



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

OFFICE OF  
INSPECTOR GENERAL

February 22, 2022

**MEMORANDUM**

**SUBJECT:** Notification of Audit:  
Benzene Fenceline Monitoring at Refineries  
Project No. OA-FY22-0070

**FROM:** Tina Lovingood, Director *Christina Lovingood*  
Pollution Control and Cleanup Directorate  
Office of Audit

**TO:** Joseph Goffman, Acting Assistant Administrator  
Office of Air and Radiation

Lawrence Starfield, Acting Assistant Administrator  
Office of Enforcement and Compliance Assurance

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin fieldwork on an audit of the EPA's benzene fenceline monitoring program for petroleum refineries. This audit is part of the OIG's [oversight plan](#) for fiscal year 2022. This audit also addresses the following fiscal year 2022 [top management challenges](#) for the Agency:

- Enforcing environmental laws and regulations.
- Integrating and leading environmental justice, including communicating risks.

The OIG's objective is to determine to what extent oversight of the benzene fenceline monitoring program by the EPA and delegated state and local agencies assures that refineries take corrective action and lower benzene, as required, when measured benzene concentrations exceed the action level. The benzene fenceline monitoring program is intended to assure that petroleum refineries that exceed a certain annual average benzene concentration, known as the action limit, at their perimeter or fenceline take corrective actions to lower their benzene concentrations, as required by EPA regulations. Benzene is a chemical released from refineries and is known to cause cancer and other serious health effects.

The OIG plans to conduct work at EPA headquarters, selected EPA regions, and delegated state and local agencies. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefits of this audit are improved operational efficiency and greater human health and environmental protections.

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.

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. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials 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*.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Janet McCabe, Deputy Administrator  
Dan Utech, Chief of Staff, Office of the Administrator  
Wesley J. Carpenter, Deputy Chief of Staff, Office of the Administrator  
Elizabeth Shaw, Deputy Assistant Administrator for Air and Radiation  
Peter Tsirigotis, Director, Office of Air Quality Planning and Standards, Office of Air and Radiation  
Rosemarie Kelley, Director, Office of Civil Enforcement, Office of Enforcement and Compliance Assurance  
John Dombrowski, Acting Director, Office of Compliance, Office of Enforcement and Compliance Assurance  
Marc Vincent, Audit Follow-Up Coordinator, Office of Air and Radiation  
Eleanor Marusiak, Backup Audit Follow-Up Coordinator, Office of Air and Radiation  
Eunjee Koh, Backup Audit Follow-Up Coordinator, Office of Air and Radiation  
Grant Peacock, Backup Audit Follow-Up Coordinator, Office of Air and Radiation  
Gwendolyn Spriggs, Audit Follow-up Coordinator, Office of Enforcement and Compliance Assurance  
Andrew LeBlanc, Agency Follow-Up Coordinator  
José Kercado, Backup Agency Follow-Up Coordinator  
Lindsay Hamilton, Associate Administrator for Public Affairs  
Lance McCluney, Director, Office of Administrative and Executive Services, Office of the Administrator  
Regional Audit Follow-Up Coordinators, Regions 1–10  
Sean W. O’Donnell, Inspector General  
Charles J. Sheehan, Deputy Inspector General  
Edward S. Shields, Associate Deputy Inspector General  
Benjamin May, Counsel to the Inspector General  
Stephanie Wright, Assistant Inspector General for Management  
Kellie J. Walker, Acting Deputy Chief of Staff, Office of Inspector General  
Katherine Trimble, Assistant Inspector General for Audit  
Paul H. Bergstrand, Assistant Inspector General for Special Review and Evaluation  
Marc Perez, Acting Assistant Inspector General for Investigations  
Jee Kim, Deputy Assistant Inspector General for Management  
Tom Collick, Deputy Counsel to the Inspector General

Laura B. Nicolosi, Principal Deputy Assistant Inspector General for Audit  
Erin Barnes-Weaver, Deputy Assistant Inspector General for Evaluation  
Susan Barvenik, Associate Deputy Counsel to the Inspector General  
James Hatfield, Associate Deputy Assistant Inspector General for Audit  
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs  
Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General  
Lori Hoffman, Congressional and Media Liaison, Office of Inspector General