

Office of Inspector General Reports

Summery

1. Office of Inspector General's (OIG) Report No. 2000-P-10 **March 20, 2000:** "EPA performs few biosolids related inspections of POTW operations, virtually no inspections of land application sites, and few records inspections at POTWs or land applicers. EPA regions do not maintain data on the cumulative amounts of pollutants at land application sites, even though Part 503 requires maintaining this data. There is no regional oversight of septage land application. The biosolids program has been delegated to only three states, and there is virtually no federal oversight of state biosolids programs in non-delegated states. Therefore, EPA does not have sufficient information to determine compliance levels with the Part 503 regulatory requirements. This almost complete absence of a federal presence in the biosolids program results from the low priority given to biosolids management by EPA's Office of Water (OW), and the decision of EPA's Office of Enforcement and Compliance Assurance (OECA) not to commit enforcement resources to biosolids. This may result in increased **RISKS** to the environment and human health, and cause a loss of public confidence in the biosolids program."

2. OIG Report No. 2004-P-10 **September 28, 2004:** (You will see how well EPA has been doing in the final attached report no 14-P-0363). Preventing industrial pollutants from interfering with wastewater treatment facility operations or passing through facilities untreated into water bodies are functions of EPA's pretreatment program. It is a core part of the Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. The Agency considers the pretreatment program successful in reducing discharges of harmful pollutants, and this has resulted in less resources and attention being directed toward this program in recent years. However, toxic pollutants are still being transferred to sewage treatment plants, and the impact to human health and the environment of some of these pollutants may still not be known. (The one **RISK** factor never considered by the EPA is the human condition. Following regulations costs. Regulating costs.)

3. OIG Report No. 10-P-0066 **February 17, 2010:** EPA does not have integrated procedures and measures in place to ensure that new chemicals entering commerce do not pose an unreasonable **RISK** to human health and the environment. We found that EPA's New Chemicals Program had limitations in three processes intended to identify and mitigate new **RISKS** – assessment, oversight, and transparency. The program is limited by an absence of test data and a reliance on modeling because TSCA does not require upfront testing as part of a Premanufacture Notice (PMN) submission. PMN submitters are required to submit health and safety data in their possession and a description of data known to or reasonably ascertainable by the submitter at the time of its submission. Nonetheless, the majority of PMN submissions do not include

chemical toxicity or environmental fate data. Oversight of regulatory actions designed to reduce known **RISKS** is a low priority, and the resources allocated by EPA are not commensurate with the scope of monitoring and oversight work. In addition, EPA's procedures for handling confidential business information requests are predisposed to protect industry information rather than to provide public access to health and safety studies.

4. OIG Report No. 12-P-0508 **May 25, 2012**: Since 1980, EPA has not used its RCRA authority to determine whether pharmaceuticals may qualify as hazardous waste. EPA also has not established a process for the regular identification and review of pharmaceuticals that may qualify for regulation as hazardous waste. Without a regular process, EPA cannot provide assurance that pharmaceuticals that may pose a hazardous **RISK** to human health and the environment have been identified. We identified eight chemicals found in pharmaceuticals that meet EPA's criteria for regulation as acute hazardous waste, but wastes containing these chemicals are not regulated as such. There are over 100 drugs that federal occupational safety organizations have identified as hazardous but may not have been reviewed by EPA to determine whether they may qualify as hazardous waste. EPA staff stated they have started examining these drugs for listing as hazardous waste. Further, the state of Minnesota recently noted that there has been a proliferation of pharmaceutical development since RCRA regulations were established. Our review has identified a **RISK** that there are unknown but potentially dangerous unregulated HWPs that may be unsafely disposed and released into the environment.

5. OIG Report No 14-P-0363 **September 29, 2014**: Management controls put in place by the EPA to regulate and control hazardous chemical discharges from sewage treatment plants to water resources have limited effectiveness. The EPA regulates hazardous chemical discharges to and from sewage treatment plants, but these regulations are not effective in controlling the discharge of hundreds of hazardous chemicals to surface waters such as lakes and streams. Sewage treatment plant staff do not monitor for hazardous chemicals discharged by industrial users. This is due to a general regulatory focus on the priority pollutants list that has not been updated since 1981, limited monitoring requirements, limited coordination between EPA offices, a lack of tracking hazardous waste notifications required for submittal by industrial users, or a lack of knowledge of discharges reported by industrial users under the Toxics Release Inventory. Except for EPA Region 9, sewage treatment plant permits generally include very few monitoring requirements or effluent limits, which can limit enforcement actions.

Comment:

If there are discharges to lakes, streams and air of hazardous chemicals then the concentrated hazardous contaminates of Bio Solids would be greater than effluent or atmospheric discharges.

This would make the uninformed farmer and land owner who receives bio-solids literally hazardous waste dumps which would be the largest sources of ground to surface water and atmospheric discharges of these chemicals.