

**FY 2018-2019 COMMENTS AND RESPONSE TO COMMENTS
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

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<p>National Pesticide Program - Federal Insecticide, Fungicide and Rodenticide Act [FIFRA]</p>	<p>In 2007 the CSKT Pesticide Program was established with USEPA cooperative agreement effort to implement FIFRA in Indian Country. The CSKT serves as a circuit rider program conducting FIFRA inspections, investigations and offers compliance on four reservations in Montana on behalf of EPA.</p> <p>1. Strengthening State and Tribal Partnerships through continued effective management of pesticide cooperative agreements If funding is reduced the impacts on would impact four Indian Reservations with a total of 5 million acres. Reduced funding or program elimination would increase noncompliance and contamination of resources and human health.</p> <p>2. Assisting in national, regional and local Pollinator Protection Efforts. Since 2013, the program has made several partnerships for efforts to reverse pollinator declines in Indian Country nationwide; one of the partnerships is tasked with assisting tribes with developing Native Bee Pollinator Protection Plans.</p> <p>Funding reductions would result in impacts</p>	<p>Randy Ashley Environmental Protection Division, Natural Resource Department, Confederated Salish and Kootenai Tribes (CSKT)</p>	<p>The EPA agrees that strengthening state and tribal partnerships through continued effective management of pesticide cooperative agreements should remain a priority, and that pollinator protection efforts should remain a national priority for the FY18-19 NPM guidance cycle.</p>

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	to the tribe's and nation's food supply, plants (cultural, medicinal, pharmaceutical), plant materials and ecosystem health required for recreation and wildlife.		
National Pesticide Program - Federal Insecticide, Fungicide and Rodenticide Act [FIFRA]	States hope that OCSPP will continue to encourage and highlight modernization efforts of pesticide-related projects such as the Pesticides Data Accessibility and Label Matching project, and will devote appropriate resources to support and advance this work.	ECOS	While the EPA supports these modernization efforts, they are not specific components of the Office of Pesticides Program portion of the OCSPP NPM guidance.
Tribal Consultation	Every NPM should have a section explicitly committing each EPA program toward its consultation and trust obligations to Tribes and a commitment to utilize Traditional Ecological Knowledge (TEK) in its decision making	Region 10 Tribal Operations Committee, Tribal Caucus	OCSPP agrees that the consultation process should be used to get meaningful tribal input into our decision making process and we have had several successful consultations for chemical related issues. Also, OCSPP uses the early engagement process and our ongoing conversations with the Tribal Pesticide Program Council (TPPC) and the National Toxics Tribal Council (NTTC) to ensure that we have regular dialogue with tribes about the national pesticide and toxics priorities in the NPM guidance.
Tribal Consultation and Other Concerns	As stated in EPA's Overview of the FY 2018-2019 NPM Guidances, due to the proposed FY 2018 President's Budget, the Guidances will focus on key programmatic activities Agency-wide to provide a national operational framework. We are concerned that the proposed overall cuts to EPA within the President's proposed budget would have	United South and Eastern Tribes Sovereignty Protection Fund (USET SPF) USET SPF member Tribal Nations include: Alabama-Coushatta Tribe of Texas (TX), Aroostook Band of	OCSPP understands the importance of federal funding for tribal programs. The Agency appreciates your comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on

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	<p>an immeasurable and long-lasting impact on programs in Indian Country. These programs are vital to Tribal Nations who utilize them to protect the health and safety of their environment and homelands.</p> <p>The proposed cuts would eliminate 46 programs within EPA totaling \$983 million and reduces funding to states and Tribal Nations in the State and Tribal Assistance Grants (STAG) funding by \$678 million. The proposal to cut funding for vital environmental programs would undo years of progress made by EPA and Tribal Nations, and would threaten the safety and health of the Tribal Nations they serve. Specifically, the proposed budget would eliminate the Tribal 319 Grant program, as stated in the National Water Program Guidance description, which provides grants and technical assistance to support Tribal environmental programs in managing their nonpoint source pollution problems. Funding from this grant has previously been utilized by USET SPF member Tribal Nations, including by the Penobscot Indian Nation to improve and protect water quality in the Penobscot River and Little Mattamiscontis Lake.</p> <p>As stated previously, cuts to Indian programs within the proposed FY 2018 President's budget undermine the federal trust responsibility. In addition to providing sufficient funding, the federal government</p>	<p>Micmac Indians (ME), Catawba Indian Nation (SC), Cayuga Nation (NY), Chitimacha Tribe of Louisiana (LA), Coushatta Tribe of Louisiana (LA), Eastern Band of Cherokee Indians (NC), Houlton Band of Maliseet Indians (ME), Jena Band of Choctaw Indians (LA), Mashantucket Pequot Indian Tribe (CT), Mashpee Wampanoag Tribe (MA), Miccosukee Tribe of Indians of Florida (FL), Mississippi Band of Choctaw Indians (MS), Mohegan Tribe of Indians of Connecticut (CT), Narragansett Indian Tribe (RI), Oneida Indian Nation (NY), Passamaquoddy Tribe at Indian Township (ME), Passamaquoddy Tribe at Pleasant Point (ME), Penobscot Indian Nation (ME), Poarch Band of Creek Indians (AL), Saint Regis Mohawk Tribe (NY), Seminole Tribe of Florida (FL), Seneca Nation of Indians (NY),</p>	<p>the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process.</p>

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	<p>has an obligation to consult with Tribal Nations when taking actions that will affect them and their resources. As an Agency of the federal government, EPA must seek the advice and guidance of Tribal Nations before taking any action impacting Indian Country. We urge EPA to remain steadfast in its fulfillment of the trust responsibility to federally recognized Tribal Nations which includes the duty to ensure the protection of the environment and health of Tribal communities, as well as ensure meaningful consultation with Tribal Nations</p>	<p>Shinnecock Indian Nation (NY), Tunica-Biloxi Tribe of Louisiana (LA), and the Wampanoag Tribe of Gay Head (Aquinnah) (MA).</p>	
<p>Toxic Release Inventory [TRI]</p>	<p>Toxics Use Reduction - Programs for toxics use reduction in manufacturing.</p> <ul style="list-style-type: none"> Item 6 for OCSPP in the NPM Guidance addresses Toxic Release Inventory Data. However, this item does not include goals or programs for reduction of toxics and only addresses TRI data quality checks. The ultimate goal of reduction in toxic releases should also be addressed. We suggest that the OCSPP's Key Programmatic Activity: regarding Toxic Release Inventory (TRI) include addressing reductions in toxic releases. 	<p>Ben McKnight EHS Director Electro-Spec, Inc. and Chair, Indiana Partners for Pollution Prevention - Executive Committee</p>	<p>The Toxics Release inventory (TRI) is a mandatory information disclosure program that requires industrial facilities in many sectors to report their annual TRI-listed toxic chemical releases, recycling, energy recovery, treatment, and source reduction activities to the EPA. Beyond reporting these data to TRI there is no requirement under TRI for facilities to meet certain release reductions or improve their environmental performance. The OCSPP NPM Guidance goal/target for TRI focuses on 600 TRI data quality checks over which the Agency has control. The agency works hard each year to develop data quality targeting lists and reach out to facilities on 600 TRI chemical report submissions. A portion of these data quality checks result in TRI revisions and TRI submissions which improve the quality of the data set, instilling more confidence in the TRI dataset and hopefully, greater use of the TRI</p>

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			<p>data by the many TRI stakeholders (e.g., public, industry, academia, environmental organizations, and all levels of government), which, in turn, promotes better environmental performance on the part of industry.</p> <p>TRI data are used by the EPA in its administration of the Chemical Risk Review and Reduction (CRRR) Program, which implements that Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act. Among other uses, TRI data are a key source of information informing the CRRR Program's prioritization of existing chemicals for required Risk Evaluations and potential subsequent risk management actions.</p>
<p>Chemical Risk Review and Reduction [CRRR]</p>	<p>Given the current administration's focus on implementation of new TSCA as indicated by the support for OCSPP's Chemical Risk and Review program, it is noteworthy that there is not a similar program in the NPM priorities for the regions. The new TSCA preempts state authority so it is more important than ever for the regional offices to have the staff necessary to provide information on unique local exposures and uses of chemicals. We would hope to see the NPM guidance provide support to the regions so that local, regional and tribal input could be fully considered in risk reviews and assessments. Regional input to chemical risk and review programs is very</p>	<p>Dianne Barton, Bad River Band of the Lake Superior Tribe of Chippewa Indians/Columbia River Inter-Tribal Fish Commissions/National Tribal Toxics Council Chair</p>	<p>Following enactment of the FY 2018 Budget by Congress, which may require revisions to the FY 2018/2019 National Program Manager's Guidance, the OCSPP may commence a dialogue with the Regional Offices regarding potential Regional Office roles in EPA's implementation of TSCA as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act.</p>

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	<p>important. Legislators that supported and passed new TSCA never intended that the preemption of state authority would lead to lack of consideration of their constituent's unique local exposures in TSCA's risk and review program. This need is not reflected in the Guidance. We encourage OCSPP to ensure that the regions are able to step and provide local/regional information on any unique uses or exposures to chemicals that are regulated under TSCA.</p>		
<p>Chemical Risk Review and Reduction [CRRR]</p>	<p>States recommend that OCSPP's Key Programmatic Activities include the Strengthening of State and Tribal Partnerships through Effective Management of the Toxic Substances Control Act (TSCA). Through EPA grant funding, ECOS has collaborated with OCSPP's Office of Pollution Prevention and Toxics (OPPT) and states on the new TSCA amendment (Lautenberg Chemical Safety for the 21st Century Act) and general toxics issues. ECOS recommends that OCSPP's work with states on successful implementation of TSCA (i.e. sharing data, disclosure of CBI for administration or enforcement of a law, treatment of an individual, or responding to an environmental release or exposure) continue to be promoted and integrated with other programming where possible. ECOS also requests adequate resources and support for flexibility to facilitate state</p>	<p>ECOS</p>	<p>Following enactment of the FY 2018 Budget by Congress, which may require revisions to the FY 2018/2019 National Program Manager's Guidance, the EPA may commence a dialogue with states and tribes through appropriate organizations and channels regarding potential partnership in EPA's implementation of TSCA as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act.</p>

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	involvement by providing research, studies, training, demonstration, and technical assistance to states as EPA develops new rules and identifies implementation issues related to the reformed TSCA.		
Chemical Risk Review and Reduction [CRRR]	The NPM is silent on any efforts to reform EPA's TSCA rules. Currently, EPA's TSCA rules allow the inadvertent production of PCBs in industrial processes up to 50 parts per millions. In many places, water quality standards for PCBs are measured in the parts per quadrillion to protect human health. This significant disconnect needs to be addressed as many of the products containing higher levels of PCBs release them in to the environment, including through the recycling of paper containing PCB-containing pigments.	Region 10 Tribal Operations Committee, Tribal Caucus	EPA appreciates the concerns regarding PCB contamination. Revising current regulations to address inadvertently generated PCBs presents both policy and scientific challenges. At this time, EPA has no plans to revise its TSCA PCB regulations.
Lead Risk Reduction Program [LRRP]	<ol style="list-style-type: none"> 1. Why has EPA left out the guidance for both the Asbestos and Lead-Based Paint programs? Both programs are currently active on a EPA regional and state program level and priorities for both programs should remain in EPA's NPM guidance until decisions are final, even if they are in draft form. 2. The current Congressional budget proposal to cut the Federal funding to the Lead-Based Paint Program has not been finalized so it seems short-sighted for EPA to totally remove all reference to the Lead-Based Program NPM guidance until the Congressional budget has been 	Jeff Dellinger, NC Public Health	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.

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	<p>finalized.</p> <p>If Congress does cut Federal funding to the Lead-Based Paint program and the total financial responsibility falls to the states, then the states will have to face a reduction in force which will in return reduce the overall effectiveness of the Lead-Based Program which is counter intuitive to why the lead program was created.</p>		
<p>Lead Risk Reduction Program [LRRP]</p>	<p>It is concerning that there is a zero budget for the lead and pollution prevention.</p>	<p>Dianne Barton, Bad River Band of the Lake Superior Tribe of Chippewa Indians/Columbia River Inter-Tribal Fish Commissions/National Tribal Toxics Council</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>
<p>Pollution Prevention Program [P2]</p>	<p>It's been proven over and over that an ounce of pollution prevention is worth a pound of pollution clean-up.</p> <p>Various pollution prevention programs housed at the Colorado Dept of Public Health and Environment have provided incentives (awards, recognition, grants) for companies and nonprofit organizations to avoid pollution. These programs have reduced waste which saves money, avoids air/ water/ soil contamination. The</p>	<p>Janna Six, The Prentice Foundation</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>

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	<p>Environmental Leadership Program, in particular, has acknowledged role models in various industries which are least polluting, which promotes competition and innovative thinking and action, and setting a much higher bar for others.</p> <p>Pollution Prevention is a carrot, rather than a stick – extremely important in a regulatory world.</p>		
<p>Pollution Prevention Program [P2]</p>	<p>The MPCA is greatly disappointed to see that all references to the national Pollution Prevention Act (PPA) were removed from the National Program Manager Guidance for Fiscal Year 2018-2019.</p> <p>Specifically, there is no mention of how the EPA will implement a strategy to promote source reduction, as authorized under Section 6604 of the PPA, nor is there any mention of how the EPA will make matching grants to States for programs to promote the use of source reduction techniques by businesses, as authorized under Section 6605 of the PPA.</p> <p>One of the unique aspects of the PPA is that unlike other environmental regulations, it does not place compliance requirements on manufacturers and service providers. The requirements of the Act are placed specifically on U.S. EPA. and they are intended to assist manufacturers and service</p>	<p>Minnesota Pollution Control Agency</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President’s Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President’s Budget. The EPA’s funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>

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	<p>providers, rather than impose regulatory burdens. As noted in the Findings section of the PPA:</p> <p>“There are significant opportunities for industry to reduce or prevent pollution at the source through cost-effective changes in production, operation, and raw materials use. Such changes offer industry substantial savings in reduced raw material, pollution control, and liability costs as well as help protect the environment and reduce risks to worker health and safety.”</p> <p>Minnesota has had tremendous success in utilizing matching grant funding to achieve the objectives of the PPA and help manufacturers and service providers to become more efficient and more competitive in their respective industry sectors through source reduction techniques.</p> <p>Without continued funding from the EPA, progress will be slowed considerably, particularly in developing new P2 efforts. In consequence, this hurts our ability to protect citizens from pollution that could be avoided.</p> <p>Please see below for examples of recent successes that have taken place in Minnesota.</p> <p>1. The P2 Grant project that Minnesota</p>		

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	<p>conducted from October 2015 through September 2016 assisted facilities employing painting and coating processes in achieving 57,000 pounds in hazardous materials reduction, 60,000 pounds in solid waste reduction, 9,000,000 gallons in water conservation and \$262,000 in annual savings. Additional recommendations offered the potential for another 13,600 pounds in hazardous materials reduction, 10,000 pounds in solid waste reduction, 74,000 kWh in electricity savings and \$424,000 in annual savings.</p> <p>2. The P2 Grant project that Minnesota conducted from October 2013 through September 2016 assisted fiber-reinforced plastics manufacturers in achieving 36,000 pounds in hazardous materials reduction, 4,600 pounds in air emissions reductions and \$461,000 in annual savings.</p> <p>3. The Source Reduction Assistance (SR) project that Minnesota conducted from October 2014 through June 2016 provided technical assistance to 30 automotive repair facilities and industrial maintenance departments to assist sites in choosing safer products that reduced air emissions. Project results include elimination of 4100 lb/yr</p>		

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	<p>of VOC/HAP air pollution and saved businesses over \$7,400. Resources developed during this project for risk assessments, product performance and vendor relationships have been used to replicate the outreach and assistance activities beyond the grant to work with 50 additional small businesses in the EPA Make a Visible Difference area of Duluth, Minnesota. Ten facilities implemented safer alternatives reducing 1700 lb/yr of VOCs and 660 lb/yr of HAPs. These results from the original SR grant are supporting the 2017 SR project addressing hazardous substance reduction in environmental justice communities. Thirteen small businesses in Minneapolis are receiving assistance by a MnTAP Intern and will realize emission reductions of 1160 lb/yr VOCs and 500 lb/yr HAPs.</p> <p>4. MnTAP has a general engineering focus and often uses the federal grants to try new ideas and generate the deeper background data needed to support P2 in target industries. Discontinuing the matching grant program will:</p> <ul style="list-style-type: none"> -Decrease ability to develop background for projects like the degreasing project - federal funds have been used to develop the initial information for the project. This information has been used to support four additional projects and has 		

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	<p>been shared with P2 providers in other states.</p> <p>-Minimize impact of collaborative efforts with other federally funded agencies such as NIST MEPs and state energy offices. Federal support of the P2 grants for the fiberglass and industrial painting industry sectors has enabled coupling of P2 and lean (E3) projects leveraging EPA P2 funding with state P2 funds, MEP resources and state energy funding to strengthen business performance at 14 businesses as well as provide job experience for seven engineering student interns.</p> <p>-Decrease ability to focus deeply on single industry P2 issues and develop the background information needed to make recommendations that strengthen business performance, minimize environmental impact and can be adopted across the entire industrial sector.</p>		
<p>Pollution Prevention Program [P2]</p>	<p>Leprino Foods Company, one of the world's leading dairy processing companies and member of the regulated community, supports continued funding of the EPA's Pollution Prevention Program as it beneficially impacts our business in Colorado via the Colorado Department of Public Health and Environment's (CDPHE) Environmental Leadership Program (ELP). The Pollution Prevention program and ELP uniquely provide businesses voluntary</p>	<p>Leprino Foods Company 1830 W. 38th Avenue Denver, CO 80211 303.480.6500</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to</p>

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	incentives to reduce environmental impacts as well as connect with our communities and peers in meaningful ways. The collaboration catalyzed by the ELP benefits both the environment and Colorado businesses.		revisions in the NPM Guidance.
Pollution Prevention Program [P2]	Colorado's Environmental Leadership Program is funded through the National Prevention Program. I have participated in this program since approximately 2005. This is an excellent program to help businesses stay in compliance with all regulatory programs and offers exceptional guidance for businesses in reducing pollution and keeping the environment clean. The Colorado program provides training and resource help for businesses, especially in the areas of solutions for dealing with difficult wastes. Training is exceptional and always offered in a very cost effective manner. Recognition programs provide incentives for business owners to fund not only mandated initiatives but all those programs that are "the right thing to do." This program promotes cooperation amongst businesses, non-profits and educational institutions that would not otherwise occur. This program is NOT some bureaucratic function making regulations costly for businesses. This program actually makes businesses more profitable by offering assistance and guidance in how to reduce waste and pollution. In cases, businesses are actually able to decrease	Poudre School District	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.

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	<p>regulatory requirements which again has a positive impact on the bottom line. Recognition programs have provided our students with leadership opportunities as well as increasing skill levels in presentations, data analysis and reporting and research. Funding should be increased and not cut.</p>		
<p>Pollution Prevention Program [P2]</p>	<p>As a stakeholder in the Colorado Environmental Leadership Program (ELP), which is partially funded through a federal Pollution Prevention grant, we ask that you reconsider and continue funding this important and effective program.</p> <p>Since 2011 The ELP has provided critical support of our organization and mission to ethically recycle electronics to create local jobs for people with Autism and other disabilities by establishing environmental, health, and safety standards, recognizing our achievement of those standards, which enables us to serve as a role model for other recyclers who often fail to abide by these standards. Noncompliance often directly results in greater cost to the EPA, the Federal agency which ultimately bears some or all of the cost to clean up behind noncompliant offenders.</p> <p>Without oversight and enforcement budgets at the state level, ELP is the primary line of defense to hold members accountable</p>	<p>Blue Star Recyclers 100 Talamine Court Colorado Springs, CO 80907 (719) 597-6119 Attention: Bill Morris, CEO bill@bluestarrecyclers.org</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>

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	through the value they place on membership in the ELP.		
Pollution Prevention Program [P2]	It is a major concern to us as a whole tribe that there are no additional pollution prevention activities taking place in the future. Pollution prevention is a national-wide issues and needs to continue to be a priority.	Joel Green, Hoh Tribe	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.
Pollution Prevention Program [P2]	<p>From the perspective of a professional environmental consultant involved with pollution prevention, exclusion of the EPA's Pollution Prevention Programming is irresponsible.</p> <p>EPA's Pollution Prevention programing is used by the Indiana Department of Environmental Management's (IDEM's) Partner's for Pollution Prevention Program with technical guidance, best management practices, coordination across regions, and grant funding. My environmental consulting company, Mundell & Associates, is a member of the Partner's for Pollution Prevention program and we frequently refer clients and other interested parties to the program. IDEM's Partner's for Pollution Prevention provides a valuable service to business</p>	John Mundell; Mundell & Associates, Inc.	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.

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	<p>across Indiana and sustainability worldwide.</p> <p>Immense benefits to our earth and environment have occurred due to EPA's and each state's pollution prevention program and I, as a business owner and environmental professional, encourage the EPA to reconsider adding programming for EPA's Pollution Prevention program.</p>		
<p>Pollution Prevention Program [P2]</p>	<p>If this funding is cut from the EPA budget it will greatly harm states for these reasons:</p> <ol style="list-style-type: none"> 1) Grantees (such as businesses) will not have the incentive nor finances to move to greener practices. 2) Grantees (such as businesses) will not have the incentive nor finances to develop innovative. recycling programs, like we observe in Colorado 3) Grantees (such as businesses) will not have the incentive nor finances to create programs to reduce/mitigate hazardous materials. <p>These are just examples of some of the harmful effects of cutting this funding from the budget.</p>	<p>Colorado Department of Public Health and Environment Pollution Prevention Advisor Board Member</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>
<p>Pollution Prevention Program [P2]</p>	<p>Information Sharing and Education on P2- Grants, training and programs for applying successful pollution prevention activities across industry sectors.</p> <ul style="list-style-type: none"> • In order to succeed in pollution prevention, manufacturers need a reputable, consistent, and accessible forum to obtain 	<p>Ben McKnight EHS Director Electro-Spec, Inc. and Chair, Indiana Partners for Pollution Prevention - Executive Committee</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018</p>

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	<p>information. Gaining knowledge from their peers in other industrial sectors is the reason for Indiana's Partners for Pollution Prevention 20 years of success. This knowledge has been acquired during low cost training, conferences, facility tours, and networking programs. We suggest that the OCSPP's Key Programmatic Activities include Assisting in Regional and State Pollution Prevention Programming.</p> <p>P2 Technology - Grants, training and programs for applying successful pollution prevention technologies across industry sectors.</p> <ul style="list-style-type: none"> • In order to scale up successful P2 technology, manufacturers need information on its efficacy and return on investment. If the return on investment exists, most organizations will move forward without outside sources of funding. However, these P2 technologies can only be applied if the organizations have adequate information and can confirm its efficacy in their setting. Indiana's Partners for Pollution Prevention members have gained this knowledge in the past through EPA grants, training and programs. We believe without these grants, training and programs in place, organizations will no longer have the information they need to invest their funds with confidence and certainty. We suggest that the OCSPP's Key Programmatic Activities include Assisting: in Regional and 		<p>President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>

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	State Pollution Prevention Technology Development.		
Pollution Prevention Program [P2]	Denver Water recognizes economic, environmental, and safety benefits associated with source reduction of hazardous materials, which is a major tenet of the Pollution Prevention Program. By reducing its hazardous materials, Denver Water is benefitting from reduced disposal costs and improved worker safety while also honoring the environmental commitment we've made to the communities we serve. The Case Study Clearinghouse feature of the P2 Program provides Denver Water a convenient means of obtaining benchmark data to advance its process improvement and cost reductions initiatives. By failing to fund this program it can be argued that the proposed 2018 National Program Manager budget is negatively impacting the ability of businesses to operate in an efficient and safe manner.	Denver Water	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.
Pollution Prevention Program [P2]	I strongly urge the EPA to restore pollution prevention funding within the FY2018-2019 NPM to continue support for national pollution prevention efforts, as well as valuable state programs such as the Environmental Leadership Program and resources such as the state Pollution Prevention Specialist.	Amanda Brimmer - Private Citizen/Colorado Pollution Prevention Advisory Board Member	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to

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<p>Pollution Prevention Program [P2]</p>	<p>Pollution Prevention (PP or P2) is completely missing in the draft key programmatic activities. We fully support the inclusion and strengthening of P2. Nationwide, P2 helps businesses, particularly small to medium sized manufacturers, become more efficient and competitive. P2 programs have been a relatively small investment by EPA and the benefits are supported by the quantitative reporting requirements of the grants. The effective partnerships between the states and EPA through P2 activities should be continued in order to strengthen and expand employment of U.S. citizens in stable, secure, well-paying jobs.</p>	<p>Clemson University (the SC E3 (South Carolina - Economy, Energy, Environment) Initiative)</p>	<p>revisions in the NPM Guidance.</p> <p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>
<p>Pollution Prevention Program [P2]</p>	<p>Pollution prevention should be one of the Agency's primary tools for advancing environmental stewardship, pursuing sustainability, ensuring chemical safety, and promoting economic growth.</p> <p>Congress enacted the Pollution Prevention Act of 1990, 42 U.S.C §13101 et seq., and established a national policy that pollution should be prevented or reduced at the source whenever feasible. This policy supports the core mission of EPA. The Pollution Prevention (P2) Program seeks to assist businesses to alleviate environmental problems by achieving significant reductions in the generation of hazardous releases to</p>	<p>Northeast Waste Management Officials' Association (NEWMOA): submitted on behalf of: Connecticut Department of Energy and Environmental Protection (CT DEEP), Massachusetts Department of Environmental Protection (Mass DEP), New Hampshire Department of Environmental Services (NH DES), New Jersey Department of</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>

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	<p>air, water, and land; the generation of air and water pollutants; energy use; and water use. The P2 Program provides significant support for state and tribal programs, businesses, and communities. At the same time, EPA's P2 Program helps smaller businesses and others reduce costs by implementing preventative strategies. The National Program Manager's Guidance should reflect a strong and continued commitment in the programs and policies enacted under the Pollution Prevention Act.</p> <p>Pollution prevention (P2) is not included as a Key Programmatic Activity in the proposed 2018-2019 National Program Manager's Guidance for the Office of Chemical Safety and Pollution Prevention, and pollution prevention programming and priorities are completely absent. NEWMOA urges EPA to restore the pollution prevention programmatic activities in the NPM Guidance.</p> <p>The Pollution Prevention Act mandates that EPA establish a grant program to support innovative state pollution prevention (P2) initiatives and that states provide a significant match to the federal funds. Through this mandate and federal/state partnerships, EPA and states have been funding state and local government, university, and non-profit pollution</p>	<p>Environmental Protection (NJ DEP), New York State Department of Environmental Conservation (NYS DEC), Rhode Island Department of Environmental Management (RI DEM), and Vermont Department of Environmental Conservation (VT DEC)</p>	

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	<p>prevention initiatives for more than 25 years. These grants are one of the primary ways in which the Agency achieves its pollution prevention goals. They have supported numerous successful projects that have benefited businesses, institutions, and communities. The relatively small federal expenditure on Pollution Prevention, Pollution Prevention Information Network (PPIN), and Source Reduction Assistance (SRA) Grants has resulted in significant pollution reductions and cost savings for businesses over the years. NEWMOA considers these grants and the program to be essential to achieving EPA's mission, goals, and objectives.</p> <p>The National Pollution Prevention Data System compiled data from pollution prevention programs in the U.S. from 2001 to 2010 and reported that they helped to:</p> <ul style="list-style-type: none"> • Reduce more than 66 billion pounds of hazardous materials and waste • Save more than 40 billion gallons of water • Avoid the discharge of 186 million pounds of water pollutants and the emission of 1.5 billion pounds of air pollutants • Save more than 71 billion kilowatt hours of energy – resulting in a cost savings of more than \$7 billion to business 		

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	<p>The National Program Manager’s Guidance for the Office of Chemical Safety and Pollution Prevention should reflect the final 2018 federal budget and not the President’s proposed budget.</p> <p>If Congress appropriates funds for the P2 Program and state grant programs - P2, PPIN, and SRA Grants - the Agency should amend the NPM Guidance to restore all relevant P2 programming, goals, and objectives.</p> <p>In the Fall of 2016, the Agency solicited input from states’ P2 programs on areas of focus for the FY2018-2019 NPM Guidance. When funding for these programs is appropriated, the Agency should consider this input in developing its program goals, objectives, and priorities. We encourage EPA to partner with state programs to establish national priorities and program objectives.</p>		
<p>Pollution Prevention Program [P2]</p>	<p>States recommend that OCSPP continue its commitment to the national Pollution Prevention Act. Unlike the FY 2016-2017 NPM Guidance document, there is no mention in the current guidance of how EPA will implement a strategy to promote source reduction, as authorized under PPA Section 6604, or make matching grants to states for programs to promote the use of source reduction techniques by businesses, as authorized under PPA Section 6605. Many</p>	<p>ECOS</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President’s Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President’s Budget. The EPA’s funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to</p>

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	states have had success in utilizing these actions and encourage OCSPP to reconsider it for its current guidance.		revisions in the NPM Guidance.
Pollution Prevention Program [P2]	<p>The National Pollution Prevention Roundtable, a nongovernmental organization dedicated to source reduction recommends that OCSPP acknowledge the mandates under the federal Pollution Prevention Act of 1990.</p> <p>We agree with the Environmental Council of the States (ECOS) that unlike the FY 2016-2017 NPM Guidance document, there is no mention in the current guidance of how EPA will implement its strategic plan to promote source reduction, as authorized under PPA Section 6604, or make matching grants to states for programs to promote the use of source reduction techniques by businesses, as authorized under PPA Section 6605. Many states have had success in utilizing these actions and encourage OCSPP to reconsider it for its current guidance.</p> <p>There is no mention on how EPA shall review regulations of the agency prior and subsequent to their proposal to determine their effect on source reduction.</p>	National Pollution Prevention Roundtable	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.
Pollution Prevention Program [P2]	According to the draft Office of Chemical Safety and Pollution Prevention (OCSPP) Guidance document, the Pollution Prevention Program has been removed from the guidance. We encourage you to recognize	Colorado Department of Public Health and Environment; Division of Environmental Health and Sustainability (DEHS)	The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance

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	<p>the benefits that pollution prevention (P2) offers. P2 minimizes costs, reduces risk and eliminates waste for companies. Colorado has successfully used P2 principles to support our Environmental Leadership Program which offers benefits and incentives to members that voluntarily go beyond compliance with state and federal regulations and are committed to continual environmental improvement. The program aids in the reduction of GHG emissions, water usage and hazardous waste generation by increasing the number of facilities that adopt Environmental Management Systems (EMS) and commit to sustainability goals to continually improve their operations and reduce their environmental impact.</p> <p>Colorado has also used the P2 framework to support long-term process improvements and best management practices in commercial and industrial scenarios that reduce or eliminate waste before it is generated. These programs produce value both for businesses and the surrounding community.</p>		<p>documents are planning documents based on the funding levels requested in the FY 2018 President's Budget. The EPA's funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>
<p>Pollution Prevention Program [P2]</p>	<p>The Pollution Prevention Advisory Board is concerned about the absence of the federal Pollution Prevention Program within the Draft NPM Guidance. Pollution Prevention activities at federal, state and local levels foster innovation and improve the health of communities across the country.</p>	<p>Colorado Pollution Prevention Advisory Board (PPAB)</p> <p>The PPAB is a governor-appointed board, established in 1992</p>	<p>The agency has received comments regarding the funding levels requested for the EPA in the President's Budget for fiscal year 2018 as they relate to the FY 2018-2019 NPM Guidance documents. The FY 2018-2019 NPM Guidance documents are planning documents based on the funding levels requested in the FY 2018</p>

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	<p>In our work as a board, we see the valuable impacts of Colorado’s state-level pollution prevention efforts, such as the Environmental Leadership Program (ELP) and Colorado’s Pollution Prevention Program. The PPAB urges the EPA to include pollution prevention as a priority in the FY 2018-2019 NPM to protect environmental and public health and encourage business innovation.</p>	<p>through the Colorado Pollution Prevention Act. The PPAB advises the Colorado Department of Public Health and Environment (CDPHE) on pollution prevention programming and policy.</p>	<p>President’s Budget. The EPA’s funding levels for FY 2018 will be determined through the annual federal appropriations process. Enactment of the FY2018 Budget by Congress may lead to revisions in the NPM Guidance.</p>