

# EXHIBIT 2



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

*Cleaning up and revitalizing land*

# **EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and the Environment**

Report No. 19-P-0002

November 15, 2018



## **Status of Recommendations and Potential Monetary Benefits**

### RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	26	Utilizing existing tools and capabilities, implement a method or approach to better capture and analyze biosolids inspections data in the EPA's data system of record for any biosolids inspection activities that are conducted during the National Pollutant Discharge Elimination System permit inspections.	R	Assistant Administrator for Water and Assistant Administrator for Enforcement and Compliance Assurance	6/30/19	
2	26	Establish a nationally consistent and measurable goal for biosolids inspections and nationally consistent desk audit requirements that apply equally to the EPA and authorized states.	R	Assistant Administrator for Water and Assistant Administrator for Enforcement and Compliance Assurance	3/31/19	
3	26	Complete development of the probabilistic risk assessment tool and screening tool for biosolids land application scenarios.	R	Assistant Administrator for Water	12/31/21	
4	26	Develop and implement a plan to obtain the additional data needed to complete risk assessments and finalize safety determinations on the 352 identified pollutants in biosolids and promulgate regulations as needed.	R	Assistant Administrator for Water	12/31/22	
5	26	Complete and publish all future biosolids biennial reviews, including the 2017 biennial review, prior to the next review required by the Clean Water Act.	R	Assistant Administrator for Water	12/31/18	
6	26	Publish guidance on the methods for the biosolids pathogen alternatives 3 and 4.	R	Assistant Administrator for Water	12/31/20	
7	26	Issue guidance on what new technologies are allowable options or alternatives for biosolids pathogen reduction.	U	Assistant Administrator for Water		
8	26	Issue updated and consistent guidance on biosolids fecal coliform sampling practices.	R	Assistant Administrator for Water	12/31/20	
9	26	Change the website response to the question "Are biosolids safe?" to include that the EPA cannot make a determination on the safety of biosolids because there are unregulated pollutants found in the biosolids that still need to have risk assessments completed. This change should stay in place until the EPA can assess the risk of all unregulated pollutants found in biosolids.	U	Assistant Administrator for Water		
10	27	Modify the EPA's website responding to public questions on the safety of biosolids to: (a) identify unregulated pollutants found in biosolids, (b) disclose biosolids data gaps, and (c) include descriptions of areas where more research is needed. Make similar revisions in other EPA-published documents that include a response to the question "Are biosolids safe?" These changes should stay in place until the EPA can assess the risk of all unregulated pollutants found in biosolids.	U	Assistant Administrator for Water		
11	27	Determine whether the impact on the safety and protection of human health justifies a requirement to include a general disclaimer message on the biosolids labels and information sheets regarding unregulated pollutants and a referral to the website for additional information. Publish the rationale for the determination on the EPA biosolids website.	U	Assistant Administrator for Water		

**RECOMMENDATIONS**

Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
12	27	Conduct regular biosolids training and conference calls or meetings for regional and state staff and wastewater treatment operators to improve consistency in rule interpretation and aid in knowledge transfer.	R	Assistant Administrator for Water	12/31/19	
13	27	In addition to EPA technical biosolids trainings or conferences, start and maintain a website repository of technical and procedural as well as general questions and answers the regions and states have dealt with regarding biosolids to improve EPA knowledge transfer to regional and state biosolids program managers as well as wastewater treatment plant operators.	U	Assistant Administrator for Water		

<sup>1</sup> C = Corrective action completed.  
R = Recommendation resolved with corrective action pending.  
U = Recommendation unresolved with resolution efforts in progress.