the donated glider vehicles in 2017 were consistent with Clean Air Act authority, standard EPA practices, and relevant policies and procedures. Also, we confirmed that necessary approvals for testing were obtained, and we found no evidence that documentation was deleted or that ethics restrictions were violated. We did note that the EPA did not fully adhere to its delegation of authority related to the acceptance of donated property, and more direction was needed on soliciting and accepting donations. The EPA agreed to take sufficient corrective actions on the recommendations made.

Follow-Up Audit: EPA Took Steps to Improve Records Management

Report No. [19-P-0283](#), issued August 27, 2019

The EPA completed all corrective actions for 13 past audit recommendations from three prior OIG reports related to the agency's records management and Freedom of Information Act practices. Actions taken involved issuing an agencywide Freedom of Information Act policy and procedure. The agency agreed with our new recommendation that the General Counsel update the Freedom of Information Act policy and procedure to reflect some 2016 statute changes.

Briefings, Requests and Inquiries

During this reporting period, the OIG provided eight briefings to Congress on the OIG's work. Specific ongoing OIG work receiving considerable congressional interest included projects related to former Administrator Pruitt's and associated staff's travel and our audit examining the selection, acquisition and testing of glider vehicles at the EPA's National Vehicle and Fuel Emissions Laboratory. During the reporting period, the OIG also received nine congressional requests.

Human Health and Environmental Issues

EPA Not Effectively Implementing the Lead-Based Paint Renovation, Repair and Painting Rule

Report No. [19-P-0302](#), issued September 9, 2019



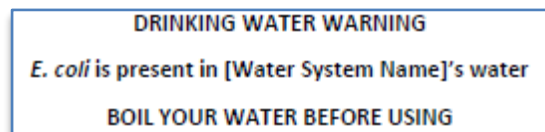
House with lead paint undergoing renovation. (EPA photo)

We found that the EPA did not have an effective strategy to implement and enforce the Lead Renovation, Repair and Painting Rule, intended to address hazards associated with the disturbing of lead-based paint in specific housing and child-occupied facilities. To adequately determine whether the program is meeting its intended purpose, the agency should update the current program guidance, establish oversight controls, and establish a forum for the regions to share best practices. Also, coordination and communication must be improved between the Office of Chemical Safety and Pollution Prevention and the Office of Enforcement and Compliance Assurance, the two program offices tasked with overseeing the lead rule program. Of our six recommendations, two are resolved with corrective actions pending and four are unresolved.

EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health

Report No. [19-P-0318](#), issued September 25, 2019

Forty-nine states, five territories and the Navajo Nation are responsible for overseeing whether public water systems meet federal requirements, including providing consumers with public notice of certain situations regarding their drinking water. Elsewhere, EPA regions have these oversight responsibilities. We found that some EPA regions and states did not fulfill their public notice responsibilities. Specifically, some did not consistently record



Part of an EPA public notice template for where *E. coli* bacteria were found in a water supply.

violations, and some did not track the need for the issuance of public notices. As a result, the EPA does not have complete information on public water system compliance with public notice requirements. Without reliable information, consumers cannot make informed health decisions, and the EPA cannot provide effective oversight. Of our nine recommendations, the agency agreed with six and three are unresolved.

Promising Practice:

Online Tool for Generating Public Notices

In Colorado, public water systems can use an [online tool](#) to generate notices that comply with public notice regulations. Colorado also created an online video that assists public water systems in using this tool.

Management Alert: Certain Risk Communication Information for Community Not Up to Date for Amphenol/Franklin Power Products Site in Franklin, Indiana

Report No. [19-N-0217](#), issued June 27, 2019

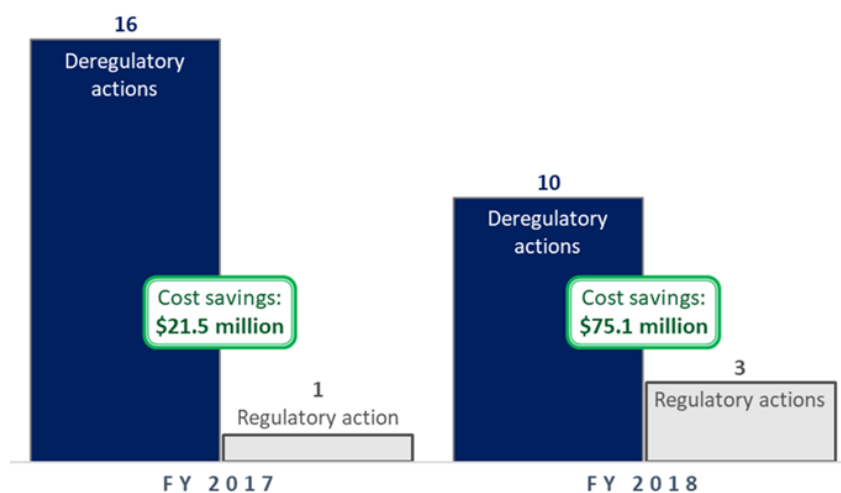
We issued a management alert informing the EPA that the [Cleanups in My Community](#) public website was not depicting the most up-to-date risk information for the Amphenol/Franklin Power Products site in Franklin, Indiana. Milestones on the EPA’s website show both the human health exposure and contaminated groundwater migration as “controlled” when EPA officials had information since 2018 that they should no longer be identified as such. The EPA should convey the most accurate, reliable and up-to-date information on matters related to public health.

The purpose of the [Cleanups in My Community](#) website is to put all cleanup information in one place and provide easy access, a better understanding, and improved analysis of sites in one’s community.

EPA Exceeded the Deregulatory Goals of Executive Order 13771

Report No. [19-P-0267](#), issued August 9, 2019

In FYs 2017 and 2018, the EPA exceeded deregulatory expectations and savings goals under Executive Order 13771. The order, issued January 30, 2017, requires agencies to eliminate two regulations for every new one issued. However, the agency did not develop internal guidance or management goals to implement the executive order, relying on guidance from the Office of Management and Budget. We recommended that the EPA enhance transparency in the decision-making process and reach out to stakeholders. The agency either disagreed with our recommendations or did not provide sufficient corrective actions; thus, and all recommendations remain unresolved.



EPA Region 6 Quickly Assessed Water Infrastructure after Hurricane Harvey but Can Improve Emergency Outreach to Disadvantaged Communities

Report No. [19-P-0236](#), issued July 16, 2019

EPA Region 6, in coordination with the Texas Commission of Environmental Quality, successfully conducted reviews and on-site assessments of drinking water and wastewater facilities to determine and track their operational status in the aftermath of Hurricane Harvey. However, the EPA could improve its outreach to vulnerable communities. We made four recommendations related to environmental justice outreach, including preparing emergency-related materials in the prevalent languages of an impacted region. All four recommendations are resolved with corrective actions pending.

Availability of translated EPA information pamphlets after Hurricane Harvey

Pamphlet title	Spanish		Vietnamese	
	Online	Print	Online	Print
<i>Emergency Disinfection of Drinking Water</i>	Yes	Yes	No	Yes
<i>Private Wells - What to Do After a Flood</i>	No	No	No	Yes
<i>Septic Systems - What to Do After a Flood</i>	No	No	No	Yes

Source: OIG analysis of Region 6 emergency response website and pamphlets provided by region.

EPA Needs to Determine Strategies and Level of Support for Overseeing State Managed Pollinator Protection Plans

Report No. [19-P-0275](#), issued August 15, 2019

The EPA plays a supportive role in overseeing the development, implementation and measurement of the states' Managed



A honey bee hive. (U.S. Fish and Wildlife Service photo)

Pollinator Protection Plans. Managed pollinators are generally honey bees that beekeepers contract out to growers for their pollination services. Our audit found that the EPA does not have a strategy to evaluate the national impact of the plans or its support of states as they implement the plans. In addition, stakeholders were concerned that the EPA focuses on acute risks to managed pollinators and may limit efforts to address other concerns, such as chronic contact with pesticides and native pollinator protection activities. The agency agreed with our five recommendations and provided acceptable corrective actions.

A [podcast](#) on our report on Managed Pollinator Protection Plans is available.

Management Alert: Certain Toxic Release Inventory Data Disclosed to the Public Are Inaccurate

Report No. [19-N-0115](#), issued April 8, 2019

While conducting an audit of Toxic Release Inventory data, we decided to issue an immediate management alert informing the agency that the data pertaining to releases of hazardous substances from Publicly Owned Treatment Works were inaccurate. Such data

consist of information about toxic chemical releases and pollution prevention activities reported by industrial and federal facilities. As a result of the inaccuracies, the public was not receiving complete and timely information affecting human health.

EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance

Report No. [19-P-0207](#), issued June 27, 2019

The EPA's automated screening of facility-reported continuous emissions monitoring systems data worked as intended and was effective in verifying the quality of reported data. However, we found a small number of inaccuracies and inconsistencies in the data. The validity of reported data can only be fully established when the process is supplemented with on-site field



Stack testers performing a Relative Accuracy Test Audit. (EPA photo)

audits to verify that monitoring requirements were met, but the

EPA and states conducted a limited number of these audits. While the instances noted had no impact on whether the data met quality assurance requirements, inaccurate data could have a negative impact by providing inaccurate or misleading information. The EPA can prevent these problems by adding specific screening checks to its existing reporting software and by developing a streamlined field audit procedure that state and local agencies can use when conducting other on-site visits at facilities. The agency agreed with our recommended corrective actions.

Data from continuous emissions monitoring systems are used to determine whether sources, such as power plants, comply with emissions limits designed to improve air quality and achieve environmental and public health goals.

More Effective EPA Oversight Is Needed for Particulate Matter Emissions Compliance Testing

Report No. [19-P-0251](#), issued July 30, 2019

State and local agencies in Washington state did not always conduct effective oversight of stack tests gauging whether stationary sources of air emissions—such as refineries and power plants—complied with smokestack emission limits for particulate matter. These agencies did not always (1) review stack test reports to verify that EPA-approved test methods were followed, (2) require stack testers to submit adequate supporting documentation to assess data

Health impacts of exposure to particulate matter

According to the EPA, scientific studies have linked particle pollution exposure to various human health concerns, including:

- Premature death in people with heart or lung disease.
- Nonfatal heart attacks.
- Irregular heartbeat.
- Aggravated asthma.
- Decreased lung function.
- Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.

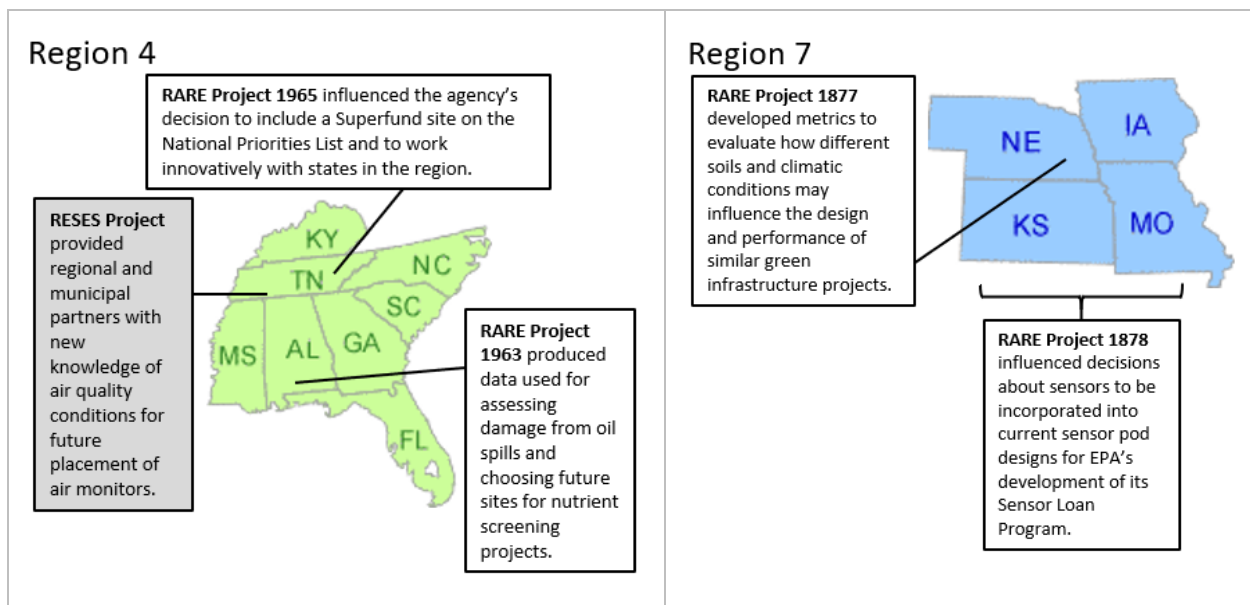
quality in the stack test reports, or (3) observe stack tests. Ineffective oversight could impact the reliability of the stack test results and the determination of whether a facility complies with its emission limits. The agency agreed with our recommendations and provided acceptable corrective actions.

Regional Research Programs Address Agency Needs but Could Benefit from Enhanced Project Tracking

Report No. [19-P-0123](#), issued April 18, 2019

The Office of Research and Development’s support of regional research programs helped EPA regions address high-priority research needs, positively impacting the EPA’s mission, operations and decision-making. The EPA could, however, better document the progress, outputs and impacts of individual projects, helping the agency to better document and communicate the benefits of its regional research programs overall. The agency agreed with our five recommendations and has already completed corrective actions for one.

Examples of how regional research projects impacted agency operations and decision-making



Source: OIG analysis of Office of Research and Development and regional data.

RARE: Regional Applied Research Effort *RESES*: Regional Sustainability and Environmental Sciences

EPA Office of Research and Development Needs to Address Barriers to Gathering External Feedback

Report No. [19-P-0277](#), issued August 19, 2019

The EPA Office of Research and Development faces a key barrier in that it is significantly limited in surveying non-federal external customers when collecting data to support its strategic measure regarding whether research products meet customer needs. Under the

Paperwork Reduction Act, the office cannot survey more than nine non-federal external customers without approval from the Office of Management and Budget. The Office of Research and Development is aware of this barrier and is developing an information collection request seeking permission from the Office of Management and Budget to survey more customers.

EPA Office of Research and Development criteria for meeting customer needs

Criteria	Description
Quality	The extent to which a research product meets scientific and technical standards, is rigorous and transparent, and advances the state of knowledge for a particular topic.
Usability	The degree to which a research product is suited for and easily applied to actions within EPA's mission.
Timeliness	Whether a product is delivered within a time frame appropriate for customer use.

Source: Office of Research and Development's strategic measures (May 4, 2018).

EPA Demonstrates Effective Controls for Its On-Road Heavy-Duty Vehicle Compliance Program; Further Improvements Could Be Made

Report No. [19-P-0168](#), issued June 3, 2019



Heavy-duty vehicles. (EPA OIG photos)

The internal controls within the EPA's heavy-duty vehicle compliance program are effective at detecting and preventing noncompliance. However, the agency should define measures to assess program performance; conduct a formal program risk assessment; and strengthen some existing controls, such as how compliance issues are tracked and referred for enforcement. Of our eight recommendations, the agency has completed two and has corrective actions underway for the remaining six.

EPA Complied with Applicable Laws and Rules for the July 2017 Superfund Task Force Report but Could Improve Transparency

Report No. [19-P-0201](#), issued June 24, 2019

The EPA created and preserved documentation on the Superfund Task Force in accordance with applicable requirements. In May 2017, the Administrator established the task force to provide recommendations for improving cleanups and promoting redevelopment, and the task force issued its report in July 2017. We concluded that experienced EPA staff prepared the report, and we found no instances of unsolicited influence from outside sources. We did find that the report could have been more transparent regarding the process used and the qualifications of the personnel involved. The agency agreed with our recommendation to publish additional task force information on its website.

Agency Business Practices and Accountability

Insufficient Practices for Managing Known Security Weaknesses and System Settings Weaken EPA’s Ability to Combat Cyber Threats

Report No. [19-P-0158](#), issued May 21, 2019

EPA personnel did not manage plans of action and milestones for remediating security weaknesses within the agency’s information security weakness tracking system as required. This happened because the office responsible for identifying vulnerabilities relies on other agency offices to enter the information in the tracking system. Missing plans of action and milestones data and incorrect security settings limit the EPA’s ability to manage enterprise risk and strengthen its security posture. Additionally, the EPA’s information security weakness tracking system lacked controls to prevent unauthorized changes to key data fields and to record these changes in the system’s audit logs. The agency agreed with all our recommendations and provided acceptable corrective actions.

A “plan of action and milestones” identifies tasks that need to be accomplished to remediate known weaknesses in an information system or program.

EPA Needs to Improve Oversight of the Senior Environmental Employment Program

Report No. [19-P-0198](#), issued June 24, 2019

The EPA needs to improve its oversight of cooperative agreements related to the Senior Environmental Employment program, which provides opportunities for workers at least 55 years old to assist the agency. The program is implemented through cooperative agreements with several organizations. Specifically, we found that the EPA did not timely comply with requirements to document program monitoring reviews, document oversight of grantee organizations’ quarterly reports, provide adequate communications on guidance, or update a 2010 pay scale for minimum and maximum hourly wages. The agency agreed to take the recommended corrective actions.

Senior Environmental Employment obligations and enrollees, FYs 2015–2017

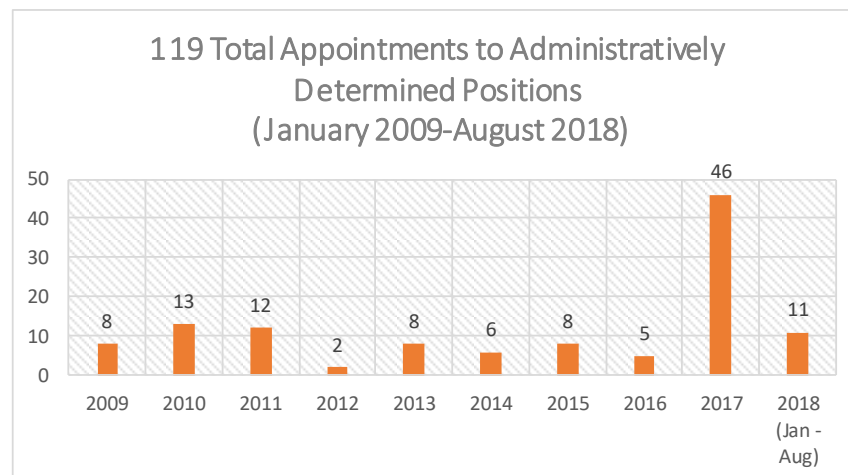
Obligations and enrollees	FY 2015	FY 2016	FY 2017
Obligated	\$50,621,126	\$41,934,566	\$43,497,241
Number of enrollees	1,111	1,061	972

Source: EPA Senior Environmental Employment program.

EPA's Use of Administratively Determined Positions Is Consistent with Its Authority Under the Safe Drinking Water Act

Report No. [19-P-0279](#), issued August 21, 2019

The agency's use of administratively determined positions is consistent with the authority provided by statute. Under the Safe Drinking Water Act, the Administrator can appoint personnel to fill not more than 30 scientific, engineering, professional, legal and administrative positions, referred to as *administratively determined positions*. Between January 2009 and August 2018, Administrators made 119 such appointments. We did identify a shift, beginning in 2017, to use such positions to facilitate the hiring of political appointees. However, because the Safe Drinking Water Act does not specify how administratively determined appointments are to be used, we made no recommendations.



Between January 2009 and August 2018, EPA Administrators have used the authority under the Safe Drinking Water Act to appoint 119 personnel to administratively determined positions. (EPA OIG image)

Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRIA Systems Need Improvement

Report No. [19-P-0195](#), issued June 21, 2019

The EPA has adequate controls over the posting of financial transactions related to pesticide registrations into the agency's accounting system. However, EPA staff manually post pesticide registration fee data from the agency's accounting system into the agency's pesticide registration information system, and the EPA needs to improve controls over that process to prevent errors. Also, the EPA needs to strengthen the security of its pesticide registration information system by remediating identified vulnerabilities and managing passwords, patches and user roles per EPA and federal standards. The agency already completed four of our seven recommendations, and corrective actions are pending for the remaining three recommendations.

OIG Renders Opinions for Two Pesticide Funds

The EPA receives funding from fees paid by pesticide manufacturers and amounts appropriated by Congress, and it deposits those monies in the Pesticides Reregistration and Expedited Processing Fund and the Pesticide Registration Fund. The OIG annually audits the financial statements for both funds, and for the FY 2017 statements for both funds we rendered modified opinions, meaning that, except for the possible effects of the agency's inability to support payroll accruals and related expenses for the funds in FY 2016, the FY 2017 statements were fairly presented. For the FY 2016 statements for both funds, we rendered disclaimers of opinion due to the aforementioned issues with payroll accruals and related expenses. Also, for the Pesticide Registration Fund, we found an internal control weakness regarding the EPA not retaining supporting documentation for \$369,779 in transactions. We did not find any internal control weaknesses for the other fund. The reports we issued are as follows:

- **Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticides Reregistration and Expedited Processing Fund**
Report No. [19-F-0214](#), issued June 28, 2019
- **Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticide Registration Fund**
Report No. [19-F-0215](#), issued June 28, 2019

EPA Complied with Improper Payments Legislation but Stronger Internal Controls Are Needed

Report No. [19-P-0163](#), issued May 31, 2019

The EPA complied with the Improper Payments Elimination and Recovery Act of 2010 in that it reported all required information on improper payments, but the EPA can improve the accuracy and completeness of the information. We believe that the improper payment amount reported for FY 2018 was understated because our review of 25 payments, totaling \$4,418,774, identified an additional \$1,912,275 in payments as improper due to insufficient, or a lack of, documentation. Improving processes for preventing and detecting improper payments will aid in the better use of funds for environmental and supporting programs. The agency agreed with our recommended corrective actions.

Risk Assessment Determines that Travel Card Program Merits an Audit Next Year Because Internal Controls Not Adequate

Report No. [19-P-0307](#), issued September 19, 2019

Our annual assessment of the EPA's travel card program determined that the risk for illegal, improper and erroneous purchases was high enough to warrant an audit in FY 2020. Sufficient oversight of internal controls was not established and put in place when the EPA transitioned from the SmartPay2 to SmartPay3 contract on November 30, 2018. The new online system was not working as intended. This report contains no recommendations.

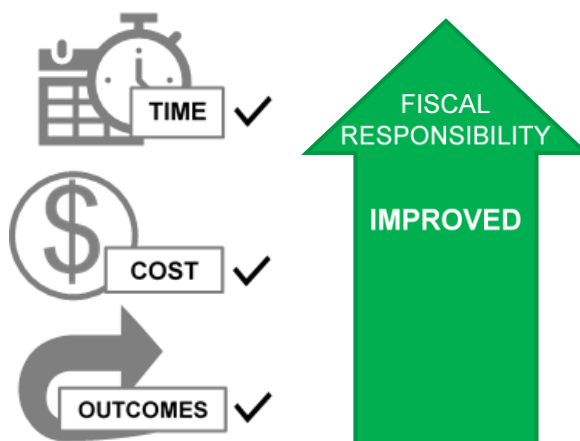


Sample government travel card. (Photo from U.S. General Services Administration)

Corrective Actions and Additional Guidance Have Improved EPA's Fiscal Responsibility over Superfund Interagency Agreements

Report No. [19-P-0146](#), issued May 7, 2019

The EPA improved its fiscal management over its more than \$3 billion in active interagency agreements with the U.S. Army Corps of Engineers for Superfund work. The agency completed all corrective actions in response to a 2007 audit of these interagency agreements. The EPA also issued additional guidance regarding the management of interagency agreements. Further, the EPA adequately documents justifications when awarding projects to the Army Corps of Engineers and effectively monitors these projects in terms of time, cost and outcomes. As a result, we made no recommendations.



By implementing effective controls over time, costs and outcomes, the EPA improved its fiscal responsibility over U.S. Army Corps of Engineers interagency agreements. (EPA OIG image)

Investigations

Management Implication Report

Management Implication Report Concerning the EPA's Process for Certifying that EPA Attorneys Possess an Active Bar Membership

Issued June 20, 2019

We issued a [management implication report](#) for a control issue we identified concerning how an Senior Executive Service (SES)-level EPA attorney had for decades self-represented as having an active law license when the attorney's license in fact had been suspended. Specifically, the attorney was hired by the EPA in 1979 and worked until retirement in 2017 even though the person's law license was suspended in 1985 and never reinstated. We determined that this happened because the annual self-certification process used by the EPA to ensure licensing compliance allowed attorneys to self-certify maintenance of an active law license by simply filling out a form. We notified the agency of this control weakness so that it could take whatever steps it deems necessary to correct the issue. In July 2019, in response to the OIG's report, the EPA issued new guidance addressing its process for annual attorney self-certification of active law licenses, which includes enhanced verification procedures.

Significant Investigations

Settlement Made with Contractor After Fraud Allegations

On August 15, 2019, ManTech Advanced Systems International Inc., a federal contractor, agreed to pay the U.S. government \$750,000 in a civil settlement, including \$325,000 returned to the EPA. The settlement was reached in a coordinated effort between the U.S. Attorney's Office for the Eastern District of Virginia and the OIG. ManTech was awarded a subcontract on an EPA contract that required certain tasks be performed only by individuals with a Top-Secret clearance. ManTech represented the principal project manager for the contract as having the required Top-Secret clearance. However, when the ManTech project manager's clearance was revoked, ManTech failed to inform the EPA. In a proposal to extend ManTech's contract with the EPA, ManTech again represented that the same project manager had a Top-Secret clearance when the person did not. ManTech is in the process of implementing changes in its processes and controls to ensure that such a failure does not occur again. These include personnel changes, the creation of several new security-related roles, new or revised security protocols, security-related training, and consultation with industry experts on security matters.

Penalty Levied Against EPA Recipient for Lab Fraud

On August 16, 2019, the Arizona Department of Health Services levied a \$275,000 civil penalty against Xenco Laboratories, an environmental testing lab headquartered in Stafford, Texas. The Arizona Department of Health Services is an EPA grant recipient that licensed Xenco to perform drinking water testing in Arizona. The lab violated acceptable professional practices established by the EPA. Xenco manipulated quality control checks involving instrument calibration verification samples, quantitation limits, and recovery of surrogate compounds to make the analyses appear correct and reliable. In addition to the financial penalty, the Arizona Department of Health Services required Xenco to conduct quarterly third-party audits for up to 18 months, as well as send a letter to all the laboratory's Arizona customers who potentially had data affected by the inappropriate laboratory practices.

The investigation leading to these outcomes was conducted jointly by the EPA OIG, the Arizona Department of Health Services and the Arizona Office of the Attorney General.

Tribal Council Director Debarred After Being Sentenced for Theft

On September 13, 2019, David McGraw, former accountant and finance director for the Yukon River Inter-Tribal Watershed Council in Anchorage, Alaska, and his company, DKM Enterprises, LLC, were debarred for 8 years from participation in federal procurement and non-procurement programs. Earlier in 2019, McGraw had been sentenced in the U.S. District Court for the District of Alaska to 18 months' imprisonment and ordered to pay \$40,604 in restitution for theft and filing a false tax return. In 2018, McGraw was indicted for theft and money laundering associated with work he performed while employed by the council. Each fiscal year from 2010 through 2014, the council was awarded federal grant money in excess of \$1 million, and McGraw willfully misapplied a total of about \$315,000 of these funds for his personal benefit.

The investigation leading to these outcomes was conducted jointly by the EPA OIG, the Federal Bureau of Investigation, the National Science Foundation OIG and the Internal Revenue Service.

Man Sentenced to Jail for Disassembling Bridge Which Damaged EPA Water Monitors

On September 5, 2019, Kenneth Morrison of Indiana was sentenced in the U.S. District Court for the Northern District of Indiana to 2 years' imprisonment, followed by 2 years of supervised release, and ordered to pay over \$54,000 in restitution. In 2015, Morrison was arrested by the Indiana Department of Natural Resources Police Department for illegally disassembling a city rail bridge and stealing the scrap metal for resale. The disassembly of the bridge resulted in the collapse of the bridge into the Grand Calumet

River. The OIG investigation found that, as a result of the bridge collapse, several EPA-owned water monitors were damaged. In addition, the debris removal process delayed a \$12 million EPA dredging project. In 2018, Morrison was convicted of interstate transportation of stolen goods.

This investigation was conducted jointly with the EPA Criminal Investigation Division.

Former Contractor Pleads Guilty to Charge Related to Theft

On August 12, 2019, a former EPA contractor pleaded guilty in the Superior Court of the District of Columbia to a charge relating to the theft of multiple EPA-owned laptop computers. The theft of the laptops was discovered when inconsistencies were found during an inventory check. The individual was sentenced to 90 days in jail (which was suspended) and supervised release for 5 years and was ordered to pay \$15,100 in restitution.

This investigation was conducted jointly by the EPA OIG and the U.S. Department of Homeland Security's Federal Protective Service.

Former Contractor Pleads Guilty to Theft of Laptop

On May 24, 2019, a former EPA contractor pleaded guilty in the Superior Court for Pierce County, Washington, to the theft of an EPA laptop computer. The individual was subsequently sentenced to 304 days of suspended jail time, 30 days of home detention, 30 days of community service, 2 years of supervised release, and \$1,233 in restitution to the EPA. The laptop was reported missing from an EPA storage room following an inventory of equipment.

Reports of Investigation—Employee Integrity

A Report of Investigation documents the facts and findings of an OIG investigation and generally involves an employee integrity matter. When the OIG's Office of Investigations issues a Report of Investigation that has at least one "supported" allegation, it requests that the entity receiving the report—whether it is an office within the EPA or the CSB, or an office within the OIG—provide a notification to the OIG within 60 days regarding the administrative action taken or proposed to be taken in the matter. This section provides information on how many Reports of Investigation with at least one supported allegation were issued to the agency and/or to the OIG, and for how many of those Reports of Investigation a response was not received within a 60-day period.

For the reporting period ending September 30, 2019, the Office of Investigations issued six Reports of Investigation and received no responses outside the 60-day window for the six that were received:

Agency and OIG Reports of Investigation

No. of Reports of Investigation issued during reporting period with findings	Agency response* received after 60 days	Awaiting agency response	OIG response* received after 60 days	Awaiting OIG response
6	0	0	0	0

* Agency or the OIG will or will not take an action, or will conduct a supplemental investigation.

Hotline Activities

The Inspector General Act of 1978, as amended, requires each OIG to manage a hotline. The purpose of the hotline is to receive complaints of fraud, waste or abuse in EPA and CSB programs and operations, including mismanagement or violations of law, rules or regulations by agency employees or program participants. The hotline also encourages suggestions for assessing the efficiency and effectiveness of agency programs. Complaints and requests may be submitted by anyone, including EPA and CSB employees, participants in EPA and CSB programs, Congress, organizations, and the public. As a result of these contacts, the OIG may conduct audits, evaluations and investigations. Details on our work during the semiannual reporting period follow.

Audit Reports Initiated via OIG Hotline

EPA Region 5 Needs to Act on Transfer Request and Petition Regarding Ohio's Concentrated Animal Feeding Operation Permit Program

Report No. [19-N-0154](#), issued May 15, 2019

Our review regarding a hotline complaint found that EPA Region 5 had not made a decision regarding a request by Ohio to transfer the Concentrated Animal Feeding Operation portion of its National Pollutant Discharge Elimination System permit program



A dairy Concentrated Animal Feeding Operation. (EPA OIG photo)

from the Ohio Environmental Protection Agency to the Ohio Department of Agriculture. The complainants also petitioned EPA Region 5 to withdraw the Concentrated Animal Feeding Operation program from the Ohio Environmental Protection Agency's authority. Although EPA Region 5 began an informal investigation of allegations raised in a 2011 citizen petition to commence withdrawal proceedings, more than 8 years after the 2011 submission it still had not made a determination about the petition. Region 5 officials began to take corrective actions on our recommendations regarding making decisions.

EPA Overpaid Invoices Due to Insufficient Contract Management Controls

Report No. [19-P-0157](#), issued May 20, 2019

In response to an anonymous hotline complaint, we sought to determine whether the EPA's administration of Contract No. EP-W-11-019, Task Order 12, had effective controls. Although the contract, for information technology services, ended in 2017, it was still open and payments were being made. We found that management controls were insufficient. Required contractor reports were not finalized, there were no official

modifications for some changes, and periodic invoice reviews were not always performed. Our limited review noted \$5,158 in overbillings. The agency agreed to take all recommended corrective actions.

EPA Oversight over Enterprise Customer Service Solution Needs Improvement

Report No. [19-P-0278](#), issued August 19, 2019

As a result of an anonymous hotline complaint, we looked at how the EPA implemented an Enterprise Customer Service Solution/ Customer Relationship Management system used to host its Frequently Asked Questions and inquiries for the agency’s public website. We found that the EPA did not implement key oversight activities, including documenting the agency’s business justification, having the required plans, and doing a user satisfaction survey. Further, the system was not classified in the correct information technology investment category. Of our six recommendations, the agency agreed to take sufficient corrective actions for four of them, but the other two were unresolved.

A Customer Relationship Management application maintains a centralized view of all interactions and improves the outreach experience to those contacting and engaging with the EPA through various methods.

In addition to the reports in this section above, two congressionally requested reports included in our “Congressional Activities” section also involved hotline complaints:

- *Actions Needed to Strengthen Controls over the EPA Administrator’s and Associated Staff’s Travel*, Report No. [19-N-0155](#), issued May 16, 2019.
- *Follow-Up Audit: EPA Took Steps to Improve Records Management*, Report No. [19-P-0283](#), issued August 27, 2019.

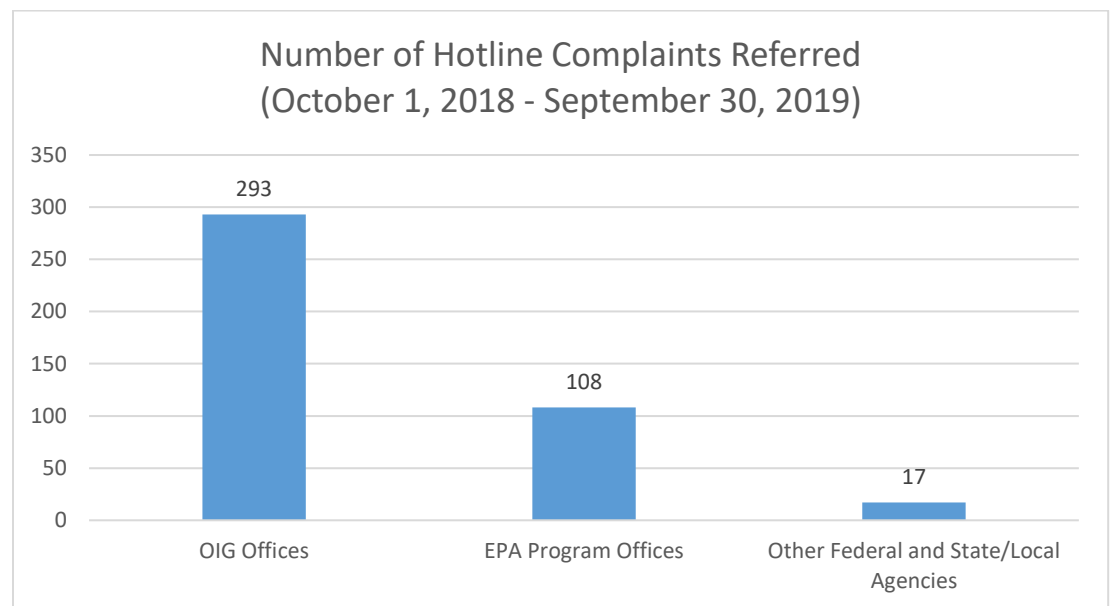
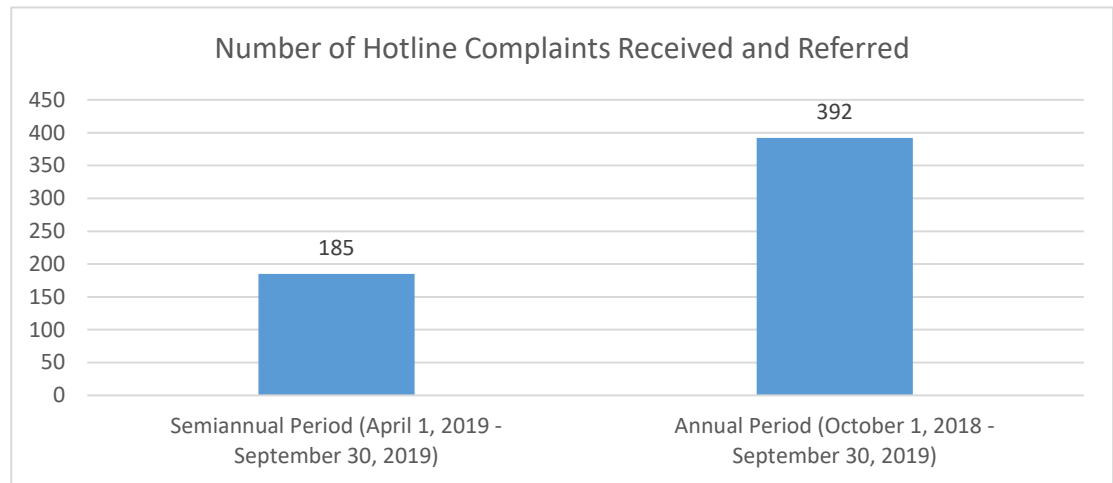
Significant Investigations Initiated via OIG Hotline

Former Employee Debarred Related to Child Pornography Charges

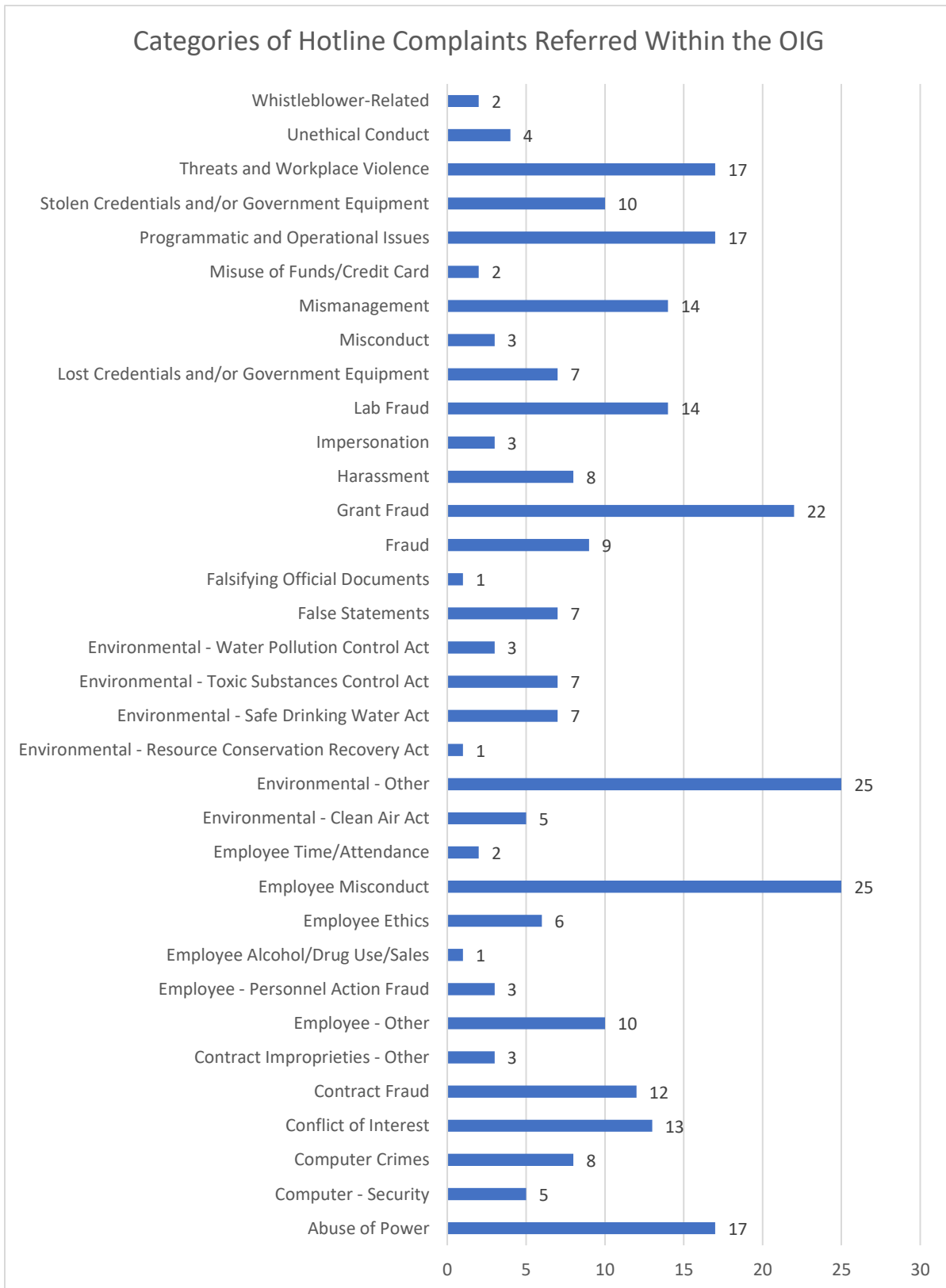
On July 11, 2019, a former EPA employee was debarred for 10 years from participation in federal procurement and non-procurement programs for obstructing an OIG child pornography investigation. In 2018, the former employee pleaded guilty to the charge and was sentenced in the U.S. District Court for the Northern District of Illinois to 38 months in prison followed by 3 years of supervised release. In 2016, the former employee was indicted for possession of child pornography, conversion of government property and obstructing justice. The EPA OIG investigation determined that the former employee had downloaded unauthorized software onto the employee’s EPA-issued laptop and deleted files relevant to the investigation.

Hotline Statistics

The OIG Hotline receives complaints of fraud, waste, abuse, mismanagement and misconduct in EPA and CSB programs and operations. The figures below detail the number and type of complaints that the hotline received and referred for review by OIG investigation and audit staff, EPA program offices, and other government agencies during the second half of FY 2019 and the complete FY 2019 period.



Note: Hotline complaints may be referred to more than one entity, so the total number of referrals may be higher than the total number of complaints.



Hotline Confidentiality

Individuals who contact the hotline are not required to identify themselves and may request confidentiality when submitting allegations. However, the OIG encourages those who report allegations to identify themselves so that they can be contacted if the OIG has additional questions. Pursuant to Section 7 of the Inspector General Act, the OIG will not disclose the identity of an EPA employee who provides information unless that employee consents or the Inspector General determines that such disclosure is unavoidable during the course of an investigation, audit or evaluation. As a matter of policy, the OIG will provide comparable protection to employees of contractors, grantees and others who provide information to the OIG and request confidentiality. Individuals concerned about the confidentiality or anonymity of electronic communication may submit allegations by telephone or U.S. mail.

EPA OIG Hotline

To report fraud, waste or abuse, contact us through one of the following methods:

email:	OIG_Hotline@epa.gov	write:	EPA OIG Hotline
phone:	888-546-8740 or 202-566-2476		1200 Pennsylvania Avenue, NW
fax:	202-566-0814		Mail Code 2431T
online:	EPA OIG Hotline		Washington, DC 20460

EPA Whistleblower Protection Coordinator

To contact the EPA Whistleblower Coordinator:

phone:	202-566-1513	online:	EPA Whistleblower Protection
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Other Activities

Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2018

Report No. [19-N-0167](#), issued June 4, 2019

The EPA OIG complied with generally accepted government auditing standards for audit assignments completed in FY 2018. However, the OIG needs to improve how it estimates and approves project time frames and cost estimates, which were issues identified in the prior year's Quality Assurance Review. When reports are not timely and current, their relevance and usefulness can be diminished. Also, the OIG needs to maintain personal impairment forms, which are evidence of its auditors' independence, for record-keeping purposes. OIG corrective actions included changes to our internal Project Management Handbook and more training for audit staff.

U.S. Chemical Safety and Hazard Investigation Board

The U.S. Chemical Safety and Hazard Investigation Board (CSB) was created by the Clean Air Act Amendments of 1990. The CSB's mission is to investigate accidental chemical releases at facilities, report to the public on the root causes and recommend measures to prevent future occurrences.



In FY 2004, Congress designated the EPA Inspector General to serve as the Inspector General for the CSB. As a result, the EPA OIG has the responsibility to audit, evaluate, inspect and investigate the CSB's programs and to review proposed laws and regulations to determine their potential impact on the CSB's programs and operations. Details on our work involving the CSB are available on the OIG's [webpage](#) about the CSB.

Fiscal Year 2019 U.S. Chemical Safety and Hazard Investigation Board Management Challenges

Report No. [19-N-0156](#), issued May 20, 2019

The five-member CSB had two vacancies as of May 2019, and if no new members are appointed by August 2020 the board's governing body will have no members and thus the CSB may not be able to complete its mission or meet its goals. The terms of the three current board members are set to expire in December 2019, February 2020 and August 2020. Because it took an average of 10.5 months to confirm the three current board members, action needs to be taken soon by the President and Senate to appoint and confirm new members. We noted an additional challenge in that the CSB has not sufficiently developed guidance on board member responsibilities.

CSB Audit Reports

CSB Still Needs to Improve Its "Incident Response" and "Identity and Access Management" Information Security Functions

Report No. [19-P-0147](#), issued May 9, 2019

We assessed the maturity of the CSB's information security program and determined that policies, procedures and strategies were established at a "Defined" level overall, meaning they were formalized and documented but not consistently implemented. However, we noted that the CSB's information security program needed improvements in Incident Response, where it had neither identified nor defined its processes for incident handling, and in Identity and Access Management, where it did not fully define or implement processes for the use of Personal Identity Verification cards for physical and logical

access. As a result, unauthorized access to agency systems could occur. The agency agreed to take the recommended corrective actions.

CSB Purchase Card Program at Low Risk for Unauthorized Purchases During Fiscal Year 2018

Report No. [19-P-0245](#), issued July 26, 2019

The CSB's purchase card program, through which the agency spent \$326,859 in FY 2018, is at low risk for unauthorized purchases. We reviewed a sample of 26 purchase card transactions and one convenience check transaction, and found that all were legitimate and adequately supported. We noted that in May 2018 the CSB increased its micro-purchase threshold, as allowed by statute, to \$10,000, and we advised the CSB to update Board Order 24 to reflect that policy change.

Other Results of OIG Work

Follow-Up Is Important Aspect of OIG Efforts

It is important for an OIG to follow up on certain previously issued reports to ensure that appropriate and effective corrective actions have been taken. The following reports issued during the semiannual reporting period ending September 30, 2019, involved follow-up on prior OIG reports.

Report no.	Report Title	Date
19-P-0307	Risk Assessment Determines that Travel Card Program Merits an Audit Next Year Because Internal Controls Not Adequate	September 19, 2019
19-P-0283	Follow-Up Audit: EPA Took Steps to Improve Records Management	August 27, 2019
19-P-0278	EPA Oversight over Enterprise Customer Service Solution Needs Improvement	August 19, 2019
19-P-0245	CSB Purchase Card Program at Low Risk for Unauthorized Purchases During Fiscal Year 2018	July 26, 2019
19-F-0215	Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticide Registration Fund	June 28, 2019
19-F-0214	Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	June 28, 2019
19-P-0168	EPA Demonstrates Effective Controls for Its On-Road Heavy-Duty Vehicle Compliance Program; Further Improvements Could Be Made	June 3, 2019
19-P-0163	EPA Complied with Improper Payments Legislation but Stronger Internal Controls Are Needed	May 31, 2019
19-P-0158	Insufficient Practices for Managing Known Security Weaknesses and System Settings Weaken EPA's Ability to Combat Cyber Threats	May 21, 2019
19-P-0147	CSB Still Needs to Improve Its "Incident Response" and "Identity and Access Management" Information Security Functions	May 9, 2019
19-P-0146	Corrective Actions and Additional Guidance Have Improved EPA's Fiscal Responsibility over Superfund Interagency Agreements	May 7, 2019

Single Audit Reporting Efforts Make Impact

In accordance with the Single Audit Act of 1984 and Office of Management and Budget guidance, nonfederal entities that expend more than \$750,000 in federal funds are required to have a comprehensive annual audit of their financial statements and compliance with major federal program requirements. The entities receiving the funds include states, local governments, tribes and nonprofit organizations. The act provides that grantees are to be subject to one annual comprehensive audit of all their federal programs versus a separate audit of each federal program, hence the term “single audit.” The audits are performed by private firms. Federal agencies rely upon the results of single audit reporting when performing their grants management oversight of these entities.

The OIG provides an important customer service to the EPA by performing technical reviews of single audit reports, and issues memorandums to the EPA for audit resolution and corrective action. These memorandums recommend that EPA action officials confirm corrective actions have been taken. If the corrective actions have not been implemented, the EPA needs to obtain a corrective action plan, with milestone dates, for addressing the findings in a single report. The following is a summary of single audit reporting actions during the semiannual reporting period ending September 30, 2019.

Summary of single audit activity in FY 2019

	April 1, 2019– September 30, 2019	Total for FY 2019
No. of single audit memorandums issued to EPA	185	283
No. of single audit findings reported to EPA	466	686
Questioned costs reported to EPA	\$611,733	\$710,723
No. of quality reviews of single audits reports done by OIG	3	4

Source: EPA OIG analysis.

The OIG also provides technical assistance and advice to the EPA, single auditors and others involved with the single audit process.

Agency Best Practices

During this semiannual reporting period, OIG reports highlighted agency best practices that have potential value and applicability to other components in the EPA or elsewhere:

- The EPA oversees its Managed Pollinator Protection Plan by helping states develop, implement and measure their own plans. The EPA worked with a subcommittee of the American Pesticide Control Officials Committee to provide guidance and outline best management practices for Managed Pollinator Protection Plan development. The subcommittee’s Final Guidance for State Lead Agencies for the Development and Implementation of Managed Pollinator Protection Plans includes numerous “critical elements” for states to consider while developing their plans. (Report No. [19-P-0275](#))
- Our report on EPA Region 6’s response to Hurricane Harvey noted that regional staff from the Office of Communities, Tribes, and Environmental Assessment conducted outreach to communities that may be vulnerable to future natural disasters. For instance, regional staff disseminated materials that described how to disinfect drinking water. We also noted that Region 6 held an environmental justice forum that included presentations from federal, state and local officials, and during these discussions Region 6 identified four recommendations for improving environmental justice outreach during disasters. (Report No. [19-P-0236](#))
- During our audit of the EPA Office of Research and Development’s support of regional research programs, we noted several effective practices applied by some Regional Science Councils that could be applied in other regions. For example, the Region 4 council’s charter includes a concise, one-page table describing each regional research program. The Region 7 council includes state and tribal partners. The Region 8 council has a robust intranet site and extensive resources, such as a form that helps connect regional scientists with headquarters staff doing similar work. (Report No. [19-P-0123](#))

In addition to these agency best practices, during our audit on whether the EPA adequately ensures that public drinking water systems notify the public per regulations authorized by the Safe Drinking Water Act, we found several promising practices applied by states. Specifically:

- Pennsylvania requires public water systems to consult with state officials within 1 hour of learning of a situation that will require public notice within 24 hours; this early coordination improves communication to consumers on actions they need to take.

- In Colorado, public water systems can use an [online tool](#) to generate notices that comply with public notice regulations. Colorado also created and posted online a video that assists public water systems in using this tool.
- The state of Washington translates four basic drinking water messages into 27 languages. By offering these translations [online](#), water systems in the state of Washington and across the country can readily use the statements in their public notices, increasing the likelihood that more of their consumers will receive important information about the quality of drinking water.

By applying these promising practices, other states can better protect their residents against human health risks presented by unsafe levels of contamination in drinking water. (Report No. [19-P-0318](#))

Statistical Data

Profile of Activities and Results

OIG audits (\$ in millions)		
	April 1, 2019, to September 30, 2019	FY 2019
Questioned costs	\$0.129	\$0.129
Potential monetary benefits *	\$1,912	\$2,298
Audit reports issued by OIG **	27	35

* Section 5(a)(22) requires detailed descriptions of the particular circumstances of each inspection, evaluation and audit conducted by the OIG that was closed and not publicly disclosed. There were no instances of inspections, evaluations or audits that were closed and not publicly disclosed during the semiannual period ending September 30, 2019. Investigations that were closed but not previously publicly disclosed are found in Appendix 4.

** Only includes performance and financial audits conducted in accordance with generally accepted government auditing standards. Appendix 1 lists all reports issued.

Investigative operations (\$ in millions)						
	April 1, 2019, to September 30, 2019			FY 2019		
	EPA OIG only	Joint*	Total	EPA OIG only	Joint*	Total
Total fines and recoveries	\$0.017	\$0.329	\$0.346	\$0.425	\$0.370	\$0.795
Cost savings	\$0.003	\$0.112	\$0.115	\$0.417	\$0.112	\$0.529
Civil settlements	\$0.750	\$0.000	\$0.750	\$0.750	\$112.500	\$113.250
Cases opened during period	42	8	50	82	14	96
Cases closed during period	36	13	49	104	28	132
Indictments/informations/complaints	2	0	2	3	2	5
Convictions	3	1	4	3	3	6
Civil judgments/settlements/filings	1	0	1	1	2	3

* With one or more federal agencies.

Audit Report Resolution

Table 1: OIG-issued reports with questioned costs for semiannual period ending September 30, 2019 (\$ in thousands)

Report category	No. of reports	Questioned costs *	Unsupported costs
A. For which no management decision was made by April 1, 2019 **	7	\$3,208	\$3,037
B. New reports issued during period	33	129	0
Subtotals (A + B)	40	\$3,337	\$3,037
C. For which a management decision was made during the reporting period:	32		
(i) Dollar value of disallowed costs		5	0
(ii) Dollar value of costs not disallowed		0	0
D. For which no management decision was made by September 30, 2019	8	\$3,332	\$3,037

* Questioned costs include unsupported costs.

** Any difference in number of reports and amounts of questioned costs between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

Table 2: OIG-issued reports with recommendations that funds be put to better use for semiannual period ending September 30, 2019 (\$ in thousands)

Report category	No. of reports	Dollar value
A. For which no management decision was made by April 1, 2019 *	7	\$3,208
B. New reports issued during the reporting period	33	2,041
Subtotals (A + B)	40	\$5,249
C. For which a management decision was made during the reporting period:	32	
(i) Dollar value of recommendations from reports that were agreed to by management		\$1,917
(ii) Dollar value of recommendations from reports that were not agreed to by management		0
D. For which no management decision was made by September 30, 2019	8	\$3,332

* Any difference in number of reports and amounts of funds put to better use between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

Summary of Investigative Results

Summary of investigative activity during reporting period

Cases open as of April 1, 2019*	141
Cases opened during period	50
Cases closed during period	49
Cases open as of September 30, 2019	142
Complaints open as of April 1, 2019	25
Complaints opened during period	55
Complaints closed during period	59
Complaints open as of September 30, 2019	21

* Adjusted from prior period.

Results of prosecutive actions

	EPA OIG only	Joint *	Total
Criminal indictments/informations/complaints **	2	0	2
Convictions	3	1	4
Civil judgments/settlements/filings	1	0	1
Criminal fines and recoveries	\$17,093	\$54,445	\$71,538
Civil recoveries	\$750,000	\$0	\$750,000
Prison time	0 months	24 months	24 months
Prison time suspended	100 months	0 months	100 months
Home detention	30 months	0 months	30 months
Probation	120 months	24 months	144 months
Community service	340 hours	0 hours	340 hours

* With one or more federal agencies.

** Sealed indictments are not included in this category.

Administrative actions

	EPA OIG only	Joint *	Total
Suspensions	2	8	10
Debarments	4	6	10
Other administrative actions	7	4	11
Total	13	18	31
Administrative recoveries	\$0	\$275,000	\$275,000
Cost savings	\$2,856	\$111,937	\$114,793

* With one or more federal agencies.

Summary of investigative reports issued and referrals for prosecution *

Number of Reports of Investigation issued **	7
Number of persons referred to U.S. Department of Justice for criminal prosecution	32
Number of persons referred to state and local authorities for criminal prosecution	2
Number of criminal indictments and informations resulting from any prior referrals to prosecutive authorities	2

* Investigative reports are comprised of final, interim and supplemental Reports of Investigation.

** Reports of Investigation issued may differ from the numbers reported in the Reports of Investigation section. In calculating the number of referrals, corporate entities were counted as “persons.”

Employee integrity cases*

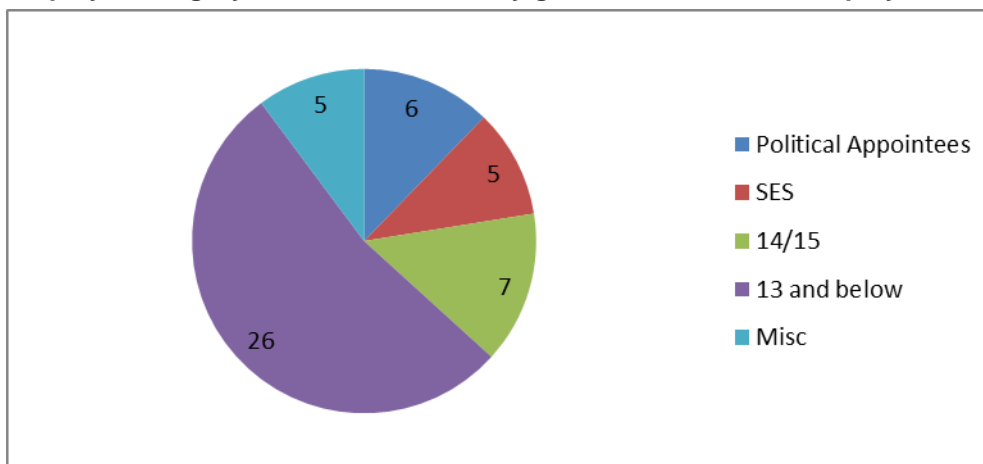
	Political appointees	SES	GS-14/15	GS-13 and below	Misc.	Total
Pending as of April 1, 2019	4	7	9	24	9	53
Opened*	2	2	3	10	0	17
Closed*	0	6	9	10	4	29
Pending September 30, 2019 **	6	5	7	26	5	49

* Employee integrity investigations involve allegations of criminal activity or serious misconduct by agency employees that could threaten the credibility of the agency, the validity of executive decisions, the security of personnel or business information entrusted to the agency, or financial loss to the agency (such as abuse of government bank cards or theft of agency funds). Allegations against former employees are included under “Misc.”

** Pending numbers as of September 30, 2019, may not add up due to investigative developments resulting in subjects being added or changed.

The chart below provides a breakdown by grade and number of employees who are the subject of employee integrity investigations.

Employee integrity cases: Breakdown by grade and number of employees



Appendices

Appendix 1—Reports Issued

Section 5(a)(6) of the Inspector General Act of 1978, as amended, requires a listing, subdivided according to subject matter, of each report issued by the OIG during the reporting period. For each report, where applicable, the Inspector General Act also requires a listing of the dollar value of questioned costs and the dollar value of recommendations that funds be put to better use.

Report no.	Report title	Date	Questioned costs			Potential monetary benefits
			Ineligible	Unsupported	Unreasonable	
FINANCIAL AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
19-F-0214	Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	6/27/19	\$0	\$0	\$0	\$0
19-F-0215	Fiscal Years 2017 and 2016 (Restated) Financial Statements for the Pesticide Registration Fund	6/27/19	0	0	0	0
SUBTOTAL = 2			\$0	\$0	\$0	\$0
PROJECTS NOT IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
19-N-0115	Management Alert: Certain Toxic Release Inventory Data Disclosed to the Public May Be Inaccurate	4/8/19	\$0	\$0	\$0	\$0
19-N-0154	EPA Region 5 Needs to Act on Transfer Request and Petition Regarding Ohio's Concentrated Animal Feeding Operation Permit Program	5/15/19	0	0	0	0
19-N-0156	Fiscal Year 2019 U.S. Chemical Safety and Hazard Investigation Board Management Challenges	5/20/19	0	0	0	0
19-N-0167	Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2018	6/4/19	0	0	0	0
19-N-0217	Certain Risk Communication Information for Community Not Up to Date for Amphenol/Franklin Power Products Site in Franklin, Indiana	6/27/19	0	0	0	0
19-N-0235	FY 2019 EPA Management Challenges	7/15/19				
SUBTOTAL = 6			\$0	\$0	\$0	\$0
PERFORMANCE AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
19-P-0123	Regional Research Programs Address Agency Needs but Could Benefit from Enhanced Project Tracking	4/18/19	\$0	\$0	\$0	\$0
19-P-0146	Corrective Actions and Additional Guidance Have Improved EPA's Fiscal Responsibility over Superfund Interagency Agreements	5/7/19	0	0	0	0
19-P-0147	CSB Still Needs to Improve Its "Incident Response" and "Identity and Access Management" Information Security Functions	5/9/19	0	0	0	0
19-P-0155	Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel	5/16/19	0	0	123,942	0
19-P-0157	EPA Overpaid Invoices Due to Insufficient Contract Management Controls	5/20/19	5,158	0	0	0
19-P-0158	Insufficient Practices for Managing Known Security Weaknesses and System Settings Weaken EPA's Ability to Combat Cyber Threats	5/21/19	0	0	0	0
19-P-0163	EPA Complied with Improper Payments Legislation but Stronger Internal Controls Are Needed	5/31/19	0	0	0	1,912,275
19-P-0168	EPA Demonstrates Effective Controls for Its On-Road Heavy-Duty Vehicle Compliance Program; Further Improvements Could Be Made	6/3/19	0	0	0	0
19-P-0195	Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRIA Systems Need Improvement	6/21/19	0	0	0	0
19-P-0198	EPA Needs to Improve Oversight of the Senior Environmental Employment Program	6/24/19	0	0	0	0

Report no.	Report title	Date	Questioned costs			Potential monetary benefits
			Ineligible	Unsupported	Unreasonable	
19-P-0201	EPA Complied with Applicable Laws and Rules for the July 2017 Superfund Task Force Report but Could Improve Transparency	6/24/19	0	0	0	0
19-P-0207	EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance	6/27/19	0	0	0	0
19-P-0236	EPA Region 6 Quickly Assessed Water Infrastructure after Hurricane Harvey but Can Improve Emergency Outreach to Disadvantaged Communities	7/16/19	0	0	0	0
19-P-0245	CSB Purchase Card Program at Low Risk for Unauthorized Purchases During Fiscal Year 2018	7/26/19	0	0	0	0
19-P-0251	More Effective EPA Oversight Is Needed for Particulate Matter Emissions Compliance Testing	7/30/19	0	0	0	0
19-P-0252	EPA's 2017 Glider Vehicle Testing Complied with Standard Practices	7/31/19	0	0	0	0
19-P-0267	EPA Exceeded the Deregulatory Goals of Executive Order 13771	8/9/19	0	0	0	0
19-P-0275	EPA Needs to Determine Strategies and Level of Support for Overseeing State Managed Pollinator Protection Plans	8/15/19	0	0	0	0
19-P-0277	EPA Office of Research and Development Needs to Address Barrier to Gathering External Customer Feedback	8/19/19	0	0	0	0
19-P-0278	EPA Oversight over Enterprise Customer Service Solution Needs Improvement	8/19/19	0	0	0	0
19-P-0279	EPA's Use of Administratively Determined Positions Is Consistent with Its Authority Under the Safe Drinking Water Act	8/21/19	0	0	0	0
19-P-0283	Follow-Up Audit: EPA Took Steps to Improve Records Management	8/27/19	0	0	0	0
19-P-0302	EPA Not Effectively Implementing the Lead-Based Paint Renovation, Repair and Painting Rule	9/9/19	0	0	0	0
19-P-0307	Risk Assessment Determines that Travel Card Program Merits an Audit Next Year Because Internal Controls Not Adequate	9/19/19	0	0	0	0
19-P-0318	EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health	9/25/19	0	0	0	0
SUBTOTAL = 25			\$5,158	\$0	\$123,942	\$1,912,275
TOTAL REPORTS ISSUED = 33			\$5,158	\$0	\$123,942	\$1,912,275

Appendix 2—Reports Issued Without Management Decisions

For Reporting Period Ended September 30, 2019

Section 5(a)(10)(B) of the Inspector General Act of 1978, as amended, requires a summary of each audit, inspection and evaluation report issued during the reporting period for which no establishment comment was returned within 60 days of providing the report to the establishment. The literal language of Section 5(a)(10)(B) requests the OIG to track reports issued prior to commencement of the reporting period. However, given that this provision was intended to codify the February 27, 2015, semiannual requests from Senators Grassley and Johnson, the OIG interprets this provision to apply to reports within the semiannual period. There were no reports for which we did not receive a response within 60 days during the semiannual period.

Section 5(a)(10)(A) of the Inspector General Act of 1978, as amended, requires a summary of each audit, inspection and evaluation report issued before the commencement of the reporting period for which no management decision had been made by the end of the reporting period, an explanation of the reasons such management decision had not been made, and a statement concerning the desired timetable for achieving a management decision on each such report. Office of Management and Budget Circular A-50 requires resolution within 6 months of a final report being issued. In this section, we report on audits and evaluations with no management decision or resolution within 6 months of final report issuance. In the summaries below, we provide the resolution status of management decisions not made as of September 30, 2019, which the OIG desires to resolve as soon as possible.

Office of the Administrator

Report No. [17-P-0378](#), *Management Alert: EPA Should Promptly Reassess Community Risk Screening Tool*, September 7, 2017

Summary: Our review substantiated some hotline allegations about the Community-Focused Risk Screening Tool, known as C-FERST. We found that the EPA's Office of Research and Development took 8 years to develop a tool that is different from its intended purpose, requires effective training to use, overlaps with other EPA tools, and has not been widely used in the approximately 9 months after it was publicly released. Without metrics to measure performance, it is unclear whether C-FERST is being used for its intended purpose or meets user needs. Further, having multiple agency mapping tools that perform similar functions can confuse potential users. On October 11, 2018, the Office of Research and Development advised the OIG that, based on an internal review of C-FERST, future development and use of C-FERST was ended, and unique aspects of C-FERST were incorporated into other EPA tools. One recommendation—for the Deputy Administrator to examine all EPA web-based screening and mapping tools to ensure the need for each tool and to avoid potential overlap, duplication and waste—remains unresolved.

Resolution Status: The agency and the OIG continue to have discussions regarding the unresolved recommendation.

Office of the Chief Financial Officer; Office of Enforcement and Compliance Assurance

Report No. [18-P-0239](#), *EPA Asserts Statutory Law Enforcement Authority to Protect Its Administrator but Lacks Procedures to Assess Threats and Identify the Proper Level of Protection*, September 4, 2018

Summary: This report made recommendations to two offices that remain unresolved:

- **Office of the Chief Financial Officer.** We notified the agency of an internal control weakness that resulted in an authorized payment for pay above the annual pay limit for an agent. We issued four recommendations to improve internal controls, determine whether similar overpayments have been made, and recover any overpayments. The Office of the Chief Financial Officer submitted corrective actions; however, we found some actions to be incomplete. Two of these recommendations therefore remain unresolved.

Resolution Status: The agency provided a response on October 4, 2019, which the OIG is reviewing.

- **Office of Enforcement and Compliance Assurance.** We found that the Protective Service Detail for the EPA Administrator had no approved standard operating procedures to address the level of protection required for the Administrator or how those services were to be provided. As a result, the detail incurred over \$3.5 million in costs from February 1, 2017, through December 31, 2017, for Administrator Scott Pruitt—an increase of over 110 percent compared to the prior period's costs of \$1.6 million for the previous

Administrator—without documented justification. We also found that agents worked overtime without proper justification, resulting in improper payments. We recommended that the EPA implement new policies, procedures and/or guidance for Protective Service Detail operations and agents; regularly complete a threat analysis to identify the proper protection required for the Administrator; and identify and report any improper payments to the Office of the Chief Financial Officer. Of the seven recommendations issued, five remain unresolved.

Resolution Status: The agency provided a response on August 29, 2019, which is currently under review.

Region 8—Regional Administrator

Report No. [2007-4-00078](#), *Cheyenne River Sioux Tribe Outlays Reported Under Five EPA Assistance Agreements, September 24, 2007*

Summary: The tribe did not comply with the financial and program management standards under the Code of Federal Regulations and Office of Management and Budget Circular A-87. We questioned \$3,101,827 of the \$3,736,560 in outlays reported. The tribe's internal controls were not sufficient to ensure that outlays reported complied with federal cost principles, regulations and grant conditions. In some instances, the tribe also was not able to demonstrate that it had completed all work under the agreements and had achieved the intended results.

Resolution Status: The OIG has not received a response from the EPA.

**Total reports issued before reporting period for which
no management decision had been made as of September 30, 2019 = 3**

Appendix 3—Reports with Corrective Action Not Completed

In compliance with reporting requirements of Sections 5(a)(3) and 5(a)(10)(C) of the Inspector General Act of 1978, as amended, we are to identify each significant recommendation described in previous semiannual reports on which corrective action has not been completed, and a summary of each audit, inspection and evaluation report for which there are any outstanding unimplemented recommendations. We are also to identify the aggregate potential monetary benefits of the unimplemented recommendations.

This appendix contains separate tables of unimplemented recommendations for the EPA and CSB from 2008 to September 30, 2018, in 52 OIG audit reports.

There are a total of 77 current and unimplemented recommendations for the EPA with total potential monetary benefits of approximately \$68 million, none of which was sustained by the agency. Sustained cost is the dollar value of questioned costs or monetary benefits identified by the OIG during an audit/evaluation and agreed to in whole or in part by the agency. There was one CSB recommendation with \$0.349 million of sustained monetary benefits.

Below is a listing of the responsible EPA offices to which recommendations included in the following tables are directed. While a recommendation may be listed as unimplemented, the agency may be on track to complete agreed-upon corrective actions by the planned due date.

Responsible EPA Offices:

DA	Deputy Administrator (within the Office of the Administrator)
OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCSPP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Enforcement and Compliance Assurance
OLEM	Office of Land and Emergency Management
OMS ¹	Office of Mission Support
OP	Office of Policy (within the Office of the Administrator)
ORD	Office of Research and Development
OW	Office of Water
Region 6	
Region 9	

¹ Effective November 26, 2018, the former Office of Environmental Information and Office of Administration and Resources Management were merged into the new Office of Mission Support. In this appendix, any recommendations originally issued to the former offices will be listed as under the purview of the new office.

EPA Reports with Unimplemented Recommendations

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	EPA's Water Infrastructure Finance and Innovation Act Program Needs Additional Internal Controls 19-P-0045 12/14/18	OMS	4. Test and assess the implemented Water Infrastructure Finance and Innovation Act SharePoint system access controls to determine whether the controls are functioning as intended and comply with federal requirements and the EPA's information technology security program.	3/30/19		
Management and Operations	EPA's Fiscal Years 2018 and 2017 Consolidated Financial Statements 19-F-0003 11/14/18	OMS	14. Implement controls to enforce the required verification of individuals' identity every time individuals enter the computer rooms. 15. Perform a review of system requirements and evaluate the suitability of existing technology to replace or implement updates to the computer room's surveillance system and generators. Update or replace, if warranted, the equipment based	3/31/20 1/15/22		
Environmental Contamination and Cleanup	EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and the Environment 19-P-0002 11/15/18	OW	3. Complete development of the probabilistic risk assessment tool and screening tool for biosolids land application scenarios.	3/31/19		
		OW	4. Develop and implement a plan to obtain the additional data needed to complete risk assessments and finalize safety determinations on the 352 identified pollutants in biosolids and promulgate regulations as needed.	12/31/22		
		OW	6. Publish guidance on the methods for the biosolids pathogen alternatives 3 and 4.	12/31/20		
		OW	8. Issue updated and consistent guidance on biosolids fecal coliform sampling practices.	12/31/20		
		OW	12. Conduct regular biosolids training and conference calls or meetings for regional and state staff and wastewater treatment operators to improve consistency in rule interpretation and aid in knowledge transfer.	12/31/19		
Management and Operations	EPA Law Enforcement Availability Pay Properly Certified but Controls over Process Could Be Improved 19-P-0001 11/6/18	OECA	1. Enforce compliance by the investigators to submit, and the supervisors to approve, the monthly activity reports supporting Law Enforcement Availability Pay within the required timeframes in the Monthly Activity Reporting System Purpose, Requirements and Procedures Manual.	10/1/19	4/1/20	
			2. Implement controls to improve timeliness of the annual certification process for Law Enforcement Availability Pay.	10/1/19	4/1/20	

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	Management Alert - EPA's Incident Tracking System Lacks Required Controls to Protect Personal Information 18-P-0298 9/28/18	OMS	1. Develop and implement a strategy that protects the confidentiality of personally identifiable information and sensitive personally identifiable information, as required by federal and EPA privacy and password guidance, for incident tickets in the current incident tracking system.	9/30/18	12/31/19	
Air Quality	Collecting Additional Performance Data from States Would Help EPA Better Assess the Effectiveness of Vehicle Inspection and Maintenance Programs 18-P-0283 9/25/18	OAR	3. Revise the vehicle inspection and maintenance rule to remove the cross reference to Title 40 § 51.353(b)(1) of the Code of Federal Regulations and provide defined evaluation methodology guidance to enable states to quantify emission reductions. 5. Develop and implement guidance on the calculation of individual test statistics in state reports to provide consistency in state reports across regions. 7. Issue guidance to address any trends or common problems identified by the outreach conducted to states with deficiencies in program implementation.	6/30/19 6/30/19 3/31/20	12/31/19 12/31/19	
Toxics, Chemical Safety and Pesticides	Measures and Management Controls Needed to Improve EPA's Pesticide Emergency Exemption Process 18-P-0281 9/25/18	OCSPP	1. Develop and implement applicable outcome-based performance measures to demonstrate the human health and environmental effects of the EPA's emergency exemption decisions. 5. Develop concise emergency exemption application guidance that specifies the minimum requirements of an application submission and is available on the Office of Pesticide Programs Section 18 website. 6. Provide clear guidance to state lead agencies on how and when they can use efficacy data from other state lead agencies to satisfy the emergency exemption application criteria. 7. Expand the data presented in the Office of Pesticide Programs Section 18 database by considering additional data points, such as application acreage requested, actual acreage applied and registration status of each exempted pesticide.	6/30/20 9/30/20 9/30/20 6/30/20		

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Air Quality	EPA Can Strengthen Its Process for Revising Air Quality Dispersion Models that Predict Impact of Pollutant Emissions 18-P-0241 9/5/18	OAR	<p>2. Develop a quality assurance project plan or equivalent documents describing the results of systematic planning before developing a new air quality dispersion model or undertaking any significant revisions in the future to existing preferred air quality dispersion models, which are codified in Appendix A to Appendix W of 40 CFR Part 51.</p> <p>3. Revise the Office of Air Quality Planning and Standards' Quality Management Plan to state whether the agency is developing quality assurance project plans or equivalent documents to meet EPA Quality System requirements for developing or revising preferred air quality dispersion models.</p>	3/31/20 3/31/20		
Research and Laboratories	EPA Needs a Comprehensive Vision and Strategy for Citizen Science that Aligns with Its Strategic Objectives on Public Participation 18-P-0240 9/5/18	DA ORD	<p>1. Establish a strategic vision and objectives for managing the use of citizen science that identifies:</p> <ol style="list-style-type: none"> Linkage to the agency's strategic goals, Roles and responsibilities for implementation, and Resources to maintain and build upon existing agency expertise. <p>2. Through appropriate EPA offices, direct completion of an assessment to identify the data management requirements for using citizen science data and an action plan for addressing those requirements, including those on sharing and using data, data format/standards, and data testing/validation.</p> <p>3. Finalize, in coordination with the Office of Environmental Information and Region 1, the <i>Draft Quality Assurance Handbook for Citizen Science</i>, and communicate to agency staff and citizen science groups the availability and content of this handbook.</p> <p>4. Build capacity for managing the use of citizen science, and expand awareness of citizen science resources, by:</p> <ol style="list-style-type: none"> Finalizing the checklist on administrative and legal factors for agency staff to consider when developing citizen science projects, as well as identifying and developing any procedures needed to ensure compliance with steps in the checklist; Conducting training and/or marketing on the EPA's citizen science intranet site for program and regional staff in developing projects; and Finalizing and distributing materials highlighting project successes and how the EPA has used results of its investment in citizen science 	12/31/20 12/31/20 12/31/20		

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	EPA Asserts Statutory Law Enforcement Authority to Protect Its Administrator but Lacks Procedures to Assess Threats and Identify the Proper Level of Protection 18-P-0239 9/4/2018	OECA	2. Implement the Office of General Counsel opinion through new policies, procedures and/or guidance that defines the amount of time agents must spend on investigating environmental crimes and how the time will be monitored and documented by supervisors.	9/30/18		
Environmental Contamination and Cleanup	EPA Needs to Finish Prioritization and Resource Allocation Methodologies for Abandoned Uranium Mine Sites on or Near Navajo Lands 18-P-0233 8/22/2018	Regions 6 and 9	1. Complete the necessary removal site evaluations and engineering evaluations/cost analyses. 2. Fully develop and implement prioritization and resource allocation methodologies for the Tronox abandoned uranium mine sites on or near Navajo Nation lands.	12/31/20 12/31/21		
Management and Operations	EPA's Purchase Card and Convenience Check Program Controls Are Not Effective for Preventing Improper Purchases 18-P-0232 8/20/2018	DA	11. Issue an agencywide memorandum to emphasize compliance with federal and EPA requirements for purchase card and convenience check transactions.	9/30/18	10/31/19	\$152
Toxics, Chemical Safety and Pesticides	EPA Completed OIG Recommendations for the Presidential Green Chemistry Challenge Awards Program but Lacks Controls over Use of Unverified Results 18-P-0222 7/20/2018	OCSPP	1. Establish and document internal controls to prevent the use of Presidential Green Chemistry Challenge Awards results in Pollution Prevention Program performance metrics.	12/31/18	4/15/19	
Water Issues	Management Weaknesses Delayed Response to Flint Water Crisis 18-P-0221 7/21/2018	OECA and OW	1. Establish controls to annually verify that states are monitoring compliance with all Lead and Copper Rule requirements, including accurately identifying tier 1 sampling sites and maintaining continuous corrosion control treatment.	9/30/19	1/31/20	
		OW	2. Revise the Lead and Copper Rule to improve the effectiveness of monitoring and corrosion control treatment protocols.	2/28/19	1/31/20	

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	Operational Efficiencies of EPA's Human Resources Shared Service Centers Not Measured 18-P-0207 5/31/18	OMS	<p>1. Develop a plan that establishes a baseline to measure the future program operational efficiency of human resources operations.</p> <p>2. Establish a workgroup comprising regional and program representatives to develop a baseline level of human resources support necessary for each program and regional office.</p> <p>3. Review human resources policies, prioritize the policies requiring updates, and update the policies with stakeholder input.</p>	2/28/19 6/30/19 12/31/19	7/31//19 8/30/19	
Air Quality	EPA Did Not Identify Volkswagen Emissions Cheating; Enhanced Controls Now Provide Reasonable Assurance of Fraud Detection 18-P-0181 5/29/18	OAR	<p>1. Define performance measures to assess the performance of the EPA's light-duty vehicle compliance program.</p> <p>2. Conduct and document a formal risk assessment for the EPA's light-duty vehicle compliance program that prioritizes risks and links specific control activities to specific risks. Update the risk assessment on a scheduled and periodic basis.</p>	3/31/21 12/31/19		
Toxics, Chemical Safety and Pesticides	EPA Can Better Manage State Pesticide Cooperative Agreements to More Effectively Use Funds and Reduce Risk of Pesticide Misuse 18-P-0079 2/13/18	OECA	1. Develop and implement additional Federal Insecticide, Fungicide, and Rodenticide Act guidance to assist Project Officers in evaluating whether funding is reasonable given projected work plan tasks.	11/30/19		
Management and Operations	Self-Insurance for Companies with Multiple Cleanup Liabilities Presents Financial and Environmental Risks for EPA and the Public 18-P-0059 12/22/17	OLEM	2. Once the study in Recommendation 1 is complete, use the information to develop appropriate risk management actions to mitigate any identified problems in line with Agency practices for enterprise risk management under Office of Management and Budget Circular A-123, and determine whether additional controls, such as the requirement for full disclosure of all self-insured environmental liabilities over corporate self-insurance, should be implemented and if corporate self-insurance should continue as an option.	9/30/20		
			3. Update standard operating procedures and data systems to accommodate the implemented risk management actions.	9/30/21		
		OLEM & OECA	4. Train staff on the implemented risk management actions.	12/31/22	12/31/21	

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
		OLEM	5. Develop or update existing standard operating procedures to outline the Office of Land and Emergency Management and Office of Enforcement and Compliance Assurance roles and responsibilities for overseeing the validity of Resource Conservation and Recovery Act and Superfund financial assurance instruments, where needed.	6/30/20		
		OLEM	6. Develop and include procedures for checking with other regions for facilities/sites with multiple self-insured liabilities in the standard operating procedures created for Recommendation 5.	6/30/20		
		OLEM	7. Develop and include instructions on the steps to take when an invalid financial assurance instrument (expired, insufficient in dollar amount, or not provided) is identified in the standard operating procedures created for Recommendation 5 collect information on the causes of invalid financial assurance.	6/30/20		
			8. Train staff on the procedures and instructions developed for Recommendations 5 through 7.	9/30/20		
		OECA	9b. Work with EPA regions and states to identify and implement appropriate metrics, including metrics to help identify, track, and correct, on a facility level, where there are monetary gaps in the amount of Resource Conservation and Recovery Act financial assurance required and provided. Develop and distribute to EPA regions and states annual reports on these metrics.	12/31/20	12/31/19	
		OECA	10. Develop and distribute to EPA regions and states annual reports that include progress on the reduction of financial assurance that is expired, insufficient and/or not provided.	9/30/19	12/31/19	
Toxics, Chemical Safety and Pesticides	EPA Can Better Reduce Risks From Illegal Pesticides by Effectively Identifying Imports for Inspection and Sampling 17-P-0412 9/28/17	OECA	1. Establish national compliance monitoring goals based on assessment and consideration of available regional resources.	9/30/19	3/27/20	
			2. Implement internal controls to monitor and communicate progress on regional goals.	9/30/19	3/27/20	
Toxics, Chemical Safety and Pesticides	EPA Needs to Manage Pesticide Funds More Efficiently 17-P-0395 9/18/17	OCSPP	2. Develop and implement a plan to reduce excess Pesticides Reregistration and Expedited Processing Fund and Pesticide Registration Fund balances within the established target range.	12/31/21		

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Research and Laboratories	Management Alert: EPA Should Promptly Reassess Community Risk Screening Tool 17-P-0378 9/7/17	ORD	4. Work with agency offices responsible for other geospatial mapping tools to develop a decision support matrix for when to use certain tools and for what purposes.	9/30/19		
Management and Operations	EPA Needs to Institutionalize Its "Lean" Program to Reap Cost and Time Benefits 17-P-0346 7/31/17	OP	1. Implement a strategy for institutionalizing the Lean Government Initiative within the agency by integrating the application of Lean practices and business process improvement approaches.	6/30/18		
			2. Develop policies that specify how to plan, design, oversee and implement Lean practices within the agency.	6/30/18		
			3. Develop a process for monitoring, tracking and measuring quantifiable results, including cost savings, for Lean projects.	1/31/18		
			4. Develop a process for a) vetting projects that have the potential for standardized implementation across the agency and b) collaborating on projects to maximize the application of Lean, as well as sharing experiences and lessons learned agencywide.	6/30/18		
			5. Develop and implement a consistent and standardized Lean training effort for the EPA's staff.	6/30/18		
Air Quality	24. Improved Data and EPA Oversight Are Needed to Assure Compliance With the Standards for Benzene Content in Gasoline 17-P-0249 6/8/17	OAR	1. Improve controls over the reporting system to assure facility-submitted data are of the quality needed to assess compliance with the regulations. These controls should provide reasonable assurance that the following occurs: a. Volumes and average benzene concentrations in facilities annual benzene reports match those calculated based on their batch reports. b. Benzene concentrations in facility batch reports and annual benzene reports contain two decimal places. c. Production dates match the compliance year in facility reports. d. Facilities use only valid product codes in their reports. e. Only valid company and facility identification numbers are used. f. Maximum average benzene concentrations for the second compliance period and beyond match the corresponding annual average benzene concentrations. g. Import companies aggregate their facilities and submit just one annual benzene report. h. All required reports are submitted.	U	6/30/20	

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
			3. Revise the benzene regulations to require that attest engagements verify annual average benzene concentrations and volumes with batch reports, to ensure that credits needed or generated are correct.	U	6/30/20	
			6. Ensure the integrity of benzene credit trading by developing and implementing a process to verify that annual average benzene concentration and total volume values that facilities input into the trading database are supported by batch reports.	6/30/20		
			9. Revise the annual benzene report so that facilities must report the number of benzene deficits or credits at the end of the current reporting year.	9/30/20		
Water Issues	EPA Needs to Provide Leadership and Better Guidance to Improve Fish Advisory Risk Communications 17-P-0174 4/12/17	OW	1. Provide updated guidance to states and tribes on clear and effective risk communication methods for fish advisories, especially for high-risk groups. This guidance could recommend posting fish advisory information at locations where fish are caught and using up-to-date communication methods that include social media, webinars, emails, newsletters, etc.	3/31/20		
			2. Working with states and tribes, develop and disseminate best practices they can use to evaluate the effectiveness of fish advisories in providing risk information to subpopulations, such as subsistence fishers, tribes and other high fish-consuming groups.	3/30/20		
Management and Operations	EPA's Fiscal Years 2016 and 2015 Consolidated Financial Statements 17-F-0046 11/15/16	OCFO	9. Work with the Compass Financials service provider to establish controls for creating and locking administrative accounts. 10. Work with the Compass Financials service provider to develop and implement a methodology to monitor accounts with administrative capabilities.	9/30/21 9/30/21		
Air Quality	EPA Has Not Met Certain Statutory Requirements to Identify Environmental Impacts of Renewable Fuel Standard 16-P-0275 8/18/16	OAR	2. Complete the anti-backsliding study on the air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act. 3. Determine whether additional action is needed to mitigate any adverse air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act.	9/30/24 9/30/24		

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	Audit of EPA's Fiscal Years 2015 and 2014 Consolidated Financial Statements 16-F-0040 11/16/15	OCFO	26. Implement an internal control process for transferring the management of an applications user access to the Application Management Staff. 27. Conduct an inventory of Office of the Chief Financial Officer systems managed by the Application Management Staff and create or update supporting access management documentation for each application. 36. Complete the corrective actions previously identified in Table 4. 38. Follow the terms in the legal source documents when recording interest by ensuring interest is recorded in the system when a receivable becomes past due, either through Compass automatic calculations or manual interest calculations prepared by the Cincinnati Finance Center.	12/31/17 12/31/17 9/30/16 9/30/16	12/31/18 12/31/18 5/31/18 5/31/18	
Management and Operations	Conditions in the U.S. Virgin Islands Warrant EPA Withdrawing Approval and Taking Over Management of Some Environmental Programs and Improving Oversight of Others 15-P-0137 4/17/15	Region 2	18. Develop a plan to address currently uncompleted tasks and activities and develop a schedule for reprogramming grant funds to accomplish these tasks if the U.S. Virgin Islands does not or cannot complete them. Upon completion of the financial management corrective actions, follow the Office of the Chief Financial Officer's Resource Management Directive System 2520-03 to determine whether any of the current unspent funds of approximately \$37 million under the U.S. Virgin Islands' assistance agreements could be put to better use.	9/30/18	9/30/19 3/31/20	\$37,000
Management and Operations	Internal Controls Needed to Control Costs of Emergency and Rapid Response Services Contracts, as Exemplified in Region 6 14-P-0109 2/4/14	Region 6	3. Direct Contracting Officers to require that the contractor adjust all its billings to reflect the application of the correct rate to team subcontract Other Direct Costs.	9/30/24		
Air Quality	Air Quality Objectives for the Baton Rouge Ozone Nonattainment Area Not Met Under EPA Agreement 2A-96694301 Awarded to the Railroad Research Foundation 13-R-0297 6/20/13	Region 6	1. Recover federal funds of \$2,904,578 unless the foundation provides a verifiable and enforceable remedy to reduce diesel emissions in the Baton Rouge ozone nonattainment area, as required by the cooperative agreement.	9/30/20		\$2,905

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Environmental Contamination and Cleanup	Improvements Needed in EPA Training and Oversight for Risk Management Program Inspections 13-P-0178 3/21/13	OLEM	7. Coordinate with the Assistant Administrator for Enforcement and Compliance Assurance to revise inspection guidance to recommend minimum inspection scope for the various types of facilities covered under the program and provide detailed examples of minimum reporting.	7/31/14 2/28/19	6/30/22	
			8. Coordinate with the Assistant Administrator for Enforcement and Compliance Assurance to develop and implement an inspection monitoring and oversight program to better manage and assess the quality of program inspections, reports, supervisory oversight and compliance with inspection guidance.	9/30/14 2/28/20	2/30/23	
Environmental Contamination and Cleanup	EPA Needs to Further Improve How It Manages Its Oil Pollution Prevention Program 12-P-0253 2/6/12	OLEM	1. Improve oversight of facilities regulated by the EPA's oil pollution prevention program by: d. Producing a biennial public assessment of the quality and consistency of Spill Prevention, Control, Countermeasure Plans and Facility Response Plans based on inspected facilities.		6/30/20	
Water Issues	EPA Should Revise Outdated or Inconsistent EPA-State Clean Water Memoranda of Agreement 10-P-0224 9/14/10	OW	2-2. Develop a systematic approach to identify which states have outdated or inconsistent Memorandums of Agreements; renegotiate and update those Memorandums of Agreements using the Memorandum of Agreements template; and secure the active involvement and final, documented concurrence of headquarters to ensure national consistency.	9/28/18	9/30/20	
Environmental Contamination and Cleanup	Making Better Use of Stringfellow Superfund Special Accounts 08-P-0196 7/9/08	Region 9	2. Reclassify or transfer to the Trust Fund, as appropriate, \$27.8 million (plus any earned interest less oversight costs) of the Stringfellow special accounts in annual reviews, and at other milestones including the end of Fiscal Year 2010, when the record of decision is signed and the final settlement is achieved.	12/31/12	9/21/23	\$27,800
Total						\$ 67,857

CSB Reports with Unimplemented Recommendations

Category	Report title, number and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits recommended (in \$000s)
Management and Operations	CSB Needs to Continue to Improve Agency Governance and Operations 16-P-0179 5/23/16	CSB	6. Include the General Services Administration in any future office leasing plans and revisit office needs for a potential adjustment or supplement to the Washington, D.C., and Denver office leases to reduce space within the General Services Administration benchmarks.	10/20/22		\$349
Total						\$349

Appendix 4—Closed Investigations Not Previously Publicly Disclosed

For Reporting Period Ended September 30, 2019

Details on each investigation conducted by the OIG involving both senior and non-senior employees closed during the semiannual reporting period ending September 30, 2019, are provided below. We also include a separate listing of investigations conducted by the OIG and closed during the semiannual reporting period involving non-employees such as grant recipients, contractors and former EPA employees.

Investigations Involving Presidential Appointees Not Previously Publicly Disclosed

None.

Investigations Involving Senior Employees Not Previously Publicly Disclosed

CASE NUMBER: OI-HQ-2017-CAC-0120

An EPA SES-level employee allegedly provided false information on the Standard Form 86, *Questionnaire for National Security Positions*. The investigation found the employee did not include previous employment-related discipline on the form. The employee resigned after receiving a notice of proposed removal. The case was referred to and declined for prosecution by the U.S. Department of Justice on September 8, 2017.

CASE NUMBER: OI-HQ-2017-CFR-0085

An EPA GS-15 employee allegedly violated bribery and conflict of interest criminal statutes and EPA scientific integrity policy regarding an agency classification decision. During the investigation, the OIG received additional information that other high-level EPA employees may have benefited financially as a result of the decision. The allegations were not supported.

CASE NUMBER: OI-HQ-2017-CFR-0088

An EPA GS-15 employee and an EPA GS-14 employee were alleged to have made unauthorized and inaccurate changes to data in a contractor database on an information technology contract that they oversaw. The allegations of misconduct were not supported.

CASE NUMBER: OI-HQ-2018-CFD-0064

An EPA GS-15 Special Agent supervisor allegedly steered a contract to a partner in an outside business. The Federal Bureau of Investigation led a joint investigative effort into the potential criminal allegations, with the OIG investigating any potential employee policy violations. On June 19, 2019, the OIG was notified by the Federal Bureau of Investigation that the case was declined by the U.S. Department of Justice for prosecution. During the course of the investigation the EPA employee retired; as a result, the administrative portion of the investigation was closed.

CASE NUMBER: OI-AT-2018-ADM-0122

An EPA GS-15 employee allegedly attended personal appointments and events during work hours without using annual or sick leave. It was further alleged that the employee used his/her EPA title to solicit funds for scholarships and had inappropriately received a reasonable accommodation to fly first-class for official business. The allegations were not supported.

CASE NUMBER: OI-HQ-2018-ADM-0126

An EPA GS-15 employee allegedly sexually assaulted another employee while at work, just prior to retiring. It was also alleged that after the assault was reported, the resulting inquiry was not handled by management and human resources officials in accordance with the EPA's workplace harassment order. Both allegations were supported. The victim did not press assault charges, the subject retired, and management and human resource officials underwent additional anti-harassment training. Because this was an administrative case, as the victim did not press charges, the case was not referred to the U.S. Department of Justice.

CASE NUMBER: OI-CH-2018-ADM-0132

An EPA GS-15 employee allegedly took part in an “off-the-books” timekeeping scheme for 6 years where the employee would keep track through email of the number of hours worked in excess of the standard 8-hour day and then would take time off based on these extra hours. The employee did not record this time off in the employee’s timecards. The employee admitted to the scheme; however, the statute of limitations for the potential criminal violations had expired and the case therefore was not referred to the U.S. Department of Justice. The employee retired from federal service during the investigation.

Investigations Involving Non-Senior Employees Not Previously Publicly Disclosed**CASE NUMBER: OI-CH-2019-ADM-0108**

An EPA GS-14 allegedly committed fraud by editing an official EPA document containing a manager’s signature. The investigation found that the document in question had not been officially signed by all parties, thus was still in draft form when the edits were made. It was found that the complainant misunderstood the process of how this type of document is handled. The allegation was not supported.

CASE NUMBER: OI-CI-2015-CFR-0055

An EPA GS-13 employee allegedly used his/her official position to receive gifts, meals and personal favors from, as well as socialize with, EPA contractors. The allegations were supported. The employee was suspended without pay for 30 days.

CASE NUMBER: OI-AR-2017-CAC-0006

An EPA GS-13 employee allegedly falsified information on an Electronic Questionnaires for Investigations Processing application. During the investigation the employee was transferred to a position that does not require a security clearance. The investigation was inconclusive.

CASE NUMBER: OI-CH-2017-ADM-0068

An EPA GS-13 employee allegedly engaged in time-and-attendance fraud by teleworking full-time from a residence outside the employee’s official duty station and thus was receiving a higher locality pay than what the employee was entitled. The allegation was not supported.

CASE NUMBER: OI-DA-2018-ADM-0006

An EPA GS-13 employee was arrested while off-duty for possession of a controlled substance and unlawfully carrying a weapon. The employee admitted to the arrest and possession of these items and, upon returning to work, was ordered to participate in counseling through the Employee Assistance Program and was subject to unannounced drug testing. The employee failed an unannounced drug test and was subsequently terminated.

CASE NUMBER: OI-HQ-2018-ADM-0100

An EPA GS-13 employee was arrested during non-duty hours for allegedly possessing synthetic marijuana. An investigation to determine if the employee had been involved in the manufacture of synthetic marijuana and if the employee had made a false statement on the Standard Form 85P, *Questionnaire for Public Trust Positions*, regarding the arrest did not reveal that the employee was involved in the manufacture of synthetic marijuana or made false statements on the form.

CASE NUMBER: OI-NE-2019-ADM-0001

An EPA OIG GS-13 Special Agent allegedly was charging hours in the office’s project management reporting system that were not supported by documented work. The allegation was supported. The employee was suspended for 5 days.

CASE NUMBER: OI-HQ-2017-ADM-0146

An EPA GS-11 employee allegedly regularly failed to report for duty as scheduled, and did not contact a supervisor to request leave. The agency determined that the employee was absent without leave. The employee was removed from federal service.

CASE NUMBER: OI-DA-2017-ADM-0041

An EPA GS-7 employee allegedly provided false information on application materials for federal employment, specifically his/her employment history on a resume and criminal history on the Standard Form 85P, *Questionnaire for Public Trust Positions*. The investigation revealed that the employee did not provide false information on a resume and previously had disclosed information to the EPA about the criminal history. The allegations were not supported.

CASE NUMBER: OI-PH-2019-ADM-0008

An office within the EPA allegedly provided false information on financial statements. Interviews and reviews of EPA documents were conducted. The allegations were not supported.

Investigations Involving Non-Employees Not Previously Publicly Disclosed**CASE NUMBER: OI-AR-2013-CAC-0072**

An EPA server was allegedly compromised. A review of the computer system logs determined a file had been uploaded into the root website directory within the server, causing the server to be compromised. The allegation was supported. The investigation also determined that a foreign actor caused the compromise. The subject was indicted on conspiracy to defraud the United States and fraud charges. The subject was arrested and charged in the subject's home country. The subject will not face extradition to the United States.

CASE NUMBER: OI-RTP-2017-CAC-0047

An EPA contractor allegedly installed a keylogger device on an EPA employee's keyboard, enabling the contractor to log the EPA employee's key strokes. The allegation was supported. The former contractor pleaded guilty to unlawfully accessing a computer and was sentenced to 2 years of probation and fined \$5,000. The former contractor was debarred from participation in federal procurement and non-procurement programs for 3 years.

CASE NUMBER: OI-HQ-2018-CCR-0090

There was an alleged phishing attack against the EPA network. An email was sent to multiple EPA network users from what appeared to be a legitimate business source. However, the organization from which the email appeared to originate had been compromised and it sent infected emails to legitimate users from its database. The EPA network was not an entry point and a vulnerability was identified in Microsoft's Office 365 Suite. Investigators received updates from Microsoft that explained the vulnerability and remediation instructions for the problem.

CASE NUMBER: OI-HQ-2019-CCR-0014

An EPA contractor allegedly gained unauthorized access to confidential business information stored on an EPA employee's laptop. The investigation revealed that the contractor was properly given authorization to access the confidential business information. The allegation was not supported.

CASE NUMBER: OI-AR-2013-CAC-0120

A construction company allegedly falsified documents in order to be awarded a contract involving EPA Drinking Water State Revolving Funds. The company provided the name of a certified disadvantaged business enterprise in its bid documents without the disadvantaged business enterprise's knowledge or consent. The allegation was supported; however, the U.S. Attorney's office declined the case for prosecution and the matter was declined for administrative remedies.

CASE NUMBER: OI-DA-2017-CFR-0121

An EPA Drinking Water State Revolving Fund recipient alleged that a contractor provided an inferior above-ground water storage tank. Interviews and review of the contract documents disclosed no federal violations. The allegation was not supported.

CASE NUMBER: OI-CH-2018-CFD-0113

An EPA contractor self-reported to the EPA that it had received an overpayment of \$64,133 under a contract it was previously awarded. The OIG worked with the EPA and the contractor to facilitate the recovery of the overpayment. The EPA funds were recovered in full.

CASE NUMBER: OI-CH-2018-AFD-0115

It was alleged that a city municipality was erroneously foreclosing on homes to allow a nonprofit housing corporation to purchase the homes using grant funds from the EPA Brownfields Program. Investigators determined that all interviewees admitted to being delinquent for several years on state taxes, which then allowed the city to legally foreclose on the properties. The Brownfields funds were then used by the grantee to clean up the area. The allegations were not supported.

CASE NUMBER: OI-DA-2018-LFD-0131

It was alleged that a state department of health agency mishandled the lab analysis of drinking water samples. The investigation revealed several quality control and documentation issues in the agency's processing of samples. The allegations were supported. As a result of the investigation, lab officials changed standard operating procedures and generated corrective action reports.

CASE NUMBER: OI-AT-2019-AFD-0060

An employee for a state Department for Environmental Protection (an EPA grant recipient) allegedly received a bribe in return for not performing inspection duties at an agricultural facility. Multiple interviews and record reviews were conducted. The allegations were not supported.

CASE NUMBER: OI-AR-2015-CFR-0007

Potential fraud-related issues were identified at a nonprofit organization receiving EPA grant funds during an audit performed by another federal agency. The investigation determined that no EPA funds were misused.

CASE NUMBER: OI-SA-2015-CFR-0123

The former administrator of an environmental agency for a U.S. territory allegedly violated local and federal laws by entering into settlement agreements and accepting supplemental environmental projects with violators of environmental laws when determining enforcement actions. The investigation found that applicable policy and procedures were followed regarding the administrator's discretion over the administration of enforcement actions. The allegations were not supported.

CASE NUMBER: OI-AT-2018-CFD-0051

An investigation by the Federal Bureau of Investigation revealed that three individuals allegedly conspired to prevent the EPA from listing a Superfund site on the National Priorities List. The three individuals were convicted of conspiracy, bribery and wire fraud. Once the OIG was brought into the case, one individual and one associated business entity were debarred for 5 years from participation in federal procurement and non-procurement programs.

CASE NUMBER: OI-DE-2018-AFD-0071

A tribal member allegedly used an EPA grant-funded motor vehicle for personal use, including driving it to Canada. Investigation disclosed that the allegation was not supported.

CASE NUMBER: OI-AT-2019-AFD-0038

A local wastewater treatment authority that was awarded a Clean Water State Revolving Fund grant allegedly used the grant money as collateral to secure additional funds for projects. The allegation was not supported.

CASE NUMBER: OI-DA-2019-ADM-0041

A former employee of a state grant recipient allegedly falsified inspection information of facilities subject to Title V of the Clean Air Act while employed there, which was reported to the EPA. Investigators determined that EPA funds were not used for fraudulent purposes. The matter was referred to the state's OIG for action as deemed appropriate.

CASE NUMBER: OI-AT-2019-CFD-0057

An EPA contractor allegedly used foreign iron products on a project funded by a Drinking Water State Revolving Fund grant in violation of the American Iron and Steel Requirement. The investigation determined that there were no indications foreign iron materials were used on the project and a review of certifications and compliance documents did not reveal any anomalies. The allegation was not supported.

CASE NUMBER: OI-AT-2019-AFD-0067

A grantee allegedly misused EPA grant funds. After multiple requests from the EPA, the entity failed to submit required financial reports by the deadline. The investigation determined that the grantee's technical advisor had resigned and no grant funding had been expended in over a year. The EPA finance center received and processed the reports requested from the grantee. As a result, the grant was closed and the unobligated balance of funds returned to the EPA. The allegation was not supported.

CASE NUMBER: OI-SA-2017-OTH-0129

An EPA employee alleged another federal employee from an outside agency had sexually harassed the EPA employee and made harassing comments relating to the employee's national origin. The investigation was led by the OIG of the subject's agency, with the EPA OIG assisting. The allegations were not supported. The conduct was found to be unprofessional and obnoxious but did not rise to the level of harassment and did not violate any ethical standard.

CASE NUMBER: OI-SA-2019-OTH-0017

An EPA laptop was stolen at an airport while an EPA employee was on official government travel. Security footage confirmed that the laptop was stolen while the employee was going through security. All investigative leads were exhausted, the laptop could not be recovered, and the identity of the suspect could not be determined.

CASE NUMBER: OI-DA-2019-OTH-0018

An EPA laptop was stolen from an EPA employee's vehicle. Investigators were unable to locate the property or develop additional leads.

CASE NUMBER: OI-SA-2019-OTH-0032

An EPA laptop and Personnel Access and Security System identification badge were stolen from an EPA employee's rental vehicle. Investigators were unable to locate the property or develop additional leads.

CASE NUMBER: OI-SA-2019-PFD-0033

A contractor was allegedly posing as an EPA employee for personal gain. The contractor had been previously issued safety gear with the EPA logo while working on a state government contract involving the EPA. The contractor proceeded to wear the gear with the EPA logo while working on a separate contract with which the EPA was unaffiliated. The investigation determined that the contractor did not claim to be an EPA employee and no personal gains were made by the contractor. The allegation was not supported.

CASE NUMBER: OI-DA-2019-ADM-0055

An EPA-issued iPad and iPhone were stolen from an EPA employee's vehicle. Investigators were unable to locate the property or develop additional leads.

CASE NUMBER: OI-SA-2019-THT-0063

Two personal laptop computers were found abandoned inside an EPA-controlled room. Once all investigative leads were exhausted and the identity of the owner(s) could not be determined, the computers were sent for disposal.

CASE NUMBER: OI-RTP-2019-ADM-0070

An individual allegedly represented himself to be an EPA "senior agent" and used the authority from this position to have another individual banned from a casino. Subsequent interviews with casino management and security refuted the allegation. The allegation was not supported.

CASE NUMBER: OI-DA-2018-THT-0058

An individual allegedly made a verbal threat over the phone to an EPA contractor. The caller was identified and admitted to making the threat. The U.S. Attorney's office declined the case for prosecution.

CASE NUMBER: OI-HQ-2019-THT-0083

An EPA GS-13 employee allegedly made threatening statements to the employee's supervisor. The investigation was inconclusive.

Appendix 5—Peer Reviews Conducted

Audits

The U.S. Department of Defense OIG completed an external peer review of the EPA OIG audit organization covering the fiscal year ended September 30, 2017, and issued its report on June 18, 2018. The review was conducted in accordance with generally accepted government auditing standards and the Council of the Inspectors General on Integrity and Efficiency's *Guide for Conducting Peer Reviews of the Audit Organizations of Federal Offices of Inspector General*. The peer review report stated that the system of quality control for the EPA OIG audit organization in effect for the year ended September 30, 2017, was suitably designed and complied with to provide the EPA OIG with reasonable assurance that audits are performed and reported in conformity with applicable professional standards in all material respects. The EPA OIG received an external peer review rating of *pass*.

Investigations

The U.S. General Services Administration OIG completed the most recently mandated Council of the Inspectors General on Integrity and Efficiency quality assurance review of the EPA OIG Office of Investigations and issued its report on June 11, 2018. The U.S. General Services Administration OIG identified no deficiencies and found internal safeguards and management procedures compliant with quality standards.

On May 7, 2019, the EPA OIG completed its report on a quality assessment review of the investigative operations of the Special Inspector General for the Troubled Asset Relief Program in effect for the 3-year period ending September 30, 2018. We found that the Special Inspector General's system of internal safeguards and management procedures for the investigative function for the period reviewed was in compliance with applicable quality standards.

Appendix 6—OIG Mailing Addresses and Telephone Numbers

Headquarters

U.S. Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Ave., NW (2410T)
Washington, DC 20460
(202) 566-0847

Offices

Atlanta

U.S. Environmental Protection Agency
Office of Inspector General
61 Forsyth Street, SW
Atlanta, GA 30303
Audit/Evaluation: (404) 562-9830
Investigations: (404) 562-9857

Boston

U.S. Environmental Protection Agency
Office of Inspector General
5 Post Office Square (Mail Code: 15-1)
Boston, MA 02109-3912
Audit/Evaluation: (617) 918-1475
Investigations: (617) 918-1466

Chicago

U.S. Environmental Protection Agency
Office of Inspector General
77 West Jackson Boulevard
13th Floor (IA-13J)
Chicago, IL 60604
Audit/Evaluation: (312) 353-2486
Investigations: (312) 886-7167

Cincinnati

U.S. Environmental Protection Agency
Office of Inspector General
26 West Martin Luther King Drive
Cincinnati, OH 45268-7001
Audit/Evaluation: (513) 487-2363
Investigations: (312) 886-7167

Dallas

U.S. Environmental Protection Agency
Office of Inspector General – 4th Floor
1201 Elm Street
Dallas, TX 75270
Audit/Evaluation: (214) 665-6621
Investigations: (214) 665-2249

Denver

U.S. Environmental Protection Agency
Office of Inspector General
1595 Wynkoop Street, 4th Floor
Denver, CO 80202
Audit/Evaluation: (303) 312-6969
Investigations: (303) 312-6868

Kansas City

U.S. Environmental Protection Agency
Office of Inspector General
11201 Renner Boulevard
Lenexa, KS 66219
Audit/Evaluation: (913) 551-7878
Investigations: (913) 551-7420

New York

U.S. Environmental Protection Agency
Office of Inspector General
290 Broadway, Suite 1520
New York, NY 10007
Audit/Evaluation: (212) 637-3049
Investigations: (212) 637-3033

Philadelphia

U.S. Environmental Protection Agency
Office of Inspector General
1650 Arch Street, 3rd Floor
Philadelphia, PA 19103-2029
Audit/Evaluation: (215) 814-2326
Investigations: (215) 814-2359

Research Triangle Park

U.S. Environmental Protection Agency
Office of Inspector General
Mail Drop N283-01
Research Triangle Park, NC 27711
Audit/Evaluation: (919) 541-1030
Investigations: (919) 541-0517

San Francisco

U.S. Environmental Protection Agency
Office of Inspector General
75 Hawthorne Street (IGA-1-2)
8th Floor
San Francisco, CA 94105
Audit/Evaluation: (415) 947-4527
Investigations: (415) 947-4507

Seattle

U.S. Environmental Protection Agency
Office of Inspector General
Mail Code 17-H13
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3140
Audit/Evaluation: (206) 553-6906
Investigations: (206) 553-1273