

**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**  
**FY 2023-2024 NATIONAL PROGRAM GUIDANCE**  
**RESPONSE TO PUBLIC COMMENTS**  
EPA - 743S22001

Comment	Commenter(s)	Location in Draft Guidance	National Program Offices Response	Action Taken in Final Guidance
<p>On Page 30 of the draft OCSPP NPG for FY 2023-2024, there appears to be an unintended hard return after the word “with and before the words “limited-English...” as shown below.</p> <p><b>“...activities for individuals with limited-English proficiency and individuals with disabilities.”</b></p>	<p>Nebraska Department of Agriculture</p>	<p>p. 30 of 33</p>	<p>Correction made.</p>	<p>Deleted hard return.</p>
<p>The NSC supports and agrees with the purpose and ideals of the EPA P2 Program as outlined in the P2 program description.</p>	<p>National Steering Committee (NSC) for the national network of state Small Business Ombudsman (SBO) and Small Business Environmental</p>	<p>H. Program Priority: Pollution Prevention (P2), Page 23</p>	<p>Thank you for supporting the goals and objective outlined in the P2 program description.</p>	<p>Made no changes to NPG.</p>

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	Assistance Programs (SBEAP)			
<p>The NSC encourages EPA to share with regional SBEAPs any regional P2 case studies. The SBEAPs are often involved in P2 projects with small businesses and can also serve as an additional platform for communications as a means of amplification of successes.</p>	NSC	<p>Enhance P2 Communications and Amplification, Page 25</p>	<p>The P2 program maintains a P2 case studies web page which houses detailed studies on P2 best practices, challenges for implementing P2 and lessons learned. These case studies have relevance to states, tribes, businesses and other NGOs. The case studies may be accessed here:  <a href="https://www.epa.gov/p2/pollution-prevention-case-studies">https://www.epa.gov/p2/pollution-prevention-case-studies</a>.  The P2 program in the process of updating this page with new case studies. EPA welcomes the encouragement to share P2 case studies with regional Small Business Environmental</p>	<p>Made no changes to NPG.</p>

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			<p>Assistance Program's (SBEAPs).</p> <p>Also, under EPA's P2 grant programs, grantees are required to develop and share at least one case study detailing the grant activities undertaken. The P2 program supplies guidance within the appendices of its' grant announcements noting the elements to include in a case study in order to make the work relevant to states, tribes, businesses and other NGOs. The program further emphasizes in its' announcements and has an evaluating factor of its' grant applications, the need for eventual grant recipients to amplify P2 best practices and widely share lessons</p>	

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			learned so that P2 information, tools are readily available. This type of outreach contributes toward increasing the knowledge and benefits of P2/source reduction.	
The NSC would like to remind EPA that the SBEAPs are designed as technical assistance providers to small businesses like those often found in EJ communities. Many (though not all) SBEAPs include P2 activities as part of the technical assistance they provide or may be connected with a specific state P2 program. As such, the SBEAPs could be a great resource as an opportunity for P2 technical assistance.	NSC	Nurture External Capacity to Achieve Results, Page 25	EPA’s P2 program continually seeks ways to expand its outreach to interested partners and stakeholders.	Made no changes to NPG.
Suggest changing “fair treatment” to “equitable treatment”	Environmental Council of the States (ECOS)	Page 3 (Section 1. Introduction second bullet point)	Thank you for your comment.	Made no changes to NPG.
EPA should explore the opportunity to connect section F (TRI) to the EJ TRI work currently being developed as well as outreach to states to use those tools.	ECOS	Page 14 (Section F)	EPA’s TRI program continually seeks ways to expand outreach to interested partners.	Made no changes to NPG.

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<p>OPPT’s lead risk reduction program may benefit from including an investigation into other sources of lead exposure for children and sharing this information as part of outreach programs. For example, King County in Washington state recently identified high levels of lead in cookware. There are likely other products that are contributing to lead exposure.</p>	<p>ECOS</p>	<p>Page 19 (Third bullet point under strategy)</p>	<p>EPA agrees that identifying and sharing potential sources of lead exposure is important in the overall effort to protect the public from the harmful effects of lead. EPA provides publicly accessible information on its website on the potential sources of lead contamination and exposures (<a href="http://www.epa.gov/lead">www.epa.gov/lead</a>) and plans to continue to communicate this and other important lead health information during EPA outreach programs, training, and activities.</p>	<p>Made no changes to NPG.</p>

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<p>Is there a role for manufacturers in the first bullet point under “Nurture External Capacity to Achieve Results”? If so, it would be good to add SCIL to the list. Some businesses may be looking for products but others may be looking for chemicals.</p>	<p>ECOS</p>	<p>Page 25 (First bullet under “Nurture External Capacity to Achieve Results”)</p>	<p>The section entitled, “Nurture External Capacity to Achieve Results,” contains a second bullet which builds off the first bullet noted in the comment. There is a role of the Safer Chemical Ingredients List within the P2 program framework. The second bullet builds off the language shared under the first bullet.</p>	<p>Made changes to NPG on p. 25.</p>
<p>Considering NEA #6 and the addition support for the Biden Administration priorities related to environmental justice and climate change are very broad and ambiguous. We recommend more specificity around how to address these topics, including what P2 opportunities may benefit Indian Country and Alaskan Native Villages and what P2 opportunities or sectors EPA sees as a priority for addressing climate change. It is currently hard to know where to start with these broad concepts.</p>	<p>ECOS</p>	<p>Page 24 (First and second paragraph under Section II – H – Strategy)</p>	<p>EPA’s P2 program is currently developing two new P2 grant programs planned for 2023, which are supported by Infrastructure Investment and Job Act funds. These new grant programs will provide additional details on how P2/source reduction can address human health and environmental</p>	<p>Made no changes to NPG.</p>

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			<p>concerns in disadvantaged communities. To provide specificity to the structure of these anticipated grant programs, the P2 program will conduct a series of listening sessions focused on identifying EJ and climate change issues that are particularly relevant to disadvantaged and environmental justice communities.</p>	
<p>For the third sentence under “Description”, update to: “...reduce expenditures, reduce waste, or eliminate toxic chemical use that immediately translates to...”</p> <p>“Eliminate waste altogether” is a bit repetitive, and it is important to include and distinguish the difference between toxic chemicals and wastes. Pollution prevention focus on the full spectrum, including upstream chemical use and</p>	ECOS	Page 23 (First paragraph under Section II – H – Description)	Thank you for your comment.	Made no changes to NPG.

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downstream waste generation.				
Suggest clarifying the recommendation to regional offices included in “Regional offices should support states and tribes who are developing or revising the scope of their plans by: (e.g., expanding the scope by (1) reducing chronic exposure of pollinators to low levels of pesticides; (2) encouraging agricultural practices that reduce the overall environmental loading of pesticides; and (3) reducing possible pesticide contamination of wild blooming host plants near treated cropland) pollinator protection plans” or otherwise clarifying the statement.	ECOS	Page 5 (Section II B)	Agreed.	Updated NPG: Regional offices should support states and tribes who are developing or revising the scope of their plans to include: (1) reducing chronic exposure of pollinators to low levels of pesticides; (2) encouraging agricultural practices that reduce the overall environmental loading of pesticides; (3) reducing possible pesticide contamination of wild blooming host plants near treated cropland; (4) increasing pollinator habitat; and (5) expanding outreach/education regarding all of the factors influencing declines in pollinator

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				health.
Consider adding “pollution prevention” to list “for the purposes of addressing toxic chemicals in their communities under their own authorities, particularly for community waste reduction and clean-up actions.”	ECOS	Page 16, (Section II, F)	Thank you for the suggestion. We will look into this further.	Made no changes to NPG.
Under activities, consider collaboration with initiatives beyond EPA (such as NSF Industry-University Cooperative Research Centers) that are commercializing solutions based in the principles of green chemistry.	ECOS	Page 25 (Section II, H)	Thank you for the suggestion. We will look into this further.	Made no changes to NPG.
Additional funding is needed at the Navajo Nation for the Navajo Environmental Protection Agency Pesticides Program to implement its program. What formula will be used to determine funding amounts? The mass of the land to cover should be taken into consideration.	Navajo Nation	Pesticides Cooperative Agreements	The current funding formula does evaluate tribal land mass. However, OCSPP will update the data and the formula once additional tribal funds are available.	Made no changes to NPG.
In that context, we see an opportunity for EPA to focus on "streamlining the business processes (page 9 of the NPG document)" and expand it for TSCA and PFAS as well. That clarity on actions and measurements on business processes would provide guidance to the regional	ECOS	Office of Land and Emergency Management (OLEM) NPG: Page 9, Page 24-25	EPA provides publicly accessible information on its website <a href="https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-">https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/risk-management-</a>	Made no changes to NPG.

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<p>offices, states, manufacturers, suppliers, customers and other involved stakeholders in those processes. For example, there are more than 43,000 active chemicals in the market and EPA processes approximately 500 chemicals every year. However, the NPG document mentions only PCB material regulated under TSCA (Page 24-25). The need to address the plan to streamline that investigation, risk assessment, and stakeholder communication process for other active chemicals that pose high risk is critical in this emerging contaminants trend. The PFAS strategic roadmap states that the regulatory scope under OLEM is still seeking public comments. The linkage and measurable actions for each of its impacts is not clear in the NPG. This generic approach might create confusion to the regions and states and clarifying the PFAS area under streamlining the businesses might lead to the efforts accomplishing our shared goals. In summary, the national priorities of EPA to be aligned and linked well with measurements in the streamlining business processes section in order to</p>			<p>and-polyfluoroalkyl-substances-pfas</p>	

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accelerate environmental protection at national, regional and state levels.				