



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

OFFICE OF  
INSPECTOR GENERAL

October 15, 2019

**MEMORANDUM**

**SUBJECT:** Notification of Audit:  
EPA's Oversight of Synthetic Minor Sources  
Project No. OA&E-FY19-0093

**FROM:** James L. Hatfield, Director, Air Directorate  
Office of Audit and Evaluation

A handwritten signature in red ink that reads "James L. Hatfield".

**TO:** Anne Idsal, Acting Assistant Administrator  
Office of Air and Radiation

Susan Parker Bodine, Assistant Administrator  
Office of Enforcement and Compliance Assurance

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin fieldwork on this audit. This audit is included in our annual plan.

The OIG's objective is to determine whether oversight is sufficient within the EPA and state and local agencies to assure that synthetic minor sources of air emissions comply with the emission or operational limits in their air permits. Sources of air emissions that are potentially major sources are allowed to operate as minor sources when they agree to some sort of restriction (such as limiting their operating hours or installing control equipment) that reduces their actual emissions. Such facilities are labeled "synthetic" minor sources.

The OIG plans to conduct work at the Office of Air and Radiation at headquarters and Research Triangle Park, North Carolina; at the Office of Enforcement and Compliance Assurance at headquarters; and at selected EPA regions and state and local agencies as needed. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefits of this project include improving any identified weaknesses in the EPA's oversight of synthetic minor sources so that the EPA can better assess facility compliance with permitted emission or operational limits.

We will contact you to arrange a mutually agreeable time to discuss our objective. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please be ready to provide the following information at the entrance conference:

- Identification of any investigations or legal proceedings that are in process that are significant to the audit objective.
- EPA policies, procedures and guidance related to synthetic minors and the EPA's oversight of synthetic minor sources.
- Access to any EPA database(s) to which EPA regions, state/local agencies, or individual facilities report required compliance information for synthetic minor sources.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. We will request that you resolve the situation if an agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the *Semiannual Report to Congress*.

I will supervise the audit and the Project Manager will be Erica Hauck. Any information related to the project should be addressed to Jim Hatfield at (919) 541-1030 or [hatfield.jim@epa.gov](mailto:hatfield.jim@epa.gov), or Erica Hauck at (303) 312-6629 or [hauck.eric@epa.gov](mailto:hauck.eric@epa.gov).

cc: Henry Darwin, Assistant Deputy Administrator  
 Doug Benevento, Associate Deputy Administrator  
 Ryan Jackson, Chief of Staff  
 Michael Molina, Deputy Chief of Staff  
 Kevin DeBell, Acting Deputy Chief of Staff  
 Elizabeth Shaw, Deputy Assistant Administrator for Air and Radiation  
 Lawrence Starfield, Principal Deputy Assistant Administrator for Enforcement and Compliance Assurance  
 Marc Vincent, Audit Follow-Up Coordinator, Office of Air and Radiation  
 Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance  
 Annette Morant, Agency Follow-Up Coordinator  
 Corry Schiermeyer, Associate Administrator for Public Affairs  
 Regional Audit Follow-Up Coordinators, Regions 1–10  
 Charles J. Sheehan, Deputy Inspector General  
 Edward Shields, Associate Deputy Inspector General  
 Eric Hanger, Deputy Counsel to the Inspector General  
 Kevin Christensen, Assistant Inspector General for Audit and Evaluation  
 Helina Wong, Assistant Inspector General for Investigations  
 Stephanie Wright, Acting Assistant Inspector General for Management  
 Richard Eyermann, Deputy Assistant Inspector General for Audit and Evaluation  
 Christine El-Zoghbi, Deputy Assistant Inspector General for Audit and Evaluation  
 Rashmi Bartlett, Deputy Assistant Inspector General for Audit and Evaluation  
 Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs  
 Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General  
 Tia Elbaum, Congressional and Media Liaison, Office of Inspector General