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Charlotte Bertrand, Acting Principal Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
William Jefferson Clinton Building, Mail Code 5106R
1200 Pennsylvania Avenue, NW Washington, DC 20460

Dear Ms. Bertrand:

We are writing to request that EPA initiate a dialogue with state environmental agencies regarding the future of the Pollution Prevention (P2) Program and actively seek state involvement in EPA's deliberations on this important program. The Connecticut, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont environmental agencies (the participating NEWMOA members) are particularly interested in learning about EPA's vision for the P2 Program and the role of regional coordination and support, EPA's plans to create a "National P2 Hub", and efforts to attain sustainable funding. We would like to schedule a meeting with EPA in the region to follow-up on this letter and discuss our proposed dialogue on the future of pollution prevention programs. NEWMOA will be holding its annual Board of Directors' Meeting on September 19th and 20th in upstate New York and we invite you to join us at that time.

The 1990 Pollution Prevention Act establishes P2 as the preferred strategy for achieving environmental protection. Among its many provisions, the Act includes funding for state pollution prevention programs as a primary component of EPA's implementation activities. These programs have a proven record of success. From 2001 to 2010 pollution prevention programs in the U.S. helped to: 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; and save more than \$7 billion. NEWMOA considers P2 a key national strategy for achieving state and national environmental sustainability goals.

The "Office of Chemical Safety and Pollution Prevention (OCSPP) National Program Manager (NPM) Guidance Fiscal Years 2018-2019" issued in August of 2017 makes no mention of pollution prevention. We understand this is due in part to budget uncertainties. However, in the absence of NPM guidance for the P2 Program, NEWMOA recommends that OCSPP create an interim road map that articulates goals and objectives for the P2 Program. It is vital that the EPA communicate its priorities with the states and the public and create a shared vision for how the Program will advance its National Emphasis Areas and other priorities. We believe that EPA should work in partnership with state programs to advance P2.



With the discontinuation of funding for the Pollution Prevention Resource Exchange (P2Rx), previously funded under the Pollution Prevention Information Network (PPIN) grant program, NEWMOA is particularly interested in engaging with EPA on its plans for a National P2 Hub. The P2Rx established the regional P2Rx Centers, which built regional networks, worked with the EPA and state programs, built a national information hub, delivered P2 information, and helped P2 programs to measure results. NEWMOA has been privileged to serve as the P2Rx Center for the northeast since the beginning of P2Rx in 1997.

NEWMOA recommends that any diversion of State and Tribal Assistance Grant P2 funds be done in consultation with the states programs. NEWMOA's members value coordination at a regional level over information sharing at the national level. The regional efforts are based on a much greater understanding of local and regional needs. The economically vital sectors and environmental problems in the northeast are not the same as in other parts of the U.S. In our experience, regional networks are more responsive to the networking and information needs of state and local programs than national networks.

NEWMOA is a non-profit, non-partisan interstate association that was established by the governors of the New England states as an official interstate regional organization, and formally recognized by the U.S. EPA in 1986. NEWMOA membership is composed of the state environment agency programs in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA provides a strategic forum for effectively solving environmental problems through collaborative regional initiatives that advance pollution prevention and sustainability, promote safer alternatives to toxic materials in products, identify and assess emerging contaminants, facilitate adaptation to climate change, mitigate greenhouse gas sources, promote reuse and recycling of wastes and diversion of organics, support proper management of hazardous and solid wastes, and facilitate clean-up of contaminant releases to the environment.

NEWMOA appreciates your consideration of our concerns and recommendations. Creating and sustaining successful partnerships among state P2 programs and with EPA is a priority for NEWMOA's members and aligns well with the EPA's focus on advancing cooperative federalism. We welcome the opportunity to discuss this matter at your convenience. Terri Goldberg, NEWMOA's Executive Director, or, Rich Bizzozero, Director of the Massachusetts Office of Technical Assistance and NEWMOA Pollution Prevention Program Chair, are happy to discuss next steps. You can reach Terri by email (tgoldberg@newmoa.org) or by telephone (617-367-8558 x302) and Rich by email (rich.bizzozero@state.ma.us) or by telephone (617-626-1080).

Sincerely,



Charles Schwer, Chairman
NEWMOA Board of Directors

cc. Jeffery Morris, Director, Office of Pollution Prevention and Toxics, EPA Headquarters
David Widawsky, Director, Chemistry, Economics and Sustainable Strategies Division, EPA Headquarters
Karen McGuire, Acting Director, Office of Environmental Stewardship, EPA Region 1
John Filippelli, Director, Clean Air and Sustainability Division, EPA Region 2

