



REGION 4 ADMINISTRATOR

ATLANTA, GA 30303

July 10, 2024

MEMORANDUM

SUBJECT: Response to Office of Inspector General Report No. 24-E-0046 *The EPA Should Improve Oversight of Physical Access and Institutional Controls at the Escambia Wood Superfund Site*, Dated June 12, 2024

FROM: Jeaneanne M. Gettle
Acting Regional Administrator

TO: Sean W. O'Donnell, Inspector General
Office of Inspector General

Thank you for the opportunity to respond to the subject Office of Inspector General (OIG) final audit report. Region 4 responded to the recommendations and draft report in a response memorandum dated March 25, 2024. The OIG has identified two recommendations as unresolved (Recommendations 1 and 3). We have provided proposed corrective actions below for the unresolved recommendations.

REGION'S OVERALL POSITION

As we indicated in our previous memorandum regarding this site, the Region agrees with the recommendations, is aware of the need for these improvements, and is working to implement them. Region 4 will take all necessary steps to ensure appropriate ICs are in place where needed. The Region works closely with the city and county governments and the Florida Department of Environmental Protection (FDEP). In April 2024, the County notified FDEP that campers have been removed from the site, and the site is being monitored to prevent future recurrences. The County has also repaired the fences around the containment cell, a remedy component, and has taken additional actions to implement and enforce the ICs. The Region will continue to provide oversight of the ICs as long as they remain part of the selected remedy through regular communication with our local and State partners.

The Agency appreciates the input of the OIG on how to best protect and leverage the Infrastructure Investment and Jobs Act (IIJA) funds that will be used to implement the remedy at this site. Please see the Region's response to the unresolved OIG recommendations below.

RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
1	Ensure state and local partners implement and enforce existing institutional controls at the Escambia Wood Superfund site, including institutional controls prohibiting residential or recreational use of site parcels. This action will reduce the potential for exposure to contaminated soil, protect the remedy the EPA has already spent \$140 million on, and create conditions to ensure effective use of the \$40 million in Infrastructure Investment and Jobs Act funding for groundwater remediation.	The Region is working closely with state and local partners to implement and enforce existing controls at the Escambia Wood Superfund site, including institutional controls prohibiting residential or recreational use of site parcels. The County has removed campers from the site, has performed regular inspections at the site, has mended holes in fences, and has taken other steps to implement and enforce the institutional controls at the site. The Region held a meeting with FDEP on June 25, 2024, to discuss the institutional controls and ongoing implementation and enforcement at the site. The Region is planning a site visit on July 29, 2024, with FDEP and the County to review the Institutional Controls together and to inform needed clarifications to the O&M plan. The Region has also developed and is finalizing a Standard Operating Procedure (SOP) for implementing and maintaining Institutional Controls for use at Region 4 Sites. When completed, the SOP will ensure that ICs are properly implemented and maintained at the Escambia Wood Site and other Region 4 sites where ICs are needed.	Finalization of the SOP and the IC coordination meeting with the County and FDEP will both take place in the 4 th Quarter 2024 (September 30, 2024).
3	Ensure the appropriate parties perform adequate operation and maintenance of the remedy consistent with the Operations and Maintenance Plan, including inspection, maintenance, and repair of fencing.	The Region agrees with this revised recommendation. The O&M Plan is being updated to clearly explain what is required to protect remedial components, such as the containment cell, manhole covers, and monitoring wells after recommendations 1 and 2 are addressed.	The O&M plan will be finalized after recommendations 1 and 2 are addressed. Estimated completion date is September 30, 2024.

CONTACT INFORMATION

If you or your staff have any questions regarding this response, please contact the Region 4 Audit Follow-Up Coordinator, Alicia Sterk, at Sterk.Alicia@epa.gov or (801) 678-6168.

Attachment

cc: Lindsay Clarke Brubaker, OIG
Kimberley Lake De Pulla, OIG
Caroline Freeman, Region 4
Randall Chaffins, Region 4
Alicia Sterk, Region 4
Kecia Thornton, OLEM