www.p2.org NPPR@p2.org

Where Sustainable Practices Begin!

July 22, 2019

Via Electronic Mail to Dunn.Alexandra@EPA.gov

Attn: Alexandra Dunn, Assistant Administrator Office of Chemical Safety and Pollution Prevention, 7101M Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

RE:

National Pollution Prevention Roundtable Board of Directors

Feedback from EPA Pollution Prevention Grantee Meeting in Denver, CO

Dear Ms. Dunn:

The National Pollution Prevention Roundtable (NPPR) Board of Directors would like to take this opportunity to provide feedback regarding the Environmental Protection Agency (EPA) Pollution Prevention (P2) Grantee Meeting held in Denver, Colorado, May 15-16. NPPR is the only membership organization in the United States devoted to P2, with the mission of providing a national forum for promoting the development, implementation, and evaluation of efforts to avoid, eliminate, or reduce pollution at the source. The NPPR Board of Directors and organizational membership is comprised of a number of current and past P2 grantees who attended the P2 Grantee Meeting in Denver.

NPPR commends and acknowledges the work of EPA, the Office of Chemical Safety and Pollution Prevention (OCSPP), and all EPA Regional staff that planned, coordinated, and hosted the P2 Grantee Meeting in Denver. The meeting provided an open and engaging venue for P2 grantees to learn, exchange ideas and best practices, and strengthen professional networks. EPA staff remarked during the meeting that this was the first time in ten years that EPA and P2 grantees from across the country have come together to engage in a national dialogue to advance the successes of the program. The NPPR Board of Directors is encouraged by EPA's interest in building a more robust national dialogue and engaging grantees in programmatic decision making and planning. Further, NPPR believes that through continued engagement and collaboration with grantees, states, tribes, and other partners, EPA is embracing cooperative federalism and establishing a strong foundation for the future success of P2 activities.

Throughout the course of the meeting, EPA staff and P2 grantees covered a broad range of topics, including the new P2 grant program strategic approach, documentation and dissemination of P2 best practices, creating a national P2 community, technical assistance considerations, and discussion on future outlook of aspects of the P2 program. Based on the information presented and discussed at the P2 Grantee Meeting, the NPPR Board of Directors recommends EPA consider the following actions to continue to engage P2 grantees and build on the momentum of the recent meeting:

- NPPR appreciates EPA's interest in seeking feedback on the new P2 Grant Program Strategic Approach. Engaging stakeholders throughout the planning process would increase the effectiveness of the plan and identify the resources necessary to accommodate it. NPPR encourages OCSPP to engage the external community when making large, programmatic changes and decisions in the future.
- One of the sessions at the Grantee Meeting provided a high-level overview of the new Chemical Safety and Source Reduction Hub. As part of this session, EPA asked for feedback from grantees on idealized capabilities of the hub. NPPR encourages OCSPP to provide progress updates to meeting attendees on efforts to incorporate hub functionalities that were recommended during the Grantee Meeting into the platform. Further, NPPR encourages OCSPP to share a timeline for development and launch of various portions of the hub as well as quarterly (or more frequent if necessary) calls to provide updates on the status of the hub.
- To strengthen engagement with P2 grantees, NPPR encourages EPA and its vendor, Eastern Research Group, to work with NPPR to establish an approach for beta testing the new hub before publicly launching the platform. The NPPR Board of Directors welcomes the opportunity to provide support to EPA on this front and looks forward to this potential collaboration.
- Following the meeting session pertaining to the hub, EPA facilitated a discussion about building a national network and approaches to improving communication, sharing information, leveraging expertise across P2 programs, etc. NPPR fully supports national and regional dialogue, networking and other undertakings that enhance the capabilities of individual P2 programs to better serve their customers. NPPR encourages OCSPP to work with our organization to leverage our existing network to accomplish some of these mutually beneficial goals. NPPR has the expertise and desire to support a national presence and continue tasks such as P2 Week, the MVP2 awards, a national newsletter, a national conference, facilitating peer-based workgroups etc. and is accessible through the ERG contract to complete them.

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• NPPR was excited by EPA's interest in engaging P2 grantees on potential future directions for the P2 program, including around National Emphasis Areas (NEA). A number of shared priorities emerged across states and P2 programs. As planning and development for the next round of P2 grants begins, NPPR encourages OCSPP to provide updates on the status of recommended NEAs that were identified during this meeting, and decisions as to why those were included/not included.

NPPR commends EPA for the significant amount of work it has committed to P2 and engaging P2 grantees. As was exemplified from our meeting in Denver, strong collaboration and partnerships are the essence of a successful P2 ecosystem. NPPR appreciates EPA's commitment to fostering innovation through collaboration and we look forward to future opportunities to be engaged in program and resource development discussions.

NPPR appreciates the opportunity to be part of the P2 conversation, program, and its future and would like to request a meeting with you and our Board of Directors to further discuss how NPPR can continue a successful partnership with EPA. I will be in contact in the near future to schedule a call. Thank you for your consideration in these matters.

Sincerely,

Laura Henne

Chair, Board of Directors

National Pollution Prevention Roundtable

Cc: David Widawsky, via email at Widawsky.David@EPA.gov