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October 7, 2026

Ms. Nicole Murley
Deputy Inspector General
U.S. Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, NW (2410T)
Washington, D.C. 20460

Dear Ms. Murley:

Re: Evaluation of Trends in Resource Conservation and Recovery Act State-Level Enforcement Data (Report No. 26-E-0025)

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) Hazardous Waste Subcommittee is aware of the recent report published by the Office of Inspector General (OIG) titled, "Evaluation of Trends in Resource Conservation and Recovery Act State-Level Enforcement Data." ASTSWMO is an association representing the waste management and remediation programs of the fifty States, five Territories and the District of Columbia (States). ASTSWMO's members oversee the implementation of the Resource Conservation and Recovery Act (RCRA).

ASTSWMO's Hazardous Waste Subcommittee has reviewed the OIG report, and members have expressed concern regarding the dataset used by the OIG in evaluating State-level enforcement data. Specifically, members have identified that their complete set of compliance and enforcement data did not appear to be utilized, and that inspection rates were not as they expected. Members are aware that the OIG removed certain data in its selection methodology before conducting its analysis.

Several States have attempted to recreate the dataset used by the OIG using the selection methodology described in the report but have been unable to do so using their own State data in RCRAInfo. Therefore, I am writing on behalf of State hazardous waste programs to request: (1) the full dataset used by the OIG **before** the data selection methodology was applied and (2) the full dataset used by the OIG **after** the selection methodology was applied. This will allow States to better understand how the OIG reached its conclusions and to determine if action is necessary to improve compliance and enforcement activities.

Thank you for your consideration of the Hazardous Waste Subcommittee's request. If you have any questions, please contact me at melissa.ferree@delaware.gov or 302-739-9403.

Sincerely,

Melissa Ferree (DE), Chair
ASTSWMO Hazardous Waste Subcommittee

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