Three concerns were raised by participants during the workshop:

The first was for a potential ethical standards violation. The second two regarded inspection procedures. The participants who raised these concerns noted that the incidents involved EPA contractors rather than EPA employees.

On the ethical issue.
The individual who raised the concern would not provide any detail beyond “an ethical issue” --- no date, site name, contractor name, etc. Assurances were given to the workshop presenters from the Contracting Officer’s Representative (COR) that all introductory briefings with the contractors will include strong discussions on ethical adherence, as well as professional business practices (which relate to the two subsequent concerns).

The first procedural concern - The proper identification of and use of credentials.
There was an instance where an inspection team had two trainees in addition to the inspector. All authorized contract persons will have a letter of introduction and a credential letter that authorizes them individually to be EPA’s representative for the hazardous waste inspection. The contractor is to present the credential and give both the EPA COR’s business card and the letter of introduction to facility representatives at the inspection in-briefing. It was unclear from the person raising the concern if the trainees were listed on these letters. A facility is welcome to keep and even copy the letter of introduction, but not the credential letter.

The second procedural concern - regarding report production.
A report should be produced and delivered to EPA typically within 30 calendar days of the inspection and within a week or so thereafter to the facility. The inspector (be it EPA or contractor) understands that it is appropriate to connect with the facility during regular working hours, including telephone and email exchanges.

If an EPA contractor ever gives the perception of poor performance or ethical concern, please contact the EPA COR (whose business card was provided) or any EPA staffer – including Marcus Rivas and Rebecca Wenner. We take the public trust in regulatory affairs as a sacred matter. We will respond. If the person believes we are non-responsive, we encourage them to go to our management or our Inspector General.