



OFFICE OF INSPECTOR GENERAL

*Catalyst for Improving the Environment*

## **Evaluation Report**

# **EPA's Homeland Security Role to Protect Air from Terrorist Threats Needs to be Better Defined**

**Report No. 2004-M-000005**

**February 20, 2004**





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

February 20, 2004

**MEMORANDUM**

SUBJECT: Evaluation Report:  
EPA's Homeland Security Role to Protect Air from Terrorist Threats  
Needs to be Better Defined  
Report No. 2004-M-000005

FROM: Jeffrey K. Harris /s/  
Director for Program Evaluation, Cross-Media Issues

TO: Mary Kruger  
Director, EPA's Office of Homeland Security

Attached is a copy of the subject final report. This report is part of our ongoing evaluation of U.S. Environmental Protection Agency (EPA) activities to protect our nation from airborne terrorist threats. We focused on EPA's organizational framework for leading and coordinating its homeland security activities and identified an issue that requires your attention. Specifically, we believe EPA should clarify its homeland security role and responsibilities regarding air to enable it to properly prioritize and commit resources to its traditional and homeland security missions.

This review is one of a series of reviews to identify how effectively EPA is fulfilling its homeland security role and responsibilities, specifically in protecting the air from chemical or biological terrorism.<sup>1</sup> Our observations are based on information obtained from interviews with representatives from various EPA program offices and external stakeholders. We also reviewed public laws, presidential directives, EPA's *Strategic Plan for Homeland Security*, the White House Office of Homeland Security's *National Strategy for Homeland Security*, and many other pertinent documents. We are performing our evaluation in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States.

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<sup>1</sup> Chemical threats are the deliberate release of a toxic gas, liquid, or solid that can poison people and the environment. Biological threats are the deliberate release of biological substances that can cause illness or death. Many agents can be inhaled, enter through a cut in the skin, or be ingested.

## Action Required

You are requested to provide a written response to this report within 90 days of the report date. You should include a corrective action plan with agreed upon actions and milestone dates. We have no objections to the further release of this report. If you or your staff have any questions regarding this report, please contact me at 202-566-0831 or Lisa White at 215-814-2391. This report will be available at <http://www.epa.gov/oig/publications.htm>.

## EPA's Longstanding and Expanded Mission to Protect Public Health and the Environment

The Clean Air Act provides the principal framework for national, State, and local efforts to protect ambient (outdoor) air quality and designates EPA to set health-based standards, which control pollutants harmful to people and the environment. EPA's Strategic Plan states EPA is responsible to protect and improve the air so it is healthy to breathe and reduces risk to human health and the environment. Everyday, the average adult breathes over 3,000 gallons of air. Children breathe even more air per pound of body weight and are thus more susceptible to any type of air pollutant.

EPA does not have clear statutory authority to establish and enforce health-based regulatory standards for indoor air. However, EPA is given responsibility for cleaning up buildings and other sites contaminated by chemical or biological agents resulting from terrorism. This responsibility is designated to EPA by Presidential Decision Directive 62, signed in 1998, and the White House Office of Homeland Security's 2002 National Strategy for Homeland Security.<sup>2</sup>

Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) authorizes EPA to respond to releases of hazardous substances, pollutants, and contaminants. A response is coordinated under the National Contingency Plan (NCP), which is the implementing regulation for EPA's Superfund program and provides guidelines and procedures for responding. The NCP establishes the National Response Team, made up of 16 Federal agencies. The applicability of the NCP to biological terrorist incidents is derived from the "pollutant and contaminant" clause of CERCLA 104(a), which includes release or substantial threat of release into the environment of etiologic agents<sup>3</sup> and other substances presenting imminent and substantial danger to human health or welfare.

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<sup>2</sup> On October 8, 2001, President Bush established the Office of Homeland Security within the White House. The Homeland Security Act was signed by President Bush on November 25, 2002, and created the new Department of Homeland Security to provide overall coordination for anti-terrorism efforts. Even with the creation of the new Department, the White House Office of Homeland Security will continue to exist.

<sup>3</sup> Etiologic agents are those microorganisms that cause disease in humans and include bacteria, bacterial toxins, viruses, fungi, rickettsiae, protozoans, and parasites.

EPA has recently faced unprecedented challenges in responding to nationally significant incidents, including the World Trade Center and Pentagon terrorist attacks, and the anthrax contaminations. EPA was responsible for monitoring environmental conditions at the World Trade Center site, and for developing and carrying out a plan for anthrax decontamination at the Capitol Hill locations. New homeland security issues and challenges for EPA have necessitated a rigorous review of Agency options, decisions, actions, and performance.

EPA released its Strategic Plan for Homeland Security in September 2002. The goals of the strategic plan are organized into four mission-critical areas and include specific tactics to accomplish each goal. Under the Critical Infrastructure Protection area of the Plan, EPA has unique programmatic responsibilities and expertise related to the water and wastewater industries; the use, handling, storage, release, and disposal of chemicals and chemical wastes at industrial facilities; and indoor air quality.

**EPA Needs to Perform Responsibilities Designated by the Administrator**

EPA's Office of Homeland Security does not have a framework in place to carry out its responsibilities as designated by the Administrator. We acknowledge that EPA's Office of Homeland Security was recently created; however, the office was designed to be the central coordinating body for homeland security in the Agency as well as serving as a single point of entry for homeland security matters with other Federal departments and agencies.

In February 2003, the Administrator established EPA's Office of Homeland Security within the Office of the Administrator. The Administrator provided a list of responsibilities for the newly created office, which are included in the following table.

Responsibilities of EPA's Office of Homeland Security
Leading and coordinating homeland security activities and policy development across all program areas, including tracking implementation of the Agency's <i>Strategic Plan for Homeland Security</i> .
Coordinating regularly with senior leadership within the Agency.
Establishing a more centralized and efficient system for receiving and evaluating important classified communications from multiple sources.
Supporting program and regional offices' ability to "do business as usual," while absorbing new responsibilities.
Establishing a senior-level Policy Coordinating Committee, which will replace the Homeland Security Working Group.
Serving as a single point of entry for homeland security matters with other Federal departments and agencies.

We spoke to officials from EPA's Office of Homeland Security to determine whether there is an Agency-wide framework in place to effectively manage this effort. We focused on the organizational system using the Office of Inspector General's User Guide - Assessing Organizational Systems. This guide is a compilation of key program management practices consistent with the President's Management Agenda and the Government Performance and Results Act. At the time of our meeting, officials from EPA's Office of Homeland Security:

- were unable to identify all Agency-wide air homeland security responsibilities, goals, and expectations;
- did not have a system to coordinate efforts among EPA and other Federal agencies as well as external stakeholders; and
- could not ensure homeland security resources were being committed to the highest priorities.

We reviewed EPA's Strategic Plan for Homeland Security and found it has not clearly defined EPA's role and responsibilities related to airborne terrorist threats. Officials from EPA's Office of Homeland Security indicated the strategic plan is currently being revised because the initial plan, goals, tactics, and time frames were unrealistic as a result of funding not being provided for EPA to implement the plan. Discussions with the Office of Management and Budget validated EPA's view.

In May 2003, EPA's Office of Homeland Security officials informed us that they were in the process of hiring a contractor to create a database to track the efforts and progress of the Agency on homeland security issues. More recent discussion in October 2003 with EPA's Office of Homeland Security showed that this office is taking on a different role than originally planned. They are no longer hiring the contractor to create a database of homeland security efforts; rather, EPA officials are having internal discussions about creating a scaled-down version of the database. Officials from EPA's Office of Homeland Security also indicated their primary role will be to act as a liaison between EPA and the Department of Homeland Security so that the Department of Homeland Security now has a point of contact within EPA. They stated that before their office was created, it was difficult for external parties to know who to contact in EPA since EPA is organized by media, whereas the White House and Department of Homeland Security are organized by threat.

EPA's Office of Homeland Security was designated by the Administrator as the central coordinating body for homeland security; however, officials from this office could not identify the Agency-wide initiatives for homeland security for air. Therefore, we canvassed the agency to identify efforts currently underway. As shown in the following chart, EPA has several initiatives throughout various program offices aimed at protecting our nation's air from terrorist threats. We plan to conduct individual OIG evaluations on these specific programs and activities to identify how well EPA is carrying out its responsibilities and how EPA's efforts are being coordinated to effectively prevent, protect, respond to, and recover from such events.

<b>EPA's Office of Homeland Security</b> <b>Leads and coordinates homeland security efforts across all program areas</b>			
<b>Office of Solid Waste and Emergency Response -</b> Anthrax cleanups: <ul style="list-style-type: none"> <li>• Capital Hill, Brentwood, AMI, Hamilton, General Services Administration, Department of State</li> </ul>	<b>Office of Research and Development's National Homeland Security Research Center -</b> <ul style="list-style-type: none"> <li>• Safe Buildings Program</li> <li>• Rapid Risk Assessment Program</li> <li>• Environmental Technology Verification Program (ETV)</li> </ul>	<b>Office of Air and Radiation -</b> <ul style="list-style-type: none"> <li>• Building Air Protection Workgroup</li> <li>• BioWatch Program</li> </ul>	<b>Office of Prevention, Pesticides, and Toxic Substances -</b> <ul style="list-style-type: none"> <li>• Registration Process for Bioterror Decontaminants</li> </ul>
<b>Note: These initiatives were identified during our interviews with EPA's program offices and are not necessarily all-inclusive of the Agency's efforts in this area.</b>			

## Gaps Between EPA's Traditional and Homeland Security Roles Need to be Corrected

We found that some of EPA's homeland security roles and responsibilities related to air protection are limited and not well defined to enable EPA to be prepared for future events. In order to have a more coordinated, comprehensive approach to homeland security, EPA's Office of Homeland Security should first identify EPA's delegated homeland security responsibilities. Once they accomplished this task, they should then amass, track, and oversee all EPA homeland security efforts. Following are examples where gaps exist between EPA's traditional and homeland security roles. We believe the ambiguity of EPA's role limits EPA from accomplishing its mission of protecting human health and the environment.

### **BioWatch Program**

The Department of Homeland Security, in concert with EPA, Department of Energy, Department of Defense, and the Centers for Disease Control and Prevention, deployed an air sampling system to pre-existing monitoring stations across the United States in January 2003. This program, called BioWatch, is funded by the Department of Homeland Security and is designed to provide early detection of releases of select biological agents in the air through a comprehensive protocol of monitoring and laboratory analysis. According to EPA documentation describing the field sampling activities, the BioWatch Program is an ambient air particulate sampling and analysis program whose goal is to provide monitoring surveillance of biological contaminants at selected cities across the United States. Routine air samples are collected at various locations using EPA's Air Quality Monitoring Network operated in partnership with State, local, and tribal environmental agencies. According to EPA officials, the Agency's primary role is to coordinate with the State/local agencies for the use of the existing monitoring stations for the BioWatch program. As demonstrated in the following table and

confirmed through discussions with EPA officials, EPA plays a supporting role in BioWatch. This program is a Department of Homeland Security program implemented by the local governments in which BioWatch monitors are operating. As such, EPA has limited leverage over the program's ultimate success or failure. All threat information, release scenarios, and the justification for the program were prepared by the Department of Homeland Security, not EPA.

Traditional Role	Homeland Security Role	Gaps
<p><b>Clean Air Act</b> requires EPA to set limits on how much of a pollutant can be in the air anywhere in the United States. This enables all Americans to have the same basic health and environmental protections. EPA is responsible for setting standards, which control pollutants harmful to people and the environment. The agency has regulated pollutants by developing health-based criteria (science-based guidelines) as the basis for setting permissible levels.</p> <p>EPA's Strategic Plan echoes the Clean Air Act and states that EPA is responsible to protect and improve the air so it is healthy to breathe and reduces risk to human health and the environment.</p>	<p><b>BioWatch Program</b> - Through an Interagency Agreement, EPA is responsible for the field portion of this program including field deployment and sampling component.</p> <p>However, the Department of Homeland Security is the prime decision maker in:</p> <ul style="list-style-type: none"> <li>• selecting cities for sampling,</li> <li>• making resources available to implement the program,</li> <li>• setting program priorities and direction,</li> <li>• coordinating communication among all cooperating agencies, and</li> <li>• ultimately insuring appropriate implementation of the program.</li> </ul>	<p>1) Because the public recognizes EPA as the primary agency designated to protect our nation's air, and EPA's role is to facilitate the air sampling portion of the program, EPA, not the Department of Homeland Security, could be held accountable by the public for environmental issues as a result of this program.</p> <p>2) Segmented roles and responsibilities could lead to lack of accountability for the program.</p>

### ***Anthrax Response***

Another example where gaps exist between EPA traditional and homeland security roles is the response to releases of anthrax. Anthrax poses an imminent and substantial threat to human health and the environment. Inhalation anthrax is one of the most serious forms of anthrax and was the cause of illness and deaths in late 2001. According to EPA officials, there are currently five anthrax-contaminated buildings that have an EPA On-Scene Coordinator<sup>4</sup> assigned. At the time of our interviews, 2 years after the contaminations, most of these buildings have not been declared safe to re-enter. EPA is not the lead agency for these sites; instead, the EPA On-Scene Coordinator is there to provide oversight and technical assistance to the building owner. Although EPA was heavily involved in the anthrax response on Capital Hill, EPA's involvement varied depending on the building.

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<sup>4</sup> The On-Scene Coordinator is the Federal official pre-designated by EPA or the Coast Guard to coordinate and direct the response.



As shown in the following table, since the September 11, 2001, and the anthrax incidents, EPA's responsibilities for emergency response have become ambiguous, and questions remain about EPA's role in future events.

Traditional Role	Homeland Security Role	Gaps
<p>The <b>Federal Response Plan</b> describes the responsibilities of Federal departments following a Presidential declaration of a major disaster or emergency. This plan designates EPA, under Emergency Support Function #10, as the primary agency to provide Federal support to State and local governments in response to an actual or potential discharge and/or release of hazardous materials following a major disaster or emergency.</p> <p>The <b>National Contingency Plan (NCP)</b> states that if something happens on or from a Federal facility (such as a hazardous release), and it is an emergency, EPA is the On-Scene Coordinator lead. Once the event is determined to be under control, it is recognized as a non-emergency, therefore being the responsibility of the Federal facility (building owner) to conduct the cleanup.</p>	<p>The White House Department of Homeland Security's <b>National Strategy for Homeland Security</b> designates EPA, in the event of a national incident, with the lead responsibility for decontaminating affected buildings and neighborhoods and providing advice and assistance to public health authorities in determining when it is safe to return to these areas.</p> <p><b>The Initial National Response Plan</b> was prepared to enhance the ability of the United States to prepare for and manage domestic incidents by establishing a single, comprehensive national approach. In this plan, the Hazard Management functional area refers to technical structures and systems that prepare for and respond to chemical, biological, radiological, nuclear, and explosive incidents regardless of the cause. The Department of Homeland Security is designated the primary Federal Agency and EPA is listed as a support agency. Since our initial review of the plan, it has been revised and no longer designates Federal leads for specific types of incidents. However, the plan has not been made final. The Department of Homeland Security is in the process of developing the final plan, which should specify leads for different types of incidents.</p>	<p>1) EPA On-Scene Coordinators informed us that they do not have the authority or resources to lead in cleaning up anthrax-contaminated buildings as designated by the White House National Strategy. EPA officials indicated that the lines of authority among agencies and EPA's individual role varied depending upon the agencies involved.</p> <p>2) Activation of the Federal Response Plan is dependant on Presidential declaration. The Plan was not activated for anthrax incidents.</p> <p>3) There is a potential disconnect between the Initial National Response Plan and existing plans over lead agency roles.</p>

An EPA report, *Challenges Faced During the Environmental Protection Agency's Response to Anthrax and Recommendations for Enhancing Response Capabilities - A Lessons Learned Report*, dated September 2002, substantiates that questions about EPA's roles and responsibilities exist. The report states that although CERCLA and the NCP provide authority to respond to biological incidents, the NCP does not include a response plan for such incidents, and the Federal Response Plan

was not activated to coordinate the agencies involved in the response to anthrax on Capitol Hill. The report further states that in the absence of the Federal Response Plan activation, there was not a clear structure defining the interaction of the various agencies involved.

### **Priorities Need to Be Based on EPA's Defined Role**

We believe well defined roles and responsibilities should act as the drivers and motivation for the Agency's homeland security efforts, including the research initiated in support of homeland security needs. Recently, EPA established the National Homeland Security Research Center. The Center's mission, over its proposed 3-year life, is to focus on methods to clean up contaminated buildings, protect the nation's drinking water supplies, and improve risk assessment methods that protect emergency responders and inform local decision makers. The Center's Safe Buildings Program focuses on biological and chemical hazards in the indoor environment. Program officials have prepared a research action plan to produce technologies and guidance needed by building owners and managers, emergency responders, decontamination crews, and waste disposal personnel.

The President's Management Agenda states that science and technology are critically important to keeping our nation's economy competitive and for addressing challenges we face in health care, defense, energy production and use, and the environment. As a result, every Federal research and development dollar must be invested as effectively as possible. The National Academy of Sciences peer reviewed EPA's draft Safe Buildings Program research action plan. The National Academy of Sciences indicated that the primary areas of research associated with an effective building decontamination strategy are presented in the plan; however, the program time frame is too short to effectively accomplish all the goals set forth in the plan. The report states that EPA has expertise in the area of decontamination and disposal and should focus the remaining time of the program toward improving these aspects of its work. Again, we believe EPA should first identify its delegated homeland security role and responsibilities and then prioritize and proceed with its research efforts.

### **Conclusion**

Because EPA's air-related homeland security activities are cross-media and housed in various program offices, EPA's Office of Homeland Security should oversee and track these activities to assess their progress and review the results of their investment. Also, many homeland security initiatives require coordinated efforts of two or more agencies; hence, steps should be taken to prevent program overlap and ensure all crosscutting agency efforts are well coordinated.

Clearly defined roles and responsibilities enable EPA officials to effectively perform their duties in meeting the challenges EPA faces in protecting the nation against the threat of terrorism. EPA emergency response expertise has been relied on in responding to significant incidents, including the World Trade Center and Pentagon terrorist attacks, and the anthrax contaminations. Gaps that exist

between EPA's traditional and homeland security roles cause uncertainty and could complicate or delay a response should a future incident occur.

## **Recommendations**

We recommend that EPA's Office of Homeland Security:

1. Clarify EPA's future role and responsibilities to enable it to properly prioritize and commit resources to its traditional and homeland security missions.
2. Establish and maintain a database to oversee and track the progress for all EPA homeland security efforts.

## **Agency Response and Office of Inspector General Evaluation**

EPA provided comments to our draft report and, where appropriate, we made revisions. We included EPA's response as Appendix A. We did not include the attachment to the Agency's response, but addressed the issues as appropriate.

EPA generally agreed with our recommendations citing the need for clarification of EPA's future homeland security role and responsibilities, and of establishing a system to monitor the progress of EPA's homeland security efforts. The response does include a list of actions currently underway, including updating the *Homeland Security Strategic Plan* and holding weekly information sessions with EPA program offices. In response to the final report, EPA's Office of Homeland Security should submit a timeline for completion of its actions.

EPA's response is unclear on its position regarding EPA's role in emergency response. For example, EPA indicated its role in responding to terrorist incidents is not, and should not, be the same in all cases, and this is consistent with the National Response Plan. We agree. However, further in the response, EPA disagrees with our report noting that there are potential gaps between EPA's traditional and homeland security roles as they relate to emergency response. The response further states that EPA is participating on the writing group developing the new National Response Plan, and has raised the potential for inconsistencies between the role of the On-Scene Coordinator and the Primary Federal Official.

Also, EPA stated it would clarify the roles and responsibilities of EPA's Office of Homeland Security and the distinction between the responsibilities delegated to EPA's Office of Homeland Security versus those that remain with EPA's Program Offices and Regional Offices. However, it stops short of clarifying any role other than that of EPA's Office of Homeland Security. Our report does not claim that EPA's Office of Homeland Security does not know its responsibilities; rather, we believe this office is not fulfilling its responsibilities as delegated by the EPA Administrator.

Finally, EPA stated it remains committed to actively implementing responsibilities that are clearly delegated to EPA pursuant to Homeland Security Presidential Directives and national response plans and structures. The response further states it is important to recognize that homeland security is a new and evolving priority for EPA and many other Federal agencies, including the Department of Homeland Security. We recognize that homeland security is a new priority, which is why it is essential for EPA to take the initiative, be proactive, and ensure that the responsibilities for which it is most experienced remain in its jurisdiction. We do not believe it is clear what homeland security responsibilities are delegated to EPA. It is important for EPA's Office of Homeland Security to determine the Agency's delegated role, because uncertainty could complicate or delay a response should a future incident occur.

## ***EPA Response***

January 20, 2004

### **MEMORANDUM**

**SUBJECT:** Draft Evaluation Memorandum: EPA's Homeland Security Role to Protect Air from Terrorist Threats Must be Better Defined  
Assignment No. 2003-000699

**TO:** Jeffrey K. Harris  
Director for Program Evaluation, Cross-Media Issues

**FROM:** Mary U. Kruger  
Director, Office of Homeland Security

This memorandum provides the comments of the Administrator's Office; Offices of Air and Radiation, Research and Development, and Solid Waste and Emergency Response; as well as Regions 2 and 3, on the draft evaluation of EPA's homeland security role to protect air.

We support the goal of clarifying EPA's future role and responsibilities with respect to the protection of air and support the establishment of a system to monitor the progress of EPA homeland security efforts. In support of these goals, a number of actions are currently underway.

- The *Homeland Security Strategic Plan* update is nearing completion and is currently undergoing a quality control review. The updated *Plan* should be submitted to the EPA Administrator in early Calendar Year 2004.
- Following completion of the *Homeland Security Strategic Plan* update, the Office of Homeland Security (OHS) will develop a system to monitor progress on commitments in the Plan and assist with implementation, as appropriate.
- OHS holds weekly information sharing sessions that provide a forum for all EPA programs with homeland security responsibilities to share information on ongoing and special projects, homeland security meetings, and other homeland security-related activities.
- The OHS Director has visited nearly all regions and met with Regional Administrators and Deputy Regional Administrators, as well as Regional Incident Coordination Teams, to clarify OHS's role, discuss Administration and Agency-wide priorities, and learn about regional-specific issues.
- Region 3 was recently designated as the Lead Region for Homeland Security. Region 6 was designated as the Back-up to Region 3. OHS has met with Regions 3 and 6 to flesh-out the Lead Region responsibilities, and Regions 3 and 6 are now working with the other regions to solicit additional input.

- OHS works collaboratively with the Program Offices, laboratories, Regions, and the Administrator's Homeland Security Policy Coordination Committee on matters related to homeland security policy development.

OHS remains committed to actively implementing responsibilities that are clearly delegated to EPA pursuant to Homeland Security Presidential Directives and national response plans and structures. However, it is important to recognize that homeland security is a new and evolving priority for EPA and for many other federal agencies, including the Department of Homeland Security (DHS).

Your Report states that EPA's responsibilities for emergency response have become ambiguous, and questions remain about our role in future events. EPA's role in responding to terrorist incidents is not, and should not, be the same in all cases. As seen in the various anthrax cleanups, EPA may lead the response or provide oversight and/or technical assistance, depending on the specific circumstances. This is consistent with the National Contingency Plan, which provides EPA with the authority to lead responses (1) where there is an emergency situation, (2) when the response is not being conducted effectively, or (3) when the capabilities of the responsible party are exceeded. Additionally, EPA is a participant on the writing group developing the new National Response Plan, and has raised the potential for inconsistencies between the role of the On-Scene Coordinator and the Primary Federal Official. With discussions currently underway, at this point it would be inappropriate to speculate on the final resolution of this issue.

Finally, I would like to clarify the roles and responsibilities of the Office of Homeland Security and the distinction between the responsibilities delegated to OHS versus those that remain with the Program Offices and EPA Regional Offices. OHS is responsible for:

- Ensuring implementation of the Agency's Homeland Security Strategic Plan;
- Facilitating and coordinating homeland security policy development across the Agency;
- Serving as primary liaison and representative, as appropriate, for senior officials in the Department of Homeland Security and White House Homeland Security Council;
- Serving as a primary liaison for senior officials at other federal agencies with responsibilities for homeland security;
- Serving as primary liaison on matters relating to homeland security among AO, Headquarters program offices, Regional offices, and EPA laboratories; and
- Establishing a more centralized and efficient system for receiving and evaluating important classified communications from multiple sources.

In reviewing the draft report we identified a number of issues and statements that we feel need to be corrected and/or clarified. The attached table reflects these suggestions and clarifications. If you have any questions, please contact Laura Flynn of my staff at 202 564-4611.

cc: S. Johnson  
T. Gibson  
R. McKeown

## ***Distribution List***

### **EPA Headquarters**

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