

# Inspector General Finds Waste Management Still Using Informal Waste Agreements Amid Missing St. Croix Inspection Records and Unverified Landfill Claims

**WMA implemented seven of 12 audit reforms, but the Inspector General found it still relied on month-to-month verbal agreements, lacked St. Croix inspection records and could not show that landfill contractor claims were reviewed for reasonableness.**

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The V.I. Waste Management Authority continued providing solid-waste collection through month-to-month verbal or informal arrangements after at least 10 contracts expired, while lacking evidence that landfill work claims were properly reviewed or that St. Croix bin-site inspections were documented, according to a [new report](#) from the V.I. Inspector General.

The July 28 follow-up review found that Waste Management had implemented seven of 12 recommendations issued in a February 2022 contract-administration audit. Two recommendations were partially implemented, while three had not been implemented.

The remaining deficiencies involved competitive procurement, written monitoring procedures, inspection records, equipment for landfill monitors and verification that contractors were being paid only for work properly documented and performed.

Inspector General Delia M. Thomas said WMA's July 16 response adequately addressed the five unresolved recommendations. However, the report calls for future reviews to verify whether the authority completes the corrective actions and deadlines outlined in its response.

### **At Least 10 Contracts Had Expired**

The most significant unresolved procurement finding involved Waste Management's failure to competitively solicit and award new solid-waste collection contracts.

At least 10 contracts had expired by 2022. At the time of the follow-up review, the authority had no active contracts for solid-waste collection services and continued using several trucking companies through "verbal/informal agreements" on a month-to-month basis.

The Inspector General attributed the situation to WMA's planned transition to a hybrid system in which some collection services would be performed by authority employees and others would remain outsourced.

That model had not been fully implemented when the review was conducted.

Waste Management said it intends to convert bin sites into convenience centers staffed by authority employees and assume additional responsibility for residential waste collection.

The Inspector General said a future follow-up would be required to determine whether the authority implemented that hybrid model and completed competitive procurements for outsourced work.

### **Auditors Could Not Verify Landfill Work Chains**

The review also found that WMA did not provide evidence showing that claims submitted by its landfill contractor had been adequately reviewed for reasonableness.

The original recommendation required the authority to verify contractors' work before payment so that public funds would be used only for services rendered.

Auditors said employees responsible for monitoring the contractor lacked necessary vehicles, while contractors did not always submit invoices promptly. Those conditions prevented timely verification of the work performed and its associated cost.

The Inspector General concluded that the authority's delay in implementing the unresolved recommendations left it "unable to ensure that operations are conducted at the lowest cost and with the greatest benefit."

The authority was also "unable to ensure that services are properly performed for the cost paid."

### **Monitoring Vehicles Not Provided at St. Thomas Landfill**

Although WMA reported purchasing vehicles, the Inspector General found that employees at the St. Thomas landfill had not received the transportation needed to monitor the contractor's work.

The vehicles were considered essential because employees must travel throughout the landfill to inspect operations and confirm that contracted services are being performed.

Waste Management officials said landfill operations were intended to be monitored regularly. The report said another review would be necessary to confirm whether the required vehicles were eventually assigned.

WMA attributed its continuing difficulty acquiring monitoring vehicles and equipment to funding limitations.

In its response, the authority said it was evaluating its equipment and vehicle needs and pursuing sustainable funding sources, including proposed solid-waste collection fees presented to the Public Services Commission.

WMA said revenue from those fees would support operational improvements, equipment purchases and regulatory compliance.

The authority assigned Chief of Solid Waste Shena Esannason, Equipment Manager Deon Malone and Chief Administrative Officer Sandra David to oversee that work. Its completion timeline remains open and is dependent on available funding and procurement schedules.

### **St. Croix Inspections Records Were Missing**

The Inspector General partially credited Waste Management for improving its documentation of bin-site inspections on St. Thomas and St. John.

St. Thomas personnel began using a Daily Activity Report for inspections, while employees on St. John used Daily Bin Site Log Sheets to record conditions at each location.

On St. Croix, however, WMA did not provide documentation supporting periodic bin-site inspections. St. Croix employees told auditors that they responded when complaints were received.

The report also found that landfill employees did not document the results of their inspections of contractors' work.

WMA said it plans to implement a standardized inspection and documentation process on St. Croix modeled after the systems used on St. Thomas and St. John.

The authority said the new process would record inspections, contractor performance, service deficiencies, corrective actions and customer complaints consistently throughout the territory.

Implementation is targeted for September 2026. Waste Management said the recent appointment of a dedicated St. Croix collections manager had strengthened its oversight capacity.

Ms. Esannason and St. Croix Collections Manager Latoya Willis were identified as the officials responsible for the initiative.

### **Written Monitoring Procedures Not Produced**

The Inspector General also partially implemented a recommendation requiring WMA to establish written procedures for monitoring contracted services.

The authority officials said procedures had been developed for monitoring landfill operations and solid-waste collection at bin sites, but the authority did not provide copies to auditors.

In its response, WMA said it used Environmental Protection Agency grant funding to retain Oasis Environmental to help develop comprehensive standard operating procedures for the Anguilla and Bovoni landfills.

The procedures are intended to standardize monitoring, inspections, documentation, regulatory compliance and operations at both facilities.

Waste Management said the Anguilla Landfill procedures had been completed. Development of the Bovoni Landfill procedures remained underway and was expected to be finalized after the consultant completed its work.

Ms. Esannason and Grant Manager Juanita Iles were assigned responsibility for the procedures.

### **Competitive Contracts Targeted for December**

The authority said it had begun several procurement actions intended to replace its interim arrangements with competitively awarded contracts.

For St. Thomas bin-site management and collection, the authority issued Request for Proposals No. 003-T-2026. Proposals are due August 21, 2026, with contract execution anticipated in December.

Procurement Director Michael Vante, Ms. Esannason and St. Thomas Collections Manager Petula Stevens were identified as the responsible officials.

On St. Croix, WMA has assumed direct responsibility for collection at the Cotton Valley and Peter's Rest bin sites using authority employees.

It also issued Request for Proposals No. 004-C-2026 for St. Croix bin-site management and collection. Responses are due August 21, with contract execution also anticipated by December.

Mr. Vante, Ms. Esannason and Ms. Willis were assigned to oversee that procurement.

### **Landfill Contracts Expected in 2027**

For management of the Anguilla and Bovoni landfills, WMA said it had completed a draft scope of work that would undergo an independent engineering review before advertisement.

The authority expects to issue the request for proposals in October 2026.

After a two-month solicitation period and approval by the Waste Management Board of Directors, a contract award is anticipated by February 2027.

Mr. Vante, Ms. Esannason and Chief of Engineering Alex Bruney were assigned responsibility for the landfill procurement.

The same procurement is expected to address the Inspector General's concerns about reviewing landfill invoices and work claims.

WMA said the scope would include detailed requirements for performance, measurement, supporting documentation, invoicing, reimbursable services and invoice review.

The provisions are intended to ensure that payments are made only for properly documented and authorized services.

### **More Than Half of St. Croix Residential Collection Brought In-House**

Waste Management said it had transferred more than half of St. Croix's residential garbage collection to authority employees.

WMA personnel currently serve approximately 7,385 of the island's 13,485 households. Two private contractors serve approximately 6,100 households.

The authority plans to advertise a new solicitation for the remaining residential routes in October 2026, with a contract award expected by February 2027.

Mr. Vante, Ms. Esannason and Ms. Willis will oversee the process.

On St. Thomas, private contractors provide residential collection to approximately 2,995 households.

WMA said it was acquiring additional collection vehicles and evaluating whether selected routes could be transferred to in-house operations while residential coverage is expanded.

The St. Thomas solicitation was issued in July, with proposals due August 14, 2026.

Mr. Vante, Ms. Esannason, Ms. Stevens and Mr. Malone were identified as the responsible officials.

### **Seven Recommendations Fully Implemented**

The Inspector General credited VIWMA with completing several changes involving records, contract billing, budgeting and payments.

The Procurement Division established an electronic filing system for contract documents beginning in FY2019.

Each electronic file now contains a checklist that is reviewed periodically to ensure required records are included. The filing system complies with the authority's seven-year retention requirement.

VIWMA also hired a contract and inventory manager to implement its procurement policy, which was updated on November 4, 2022.

The authority established a review process under which division directors examine contractors' invoices with the Procurement Division before the bills are submitted for payment.

VIWMA officials also reported upgrading information-technology systems at landfills throughout the territory to create an additional record of transactions involving contractors.

The authority provided a sole-source request documenting changes in rates for solid-waste removal services and implemented tipping fees based on the volume of waste rather than its weight.

Tipping fees are charges imposed by disposal facilities when haulers or other customers deposit waste.

### **In-House Work Produces**

The Inspector General found that VIWMA had developed a budget more closely aligned with anticipated revenue and expenses.

The Solid Waste Division's decision to take over contract services at several bin sites resulted in estimated annual savings of \$500,000, according to the report.

VIWMA also incorporated its outstanding and current contractual obligations into its annual budget and reported projected contract expenses against anticipated allotments.

The authority continued paying obligations incurred for contracted services after the 2017 hurricanes and took steps to make contractors whole.

The report nevertheless noted that although VIWMA had substantially reduced unpaid balances owed to service providers, new obligations continued to accumulate.

The Inspector General also credited the authority with keeping the Legislature informed about its outstanding obligations.

In FY2022, VIWMA submitted a supplemental budget request to the Office of Management and Budget that increased its allotment by \$5 million to support timely contractor payments.

The original audit was issued on February 8, 2022, and primarily covered fiscal years 2017 through 2019. Its scope was later expanded to include contract-monitoring practices during FY2020.

The follow-up examined contracts awarded, modified or closed from FY2017 through FY2025.

Auditors interviewed officials and reviewed contract files, monitoring reports, documentation supporting service-provider bills and payment records.

The review examined whether contracts were properly awarded or renewed, contractors complied with applicable terms and regulations, billed services were properly documented and reviewed, and contractors were paid correctly and on time.

The Inspector General conducted the review under generally accepted government auditing standards.

The report was distributed to Waste Management, the offices of the governor and lieutenant governor, OMB, the V.I. Department of Justice, the 36th Legislature, the Office of the Legislative Post Auditor and the Virgin Islands delegate to Congress.

Federal recipients included the U.S. Attorney's Office and the Federal Bureau of Investigation.