



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL

*Catalyst for Improving the Environment*

## Evaluation Report

# Region 4 Should Strengthen Oversight of Georgia's Concentrated Animal Feeding Operation Program

Report No. 11-P-0274

June 23, 2011



## Report Contributors:

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## Abbreviations

CAFO	Concentrated Animal Feeding Operation
CMS	Compliance monitoring strategy
CWA	Clean Water Act
EPA	U.S. Environmental Protection Agency
GDA	Georgia Department of Agriculture
GEPD	Georgia Environmental Protection Division
OIG	Office of Inspector General
MOA	Memorandum of agreement
NMP	Nutrient management plan
NPDES	National Pollutant Discharge Elimination System

**Cover photo:** *From left: Hog confinement; a cattle feedlot. (EPA photos)*

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# At a Glance

*Catalyst for Improving the Environment*

## Why We Did This Review

The Office of Inspector General received a Hotline complaint claiming that U.S. Environmental Protection Agency (EPA) Region 4 was not adequately overseeing Georgia's Concentrated Animal Feeding Operation (CAFO) program. In response, we evaluated EPA's management controls over Georgia's National Pollutant Discharge Elimination System (NPDES) CAFO program.

## Background

The Clean Water Act (CWA) prohibits the discharge of pollutants from any point source to navigable waters of the United States unless authorized under an NPDES permit issued by EPA or an authorized state. The CWA defines CAFOs as point sources. A CAFO is a facility where more than 1,000 animal units are confined and fed for a total of 45 days or more in any 12-month period.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

The full report is at:  
[www.epa.gov/oig/reports/2011/20110623-11-P-0274.pdf](http://www.epa.gov/oig/reports/2011/20110623-11-P-0274.pdf)

## ***Region 4 Should Strengthen Oversight of Georgia's Concentrated Animal Feeding Operation Program***

### **What We Found**

We found significant deficiencies in the Georgia Environmental Protection Division's (GEPD's) management and Region 4's oversight of the CAFO program. Region 4 gave Georgia's CAFO program a positive assessment because GEPD reported that all 48 of the CAFOs with liquid manure waste systems were inspected in 2010. However, our review identified a number of deficiencies for 34 of the 48 CAFOs Georgia inspected. CAFOs were operating without NPDES permits or Nutrient Management Plans, inspection reports were missing required components, and the Georgia Department of Agriculture was not assessing compliance with permit conditions. For its part, Region 4 did not assure that these components of Georgia's CAFO program met the requirements outlined in the 2007 memorandum of agreement between Region 4 and GEPD. As a result, there is a significant risk that the Georgia's CAFO program is failing to protect water quality. These facilities raise concerns about water quality because the animals produce large quantities of waste—many times more waste than humans annually. The discharge of waste into surface water is associated with a range of human health and ecological impacts, and contributes to degradation of the nation's surface waters.

### **What We Recommend**

We recommend that the Regional Administrator, EPA Region 4, implement controls as stated in the 2007 memorandum of agreement between EPA Region 4 and GEPD to require enforcement data tracking between GEPD and Region 4, assure CAFO inspections are accurate and complete, and assure that GEPD takes timely and appropriate enforcement actions.

The region agreed with our recommendation. We agree that its actions meet the intent of the recommendation.



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

THE INSPECTOR GENERAL

June 23, 2011

**MEMORANDUM**

**SUBJECT:** Region 4 Should Strengthen Oversight of Georgia's  
Concentrated Animal Feeding Operation Program  
Report No. 11-P-0274

**FROM:** Arthur A. Elkins, Jr.  
Inspector General

A handwritten signature in black ink, appearing to read "Wade Najjum for".

**TO:** Gwendolyn Keyes Fleming  
Regional Administrator, Region 4

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The estimated direct labor and travel costs for this report are \$266,614.

**Action Required**

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. You should include a corrective actions plan for agreed-upon actions, including milestone dates. Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal. We have no objections to the further release of this report to the public. We will post this report to our website at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Wade Najjum at (202) 566-0832 or [najjum.wade@epa.gov](mailto:najjum.wade@epa.gov), or Dan Engelberg at (202) 566-0830 or [engelberg.dan@epa.gov](mailto:engelberg.dan@epa.gov).

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## Purpose

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), received a Hotline complaint alleging that EPA Region 4 was not adequately overseeing Georgia's Concentrated Animal Feeding Operation (CAFO) program. In response, the OIG evaluated EPA's management controls over Georgia's National Pollutant Discharge Elimination System (NPDES) CAFO program.

## Background

### ***NPDES CAFO Permits and Inspection Process***

The Clean Water Act (CWA) prohibits the discharge of pollutants from any point source to a water of the United States unless authorized under an NPDES permit issued by EPA or an authorized state. The CWA defines a CAFO as a point source. A CAFO is a facility where animals<sup>1</sup> are confined and fed for a total of 45 days or more in any 12-month period. An NPDES permit controls water pollution by establishing limits on the types and amounts of pollution that can be discharged into waterways. Unlike industrial point source facilities that are permitted to discharge some waste to surface waters, CAFOs must not discharge waste to surface waters, except in extraordinary circumstances. If a CAFO discharges and has no permit, it is violating the CWA. According to 40 CFR §122.23, NPDES permits are valid for a period of 5 years. To renew an NPDES permit, a permittee may submit a renewal application no later than 6 months prior to the expiration of their current permit.

As well as requiring CAFOs with a potential to discharge to obtain NPDES permits, federal regulations require that CAFOs manage nutrients through a nutrient management plan (NMP). An NMP is intended to manage nutrients generated by animal manure and associated wastes. The NMP identifies, among other things, appropriate site-specific conservation practices to be implemented including, (1) protocols for land-applying manure, litter, and process wastewater; (2) protocols for testing manure, process wastewater, and soils; (3) procedures for spreading manure on cropland at site-specific rates to assure agricultural utilization of nutrients; and (4) records showing how the operator is implementing the NMP.

CAFO operators may be asked to provide NMPs, which are reviewed by inspectors to determine compliance with the NPDES permit. In addition, a CAFO is obliged to file an annual report with the state director. This report must include the amount of animal waste generated for the year, the number of acres covered

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<sup>1</sup>CAFOs are designated medium or large based on the type and threshold number of animals. For example, a large CAFO could have at least 700 mature dairy cows or 2,500 swine (each over 55 pounds), while a medium CAFO could have 200 to 699 mature dairy cows or 750 to 2,499 swine (each over 55 pounds).

by the NMP, where the manure was spread, and a summary of any discharges. Improper handling or management of nutrients may result in a runoff, which could pollute surface waters. In 2007, EPA issued a Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy for the Core Program and Wet Weather Sources (CMS) recommending that states inspect NPDES-permitted CAFOs at least once every 5 years to determine compliance with permit requirements. According to this strategy, EPA's Office of Enforcement and Compliance Assurance (OECA) will evaluate whether the CMS is achieving the desired results.

### ***Georgia and EPA Region 4 Responsibilities for Implementing NPDES CAFO Program***

The CWA allows EPA to authorize states to operate an NPDES program if the state demonstrates the authority and capability to run the program, and if its environmental enforcement authorities are at least as stringent as those set out in federal law. 40 CFR 123.24 establishes the memorandum of agreement (MOA) as an instrument for ensuring that EPA and states adhere to the CWA. In 2007, Region 4 updated its MOA with the Georgia Department of Natural Resources, Environmental Protection Division (GEPD). The MOA establishes policies, responsibilities, and procedures for EPA and GEPD with respect to program management, permitting, monitoring, inspections, and enforcement. According to the MOA, Region 4 will oversee GEPD's administration of the NPDES program on a continuing basis for consistency with the CWA and applicable federal and state laws and regulations. According to GEPD, Region 4 annually grants \$4 million to GEPD to operate its NPDES program.

Under the MOA, GEPD is responsible for issuing NPDES permits and conducting enforcement actions for CAFOs. It issues general permits to non-swine CAFOs (dairy and poultry) and individual permits to swine CAFOs. A general permit has one set of requirements for a group of facilities, while an individual permit has specific requirements for an individual facility. GEPD reported that as of June 2010, it issued 152 NPDES CAFO permits with another 658 NPDES CAFO permit applications still pending. Forty-eight of these permitted CAFOs have liquid manure systems (manure stored in lagoons or tanks in a liquid slurry state), which have a potential to discharge into surface waters. These 48 CAFOs are inspected annually. The MOA requires GEPD to "comprehensively assess compliance with permit conditions," and to take "timely and appropriate enforcement actions." GEPD told us that they use about \$270,000 of the \$4 million annual grant from EPA to operate their CAFO permit and enforcement program.

GEPD contracts with the Georgia Department of Agriculture (GDA) to carry out most of its NPDES CAFO oversight responsibilities. GDA reviews permit applications, approves NMPs, and conducts CAFO inspections. However, GDA has no enforcement authority; this authority remains with GEPD.

## Scope and Methodology

The OIG evaluated EPA's management controls over Georgia's NPDES CAFO program in response to a Hotline complaint in the form of an anonymous letter on October 1, 2010, which claimed that EPA Region 4 was not adequately overseeing Georgia's CAFO program.

To determine whether EPA provides adequate oversight of the NPDES CAFO program in Georgia, we conducted interviews with staff and managers from EPA Region 4's Water Protection Division, GEPD, and GDA. We also reviewed the 2010 NPDES inspection reports for all 48 CAFOs with liquid waste systems in Georgia. We sought to determine whether inspectors gathered and reviewed inspection components necessary to determine if CAFOs were overapplying manure. These components include records of land application rates and evidence to verify that inspectors compared land application rates with the CAFO's NMP. When records were available, we compared land application rates with the NMP to determine whether CAFOs may have overapplied manure.

We conducted our review from November 2010 to April 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform our review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

## Results of Review

We found significant deficiencies in GEPD's management and Region 4's oversight of the CAFO program. Region 4 gave Georgia's CAFO program a positive assessment because GEPD reported that all 48 of the CAFOs with liquid manure waste systems were inspected in 2010. However, our review identified a number of deficiencies for 34 of the 48 CAFOs Georgia inspected. CAFOs were operating without NPDES permits or NMPs, inspection reports were missing required components, and GDA was not assessing compliance with permit conditions. For its part, Region 4 did not assure that these components of Georgia's CAFO program met the requirements outlined in the 2007 MOA between Region 4 and GEPD. As a result, there is a significant risk that Georgia's CAFO program is failing to protect water quality. These facilities raise concerns about water quality because animals produce large quantities of waste—many times more waste than humans annually. The discharge of waste into surface water is associated with a range of human health and ecological impacts, and contributes to degradation of the nation's surface waters.



## ***CAFOs Operating Without Permits and Nutrient Management Plans***

Our review of GDA's CAFO files found nine CAFOs operating in violation of the CWA. Of these nine CAFOs, six were operating without an NPDES permit, and five did not have approved NMPs. Two CAFOs had neither a permit nor an NMP. Federal regulations require a CAFO that discharges or proposes to discharge to obtain an NPDES permit and to manage its animal waste through an approved NMP. GEPD's Industrial Compliance Unit Manager said he was unaware of these deficiencies.

We identified six CAFOs operating without an NPDES permit. The MOA requires GEPD to process in a timely manner and propose to issue, reissue, modify, terminate, or deny NPDES permits. While GEPD contracts with GDA to review NPDES permit applications and NMPs, it did not manage the contract to verify that CAFOs had the proper permits. Four of these six CAFOs were operating with general permits that expired in 2007. These four should have applied for a permit extension but the GDA supervisor stated that these CAFOs have not applied for an extension. GEPD's Industrial Compliance Unit Manager told us that he was unaware that CAFOs had not applied for permit extensions.

The other two CAFOs without permits were swine operations that wanted to expand to more than 2,500 swine. NPDES regulations require CAFOs with more than 2,500 swine each weighing 55 pounds or more to obtain an individual NPDES permit. According to the GDA supervisor, the CAFOs applied for NPDES permits in 2004 and 2007, but GEPD did not issue the permits. GEPD's Industrial Compliance Unit Manager informed us that at the time, permit applications for new or expanding swine operations were tabled until final rules were adopted. He told the two CAFO operators to remain under 2,500 swine but issued no formal notices to do so. However, our review of GDA's inspection reports found evidence these CAFOs have more than 2,500 swine. GEPD's Industrial Compliance Unit Manager told us he was unaware of this.

We also identified that five of the nine CAFOs were operating without an approved NMP. Georgia's NPDES permits for CAFOs require an approved NMP. While GEPD contracts with GDA to review and approve NMPs, it did not manage the contract to verify that all CAFOs have NMPs. Four of these five CAFOs submitted NMPs to GDA for approval, but GDA rejected them because they did not satisfy the NMP guidelines, according to the GDA supervisor. The remaining CAFO never submitted an NMP to GDA, according to the GDA supervisor. GEPD's Industrial Compliance Unit Manager told us that he was not aware that these CAFOs were operating without approved NMPs. Based on our review, GEPD and GDA began modifying a number of procedures and are evaluating why CAFOs are operating without approved NMPs.

## ***Inspection Reports Missing Required Components***

Our analysis of the CAFO inspection reports prepared by GDA found that some components required for the inspection were missing. The NPDES permit requires that items such as land application data, soil samples, and wastewater analysis be completed and made available during an inspection. While GDA conducts the inspections for GEPD, it has no enforcement authority to compel CAFOs to submit required components for those inspections. According to the GDA supervisor, GDA inspectors can only request that CAFO operators send the missing records or documents to GDA or GEPD. We found no documentation in the inspection reports to demonstrate that GEPD took any actions to collect this information. Of the 48 inspections we reviewed, 23 were missing at least one required component, including 12 CAFOs missing at least one of the 8 key components we deemed necessary for determining compliance with the NPDES permit (table 1). The remaining 25 inspection reports contained necessary components to determine if CAFOs were overapplying manure.

**Table 1: CAFO inspections missing required components**

<b>Components required by permit or NMP</b>	<b>Number of inspections missing required components</b>
Land application records	7
Wastewater analysis to determine nutrient levels	6
Soil analysis to determine ambient nutrient levels	1
Calibration tests for application equipment	8
Monitoring well tests to ensure that storage lagoons are not impaired	2
Monitoring wells locations on NMP	8
Operator certification	3
Annual report on facility operations	1

Source: OIG analysis of GDA inspection reports.

We identified 23 inspection reports that were missing components required for a complete NPDES permit inspection. For example, seven of the inspection reports did not contain land application documentation. This documentation includes the rate of land application, crops, location, and methods used for the application. In addition, six inspection reports did not have a wastewater analysis and one inspection report did not have a soil analysis. In our opinion, the land application records, wastewater analysis, and soil analysis are critical to assessing compliance with the NPDES permit. At least one of these components was missing in 12 of the inspection reports we reviewed.

GEPD contracts with GDA to conduct these inspections and obtain the components required for a complete NPDES inspection and compliance analysis. In our opinion, these state agencies must communicate to ensure that Georgia CAFOs meet NPDES permit requirements. Based on our review, GEPD and GDA

have begun modifying a number of procedures. For example, according to the GEPD unit manager, GDA is developing a new method of transmitting and communicating inspection reports to GEPD district offices. This new method includes a transmittal form that highlights the significant issues documented during the inspection and whether GEPD followup is recommended.

**GDA Not Assessing Compliance With Permit Conditions**

A critical aspect of CAFO inspections is comparing actual against allowable manure application rates. Overapplying manure can lead to excess manure runoff in neighboring streams. However, according to the GDA supervisor, GDA did not determine compliance with permit conditions by comparing manure application rates to the NMPs. Of the 48 inspection reports we reviewed, 22 contained both land application records and current NMPs. We analyzed the records for these 22 CAFOs and identified six that may have overapplied nutrients (table 2). The contract between GEPD and GDA states that GDA will assure compliance with applicable water quality rules, regulations, and permits, but GEPD’s Industrial Compliance Unit Manager told us he did not know that GDA was not making this comparison.

**Table 2: Comparison of land application rates to NMPs**

CAFO	Type	Acres	Actual land application rate for 2010 lbs/acre	NMP allowance lbs/acre	Overage lbs/acre
1	Poultry	6.6	567	415	152
		17.4	536	415	121
		9.7	614	415	199
		13.1	772	415	357
2	Dairy	85	714	470	244
3	Dairy	34	556	100	456
4	Dairy	9.3	457	393	64
5	Dairy	130	15,326	200	15,126
6	Dairy	32	836	303	533

Source: OIG analysis of GDA inspection reports.

Based on our analysis of the inspection reports with an NMP and land application records, 16 CAFOs appear to be complying with manure application rates in their NMPs. The remaining six CAFOs reported applying manure in excess of the recommended amounts in their NMPs. The reported overapplication ranged from 64 pounds per acre to what appears to be an error with 15,126 pounds per acre.

Region 4’s MOA requires GEPD to “comprehensively assess compliance with permit conditions.” GEPD contracts this function to GDA. The contract specifies that GDA will conduct inspections of swine and non-swine feeding operations

with NPDES permits to assure compliance with the Federal Water Pollution Control Act (Clean Water Act) and the Georgia Rules and Regulations for Water Quality Control. The current GDA inspection supervisor told us that the previous GDA supervisor had never required inspectors to conduct this comparison. The contract with GDA also states that GEPD will review and evaluate GDA's program at least every 12 months to ensure the program is satisfying relevant state and federal water quality requirements. In our opinion, GEPD was not adequately overseeing the GDA's CAFO inspection program because this deficiency should have been identified and corrected.

#### ***Region 4 Unaware of Deficiencies in Georgia CAFO Program***

While Region 4 accepted and reported to EPA headquarters that GEPD had exceeded its CMS goal of inspecting CAFOs at least once every 5 years, the Region 4 Acting Water Protection Division Director and his staff told us that they were unaware of the critical deficiencies we identified. Under the MOA, Region 4 is responsible for verifying that GEPD administers the NPDES program for consistency with the CWA. Our review found deficiencies in 34 of the 48 CAFO inspection reports completed in 2010. We discussed these problems with Region 4's Acting Water Protection Division Director and his staff. They were unaware of any of the problems we found in our review.

In addition, the MOA requires GEPD to take timely and appropriate enforcement actions for violations. While GEPD reported taking some action for the CAFOs in 2010, it did not report the results to Region 4. Since the region has not obtained enforcement data from GEPD, it cannot determine whether GEPD takes timely and appropriate enforcement actions.

Finally, in 2006 and 2007, Region 4 conducted CAFO inspections in Georgia and found two CAFOs with deficiencies similar to those we identified. However, the region apparently did not use the information from its experience to change its oversight activities to gain assurance that the CAFO program was functioning as intended.

## **Conclusion**

Significant weaknesses in the management of Georgia's CAFO program threaten water quality protections in that state. GEPD was not managing its contract with GDA and, as a result, CAFO inspections were not complete. Region 4 had not implemented management controls to assure GEPD's permit inspection and enforcement programs addressed compliance problems with Georgia's CAFOs. Based upon our analysis of Georgia's inspection records, OECA's 2007 CMS inspection goals present a misleading picture of the status of the state's program. Georgia and Region 4 reported a 100 percent inspection rate for CAFOs with liquid waste management systems, but almost half of these inspection reports were missing information. As a result of inadequate oversight and reporting,

Georgia's waters are vulnerable to discharges of animal waste from CAFOs, which are associated with a range of human health and ecological impacts, and contribute to degradation of the nation's surface waters.

## **Recommendation**

We recommend that the Regional Administrator, EPA Region 4:

1. Implement controls between EPA Region 4 and GEPD to:
  - a. Require enforcement data tracking between GEPD and Region 4.
  - b. Assure CAFO inspections are accurate and complete.
  - c. Assure that GEPD takes timely and appropriate enforcement actions.

## **Agency Response and OIG Comment**

The region agreed with our recommendation. We agree that the region's actions meet the intent of the recommendation. We provided Region 4 information regarding the CAFO cases we reviewed. The Agency's full response is in Appendix A.

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

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	8	Implement controls between EPA Region 4 and GEPD to: <ul style="list-style-type: none"> <li>a. Require enforcement data tracking between GEPD and Region 4.</li> <li>b. Assure CAFO inspections are accurate and complete.</li> <li>c. Assure that GEPD takes timely and appropriate enforcement actions.</li> </ul>	O	Regional Administrator, Region 4			

<sup>1</sup> O = recommendation is open with agreed-to corrective actions pending  
 C = recommendation is closed with all agreed-to actions completed  
 U = recommendation is undecided with resolution efforts in progress

## Agency Response

May 27, 2011

### MEMORANDUM

**SUBJECT:** Draft Report: Region 4 Should Strengthen Oversight of Georgia's Concentrated Animal Feeding Operation Program; Office of Inspector General Project No. OPE-FY11-0004

**FROM:** Gwendolyn Keyes Fleming  
Regional Administrator

**TO:** Dan Engelberg  
Director of Program Evaluation  
Water and Enforcement Issues  
Office of Inspector General

This is in response to your memorandum to me dated May 6, 2011, regarding an Office of Inspector General draft report containing the results of your review of Region 4's oversight of Georgia's National Pollutant Discharge Elimination System (NPDES) Concentrated Animal Feeding Operation (CAFO) program. The ever-evolving CAFO-related case law significantly impacts the permitting requirements governing CAFOs and smaller animal feeding operations (AFOs). If available, Region 4 would like any specifics collected on the 48 CAFO inspections. Nevertheless, the Region generally concurs with the recommendations made in your report.

Below are the recommendations from the draft report with our responses:

1. **OIG Recommendation:** Require enforcement data tracking between Georgia Environmental Protection Division (GAEPD) and Region 4.

EPA Response: We concur. When reporting for the 106 Workplan before FY 2011, Georgia has sent summary statistics to the EPA regarding the number of inspections they conducted each fiscal year. For the FY 2011 106 Workplan, we have required GAEPD to "submit hard or electronic copies of all CAFO/AFO formal actions." For NPDES-permitted CAFOs, the EPA requires GAEPD to enter facility information, inspections, and enforcement actions related to the facility into the EPA's Integrated Compliance Information System (ICIS). Most CAFOs, however, are not NPDES permitted and not tracked in ICIS because the 2008 Rule does not require CAFOs to obtain permits if they claim no discharge.

2. OIG Recommendation: Assure CAFO inspections are accurate and complete.

EPA Response: We concur. During the remainder of FY2011, the EPA Region 4 will conduct two or three joint CAFO inspections with the Georgia Department of Agriculture and GAEPD to share information and to verify that their inspections are accurate and complete. We will also conduct routine reviews of CAFO inspection reports and files as part of our normal oversight of the state.

3. OIG recommendation: Assure that GAEPD takes timely and appropriate enforcement actions.

EPA Response: We concur. In our routine annual oversight of Georgia's CAFO enforcement program, we have not found evidence of a significant concern related to timely and appropriate enforcement actions. Region 4 will review GAEPD's formal CAFO/AFO enforcement actions, which they are required to submit according to the FY 2011 106 Workplan, to ensure that the inspections are accurate and complete, and that the actions are timely and appropriate.

Thank you for the opportunity to comment on this draft report. Please contact Mr. Jim Giattina, Director of the Water Protection Division, at [Giattina.Jim@epa.gov](mailto:Giattina.Jim@epa.gov) or at (404) 562-9345, if you have any questions about our response.



## ***Distribution***

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