

OCSPP'S FINAL FY 2015 ADDENDUM TO FY 2014 NPM GUIDANCE

FY 2015 EXTERNAL COMMENTS AND RESPONSE TO COMMENTS SUMMARY

Comment from State, Tribe, or Other Stakeholder	Commenter(s)	Location in Draft Guidance	NPM Response	Action Taken in Final Guidance
<i>Issue Area: Pollution Prevention Program</i>				
Page 7, suggest adding the word “quality” to number. That is “Increasing the number and quality” of E3 facility assessments or “increasing the number while maintaining or improving quality”.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	Page 7	OCSPP agrees.	Changed the bullet on Page 7 to read: <i>Increasing the number of E3 facilities assessments while maintaining or improving the quality of those assessments.</i>
Page 8, support using the term “products” instead of “electronics” in order to broaden the scope of the initiatives and efforts.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	Page 8	OCSPP agrees.	No action needed.
It references advancing new state, local, and tribal partnerships. The Edit/Activity references advancing tribal partnerships. It leaves out any reference to state and local partnerships. Is this an oversight or an intent to	Phyllis Strong, Mark Snyder – Minnesota Pollution Control Agency, P2 Program	Page 19	The Addendum edit is intended to place an emphasis on developing and nurturing tribal partnerships, since the program is already putting considerable attention and effort toward state and local partnerships. The emphasis on tribal relationships is also made in the Lead Risk Reduction National Area of Focus for the same reasons.	Changed text in Addendum to read: <i>Regional offices are encouraged to continue building relationships with tribes by establishing and nurturing capacity building, technical assistance and research partnerships and conducting</i>

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place additional focus on tribal partnerships? If the latter, that should be clarified.			<i>Clarifications to the proposed Addendum text are made in both sections.</i>	outreach and consultation.
Guidance can become too limiting. Need to ensure that grant guidance for P2 and SRA grants reflects the whole breadth of nation program guidance as opposed to narrowly limiting scope of work.	Phyllis Strong, Mark Snyder – Minnesota Pollution Control Agency, P2 Program	<i>Pages 19-21</i>	<i>OCSPP disagrees that the proposed Addendum text limits the focus of the P2 and SRA grants. The program-specific references are preceded by the words “such as”, which casts them as examples, not limiting focus.</i>	<i>No change.</i>
Issue Area: CARE				
Page 8, Recommend that consideration be given to making the CARE program a “self-implementing” and self-funded program where EPA regions, in conjunction with states and tribes, could recognize communities that achieve results in this area. Recommend that consideration be given to diverting penalty money from civil penalties to fund these types of community environmental efforts.	Division of Solid Waste Management (DSWM) Tennessee Department of Environment & Conservation (TDEC)	<i>Page 8</i>	<i>Comment seeks a policy and budgetary decision that the NPM Guidance is not designed to resolve.</i>	<i>No change.</i>