

FY 2014 OCSPP EXTERNAL COMMENTS AND RESPONSE TO COMMENTS SUMMARY TEMPLATE

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
ISSUE AREA—NATIONAL AREA OF FOCUS: STRENGTHENING STATE/TRIBAL PARTNERSHIPS THROUGH CONTINUED EFFECTIVE MANAGEMENT OF GRANTS/ COOPERATIVE AGREEMENTS				
Consider utilizing grants and cooperative agreements to enlist the assistance of state and local government environmental laboratories to accomplish OCSPP's goals. APHL and its member laboratories work closely with EPA through a cooperative agreement with the Office of Water and are familiar with the operations of EPA. OCSPP can develop closer relationships with states through a working arrangement with APHL and its member, government laboratories.	Assoc. of Public Health Laboratories	Page 8 et seq.	We will look into this suggestion should additional funding become available.	No change.
ISSUE AREA—NATIONAL AREA OF FOCUS: COORDINATING WITH STATE/TRIBAL PESTICIDE AGENCIES AND REGIONAL WATER PROGRAMS TO OBTAIN PESTICIDE WATER QUALITY MONITORING DATA				
Consider utilizing state and local government environmental laboratories to assist in obtaining and evaluating pesticide water quality data. OCSPP can significantly advance its goal of coordinating with state agencies for pesticide water quality monitoring through relationships with state and local government	Assoc. of Public Health Laboratories	Page 10 et seq.	We agree that state and local government environmental laboratories can be excellent resources in obtaining and evaluating water quality data related to pesticides and we strongly encourage these laboratories to share with EPA any pesticide water quality data or evaluation they have not already submitted to EPA. The new guidance for our pesticide cooperative agreements with states and	No change.

environmental laboratories.			tribes will also encourage state and tribal pesticide agencies to seek this information if it already exists. Our FY 14 NPM gets at this point by asking the regional pesticide offices to work with the regional water offices to obtain this data if it already exists. However, due to resource limitations, we do not believe we can ask state or local environmental laboratories to obtain new monitoring data or conduct new evaluations they are not already doing as part of an existing program.	
ISSUE AREA—NATIONAL AREA OF FOCUS: POLLUTION PREVENTION PROGRAM				
Page 20. Recommend more clearly incorporating sustainability and product life cycle terms and concepts into the description.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	Page 20	We did not incorporate suggested edit because the description paragraph mirrors what is in the President’s Budget. While the guidance briefly incorporates sustainability, the program is planning to further emphasize incorporating sustainability concepts in the Agency’s next strategic plan cycle beginning in FY15.	No change.
Page 21, recommend that partnerships with other federal and state agencies also be suggested in this partnership initiative, for example, partnering with the Department of Agriculture.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	Page 21	The revised language clarifies the additional parties involved with E3 partnership work.	Modified.

ISSUE AREA— 2. REGION-SPECIFIC PESTICIDE PRIORITY: BED BUG OUTREACH/ASSISTANCE				
Page 26, recommend adding research and development. EPA could either initiate and/or partner to encourage research and development into new methods, products, and technologies. This would apply not only to this issue but other issues.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	Page 26	We agree that encouraging research and development for safe and effective control of bedbugs is important, and OPP does use various mechanisms to accomplish this goal. However, we do not believe that this is an effective strategy in the context of this NPM Guidance, which is intended to outline the work the regions can do to support national pesticide priorities. Instead, we believe regional resources can most effectively address bedbugs through the education and assistance activities described in the proposed FY 14 NPM guidance.	No change.
ISSUE AREA— GENERAL COMMENTS				
ECOS supports many of the aims in the OCSPP NPM guidance document to prevent pollution and ensure the safety of chemicals.	Teresa Marks President, ECOS	Page 6	OCSPP thanks ECOS for taking the time to review the agency's NPM Guidance documents and its support of OCSPP programs.	No change.