THE

ENVIRONMENTAL

COUNCIL OF

THE STATES

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Alexandra Dapolito Dunn
  Executive Director &
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August 4, 2017

Kathy Sedlak O'Brien
Director, Office of Planning, Analysis and Accountability (OPAA)
Office of the Chief Financial Officer
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submitted via e-mail to: obrien.kathy@epa.gov

Dear Ms. O'Brien:

On behalf of the Environmental Council of the States (ECOS), I thank you for the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA or Agency) draft Fiscal Year (FY) 2018-2019 National Program Manager (NPM) Guidances.

ECOS is very appreciative of the Agency's receptiveness to state input in persevering with the two-year NPM cycle despite considerable uncertainty regarding the Agency budget in FY18-19. ECOS is also thankful for EPA's work to pursue early state engagement and to highlight opportunities for flexibility in accomplishing the work to protect human health and the environment. The NPM Guidances reflect much of the work that state, regions, and NPMs do together, common goals, and shared initiatives. Given the importance of cooperative federalism in our national system of environmental protection, we appreciate the ability to work together on these documents in a collaborative way.

ECOS submits the attached comments for your consideration using the required comment template. ECOS also commends to EPA's attention any NPM comments from states, as well as from the media-specific state associations such as AAPCA, ACWA, ASDWA, ASTSWMO, and NACAA.

Again, thank you for the opportunity to provide input on these draft Guidances.

Regards,

Alexandra Dapolito Dunn
Executive Director and General Counsel

cc:
ECOS Officers, Executive Committee, and Members
Ken Wagner, Senior Adviser to the Administrator for
  Regional and State Affairs
EPA NPM Program Manager Contacts

Issue Area	Comment	Commenter(s)
General- All NPMs	The principles outlined in ECOS' Cooperative Federalism 2.0 paper emphasized that states should have flexibility to determine the best way for their programs to achieve national minimum standards. ECOS believes that it will be beneficial to the cooperative federalism relationship for the NPM Guidance documents to include language wherever possible that encourages regional staff and states to collaboratively pursue this flexibility. States also need meaningful input on establishing and revising national minimum standards. Some effective avenues for flexibility include Performance Partnership Agreements/Grants (PPAs/PPGs), E-Enterprise Tradeoffs, Alternative Compliance Monitoring Tradeoffs (ACMS), and innovative financing models. To examine more areas for potential flexibility, please see ECOS' Field Guide to Flexibility and Results report.	ECOS
General- All NPMs	Over the course of 2017, ECOS has been working on a major project to change the way state environmental agencies tell their story through the use and graphical communication of performance measures and data. The ECOS Measures Project will create a small, manageable set of robust common measures that can serve as indicators of environmental quality and public health as well as economic impacts associated with protecting public health and the environment. States have worked to shift the focus from measuring outputs to measuring a more limited set of outcomes; an additional emphasis has been placed on using graphic design, dashboards, and other visual techniques to make the information contained in these measures clear and compelling to a broad audience. ECOS hopes that EPA will encourage their regional staff through the NPM Guidances to cooperate with states to align with and build on this effort, and to undertake further measures innovations. ECOS appreciates the support from OCFO as well as OW, OAR, OLEM, and OECA in these discussions as well as assistance in identifying access to state reported data.	ECOS
General- All NPMs	Presentation of quality data about regulated facilities is important to communicate to the public the compliance status of facilities as well as fully reflect actions states and EPA staff take related to compliance monitoring and inspections. It is important for EPA to work closely with states to ensure information from systems such as ICIS-NPDES is displayed appropriately, accurately, and timely through EPA's on-line ECHO data system. This may include identifying a process for timely resolution of potential problems once identified by a state/states, using timely data while ensuring accuracy, providing beta environments for states to view data sets before they are published, regular	ECOS

Issue Area	Comment	Commenter(s)
	and in-depth training for state users, and support for development of a joint governance system as appropriate. The E-Enterprise ECHO Team comprised of states and EPA is seeking to address these priorities.	
General- All NPMs	Regional Geographic Programs funded under EPA's budget serve as important resources to protecting and restoring local and regional ecosystems and support state agencies who are also investing in these priority areas. If Congress does not provide funding for these programs, EPA should work closely with states to adjust federal workload expectations commensurate with available funding.	ECOS
General- All NPMs	Through E-Enterprise for the Environment, ECOS' Innovation & Productivity Committee, and other contexts, ECOS has supported the ability of states to improve their efficiency and effectiveness in implementing environmental programs through streamlining and modernization activities. ECOS hopes that EPA program offices include guidance language wherever possible that encourages close, proactive communication between regional and state staff to identify and pursue opportunities for these activities.	ECOS

OCSPP: FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
II.1. Continued Effective Management of Pesticide Cooperative Agreements – Adequate Resources	States appreciate EPA's consideration of timely funds for states to implement FIFRA activities. States encourage EPA's consideration of funding for states to implement all chemical-related rules as appropriate, and express a need to use the federal funding in a flexible manner.	ECOS
Measure of Guidance Activities 2, 3, and 4.	States appreciate the flexibility in EPA's use of the Annual Commitment System (ACS) to track regional performance information and results, not proposing an ACS measure associated with Focus Areas 2, 3, and 4 to allow regional offices flexibility to direct their efforts where they are most needed and select the activities and level of effort appropriate for the needs of their region. ECOS recommends that EPA continue to highlight this language to address support for states to pursue flexibility and guidance on how to seek flexibility approval.	ECOS
II.1. Continued Effective Management of Pesticide Cooperative Agreements	States hope that OCSPP will continue to encourage and highlight modernization efforts of pesticide-related projects such as the Pesticides Data Accessibility and Label Matching project, and will	ECOS

Issue Area	Comment	Commenter(s)
	devote appropriate resources to support and advance this work.	
II. TSCA Implementation	States recommend that OCSPP's Key Programmatic Activities include the Strengthening of State and Tribal Partnerships through Effective Management of the Toxic Substances Control Act (TSCA). Through EPA grant funding, ECOS has collaborated with OCSPP's Office of Pollution Prevention and Toxics (OPPT) and states on the new TSCA amendment (Lautenberg Chemical Safety for the 21st Century Act) and general toxics issues. ECOS recommends that OCSPP's work with states on successful implementation of TSCA (i.e. sharing data, disclosure of CBI for administration or enforcement of a law, treatment of an individual, or responding to an environmental release or exposure) continue to be promoted and integrated with other programming where possible. ECOS also requests adequate resources and support for flexibility to facilitate state involvement by providing research, studies, training, demonstration, and technical assistance to states as EPA develops new rules and identifies implementation issues related to the reformed TSCA.	ECOS
Pollution Prevention	States recommend that OCSPP continue its commitment to the national Pollution Prevention Act. Unlike the FY 2016-2017 NPM Guidance document, there is no mention in the current guidance of how EPA will implement a strategy to promote source reduction, as authorized under PPA Section 6604, or make matching grants to states for programs to promote the use of source reduction techniques by businesses, as authorized under PPA Section 6605. Many states have had success in utilizing these actions and encourage OCSPP to reconsider it for its current guidance.	ECOS

OLEM FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
Introduction	States appreciate OLEM's statement that it "strives to provide flexibility and support for regional strategies that align with our shared priorities and goals." States encourage OLEM to continue to highlight its support for flexibility, guidance on how to seek flexibility approval, and readiness to assist with state, tribal, and local issues.	ECOS
Sustainable	States encourage OLEM to include SMM in their key	ECOS

Issue Area	Comment	Commenter(s)
Materials Management	programmatic activities. OLEM should continue to coordinate with national organizations such as ECOS which promotes and enhances state and territory involvement in the advancement and training of sustainable materials management and facilitates information exchange by and between states, territories, and federal agencies.	
ECHO and related databases	Presentation of quality data about regulated facilities is important to communicate to the public the compliance status of facilities as well as fully reflect actions states and EPA staff take related to compliance monitoring and inspections. It is important for EPA NPM offices such as OLEM to work closely with OECA and states to ensure information is accurately recorded through EPA's on-line ECHO data system. This may include identifying a process for resolution of potential problems once identified by a state/states.	ECOS
ECOS Measures Project	Through the ECOS Measures Project, ECOS is seeking to identify a limited set of common measures that better tell the story of what is being done to protect public health and the environment. ECOS and states will continue to work with EPA to identify and use compelling measures that appropriately reflect activities of states and EPA as co-regulators to protect public health and the environment.	ECOS
E-Manifest	States appreciate the guidance language that "all manifests will be sent to EPA and the states, and the states will have access to their data in the e-Manifest system when it is entered into the system and updated by the handlers. Although EPA's Final User Fee rule will be implemented by EPA in all states on the effective date of the rule, state adoption and authorization will allow states to retain enforcement authority for their manifest programs." States support the development of the e-Manifest system including robust inbound and outbound data services and look forward to continuing engagement with EPA on its further implementation.	ECOS
E-Enterprise for the Environment	States seek language in the guidance document highlighting the importance of E-Enterprise for the Environment and suggest the language specifically encourage coordination and flexibility related to E-Enterprise projects and priorities. While the guidance's Superfund Federal Facilities Restoration and Reuse section specifically addresses E-Enterprise in its discussion of streamlining business processes through an ePortal submittal system, ECOS encourages OLEM to also expand upon other E-Enterprise initiatives such as Smart Mobile Tools for Field Inspectors, a group with active state leadership and participation for efforts like the RCRA program.	ECOS
RCRA Permitting	OLEM notes headquarters "will develop, implement, maintain, and update" the national data system RCRAInfo. Some authorized states have chosen to use RCRAInfo as their system of record rather than build their own state's data system. When the lead program implementer, states and EPA need to access information to properly manage its program. As a shared system	ECOS

Issue Area	Comment	Commenter(s)
	and given recent direct database access changes, ECOS recommends OLEM continue to build web services that allow full data access for non-EPA users, continue to support RCRARep that provides user-friendly data reports for states, accelerate plans to develop robust inbound and outbound data flows, as well as develop comprehensive ad-hoc reporting functionality (similar to RCRARep) within the RCRAInfo system. ECOS appreciates the commitment from OLEM to develop services and recommends OLEM provide a timeline at the earliest opportunity to states indicating when requested services may be available. States as shared service users are appropriate to include in conversations to design and maintain the RCRAInfo shared system in the future. Page 15 notes: "Regions and states will conduct effective data collection and management... They will review reports to ensure data are entered, updated, and maintained in alignment with EPA policy..." These efforts would be enhanced and supported by a robust ability to download all the RCRAInfo data, allowing regions and states to create a wide variety of reports and tools to verify and utilized the data. Helping a user to access and utilize the data is a generally recognized method of encouraging the user to actively and effectively work on data quality. In the past, there has been an active RCRAInfo Management Board comprised of states, U.S. EPA Headquarters, and U.S. EPA Regions. ECOS recommends this body be reinvigorated as well as appropriate expert groups to provide recommendations that may result in overall system user improvements.	
RCRA Corrective Action and PCB Cleanup	States appreciate the language of OLEM providing leadership and facilitating communication and collaboration for the highest priority actions across the RCRA program with regions and states to ensure effective management and support, as well as the language on joint region-state implementation of the national RCRA Corrective Action program. It is important that states, regions, and OLEM coordinate through the funding transition and that OLEM work closely with the states towards meeting its program goals.	ECOS

OEI FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
Page 3 "Making a Visible Difference to Communities"	OEI notes it will facilitate limited shared service and e-transactions with external partners. States are working with OEI through E-Enterprise on a shared services strategy and appreciate this collaboration. OEI is encouraged to expand this to include "support and maintain" share services and to foster a culture that includes consideration of change management,	ECOS

Issue Area	Comment	Commenter(s)
	timely communication to all shared service users, accommodation for inbound and outbound data flows to non-U.S. EPA users, uptime, and others. It would be helpful to states for EPA to publish a strategic roadmap for all planned IT initiatives. This would enable states to strategically align their projects and possible funding with EPA's, and to decrease duplication of efforts.	
Data and Content Management	While states appreciate OEI's commitment to managing data, OEI is encouraged to build upon its key programmatic activities to include data collection, of which states play a key role. OEI is encouraged to provide opportunities for state input on the future direction of environmental and public health tracking and data collection process in addition to existing data collection and management efforts. Some examples of projects where states and EPA are discussing further collaboration follows: **Respectful Use of Data.** In March, 2011 ECOS passed Resolution 11-2 "Respectful Use of Data." One of the points states make in this resolution is to urge EPA to provide advance notification prior to EPA's release of state data, in particular noting a cooperative process for review and correction of data errors. States encourage OEI to work closely with EPA NPM offices to realize the ideas included in this resolution. **Colorado's Environmental Public Health Tracking Project.** Colorado Department of Public Health & Environment (CDPHE)'s Environmental Public Health Tracking Project's goals are to 1) provide data in an easily accessible way through a portal and 2) provide context for its data. Colorado is one of 25 states to receive funding from the Center of Disease Control and Prevention (CDC) to build and implement local tracking networks. Data collected through each state feeds into the national Tracking Network.	ECOS
Information Security	States appreciate OEI noting their information security goals for FY 2018-2019, including the bullet about focusing on training and user-awareness to foster risk and technology management. States encourage OEI to offer periodic opportunities for states to learn about federal IT requirements that may impact OEI system development or state requirements related to cyber-security.	ECOS
EPA Geospatial Platform	States appreciate the effort of EPA to build upon its FY 2016-2017 activities. In regards to the last bullet, "Use the GeoPlatform to publish internal and public mapping tools and make available a number of shareable maps, geodata services and applications," states still suggest OEI work with its co-regulator partners to establish a "Map Layer Marketplace" so the public, co-regulators and the regulated community can create custom web maps either on the E-Enterprise Portal or elsewhere that will allow users to analyze and access environmental data of their choosing in a geospatial context. Map layers could be secured using the federated E-Enterprise	ECOS

Issue Area	Comment	Commenter(s)
	Identity Management Solution.	
Pages 4-5: Exchange Network	States appreciate the collaboration with U.S. EPA and tribes since 1998 on the successful Exchange Network to efficiently exchange data among co-regulators. OEI notes it will "continue operations and research to maintain currency of data registries…" States, through E-Enterprise, are discussing state facility information along with U.S. EPA's Facility Registry Service and how these may be better integrated and business rules to guide this. EPA is encouraged to provide resources to continue to support this work so that reporting by the regulated community becomes more seamless across co-regulators.	ECOS
EPA Quality Program	States wish to be included in all decisions regarding EPA's guidance or use of data quality which may also apply to states. States and EPA should continue to work together on the E-Enterprise Advanced Monitoring team that has also discussed issues related to data quality and use.	ECOS
Continued Focus on Interoperability	States continue to express a need to keep interoperability as a focal point. An example follows: The **E-Enterprise Integrated Identity Solution Project** seeks to evaluate identity and access management integration of state Single Sign-On systems with EPA's Identity Bridge system and determine the impact of implementing a proposed E-Enterprise identity solution. Supported by EN funding, this work is led by NM with WY and ND participating.	

OITA FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
II.1. Tribal Program (Page 3): Federal-Tribal-State Partnerships	States recommend the list of EPA –Tribal Environmental Plan (ETEP) priorities include details of EPA's final FY 2017 Cross-Agency Strategy, "Launching a New Era of State, Local, Tribal, and International Partnerships" action plan to emphasize OITA's commitment to enhancing federal-tribal-state partnerships. ECOS' *Cooperative Federalism 2.0* paper similarly emphasizes this cooperative federalism in which states engage tribes and EPA consults with tribes in the implementation of federal programs, policies, and standards.	ECOS
Appendix B(Page 7): General Assistance Program	States recommend expanding on the implementation of solid and hazardous waste programs to incorporate rural waste management. Specifically, states seek increased communication and coordination among EPA, state, and tribal waste officials, and an EPA developed state and tribal emergency response network to help stakeholders	ECOS

Issue Area	Comment	Commenter(s)
	coordinate responses.	
Introduction (Page 2): Cross-office collaboration	In the third paragraph, states appreciate OITA's reference to working with leaders and experts from EPA's program and regional offices, other government agencies, tribes, foreign governments, and international organizations. States encourage continued collaboration across the EPA offices in order to minimize environmental impacts from emergencies on tribal lands that may involve multiple offices, such as water contamination.	ECOS

OAR FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
2. Program Activities	NPM guidance language should reference the benefit of collaborative efforts to develop shared services, to streamline programs (including process improvement), and to modernize systems including electronic reporting. Language should reference support for states to include streamlining and modernization activities in grant work plans with regions and recognize that there may be tradeoffs in workload as a result.	ECOS
Program Activities Section 2.1: National Ambient Air Quality Standards (NAAQS)	This section should include language in support of continued coordination between states and EPA related to the implementation of the Ozone and PM 2.5 NAAQS, SIP submittals, and upcoming rules including the Lead and Ozone NAAQS. States expressed interest in this coordination in the early engagement process, and ECOS' *Cooperative Federalism 2.0* paper emphasizes a model of cooperative federalism in which states engage with EPA in the development of national minimum standards to protect human health and the environment, and in any federal requirements regarding implementation of those standards.	ECOS
Program Activities Section 2.8: Mobile Source Programs	Similarly, the NPM guidance document should include language in support of continued coordination between states and EPA regarding Fuel Efficiency Standards and the Interstate Transport Rule.	ECOS
Appendix B, Item 3: Effective Grants Management	NPM guidance language should encourage state and EPA regional staff to pursue flexibility in state grant program implementation through the use of Performance Partnership Grants (PPGs). According to a report released in June by EPA's Office of Intergovernmental Relations (OIR), only 41 percent of PPG-eligible FY 2016 STAG categorical grant funds were being awarded and managed under a PPG.	ECOS
E-Enterprise for the Environment:	This section should include language in support of the joint-governance initiative, E-Enterprise for the Environment.	ECOS

Issue Area	Comment	Commenter(s)
Combined Air Emissions Reporting Team (CAER Team)	Specifically recognizing the CAER Team, under which state and EPA representatives work to modernize and streamline industry emissions reporting under multiple statutorily required programs to reduce regulatory burden and increase reporting efficiency and accuracy at the private, state, and federal level.	

OECA FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
Key Programmatic Activities, pages 4-5	OECA notes "adhere to CMS." ECOS recommends OECA add "adhere to CMS or approved ACMS as appropriate."	ECOS
Section II, A: Strengthening EPA/State Collaboration and State Performance	ECOS appreciates EPA's focus on strengthening the state-EPA partnership. ECOS' new Resolution 17-2 Requests EPA participate with states in their efforts to cultivate, design, and implement innovative compliance approaches to protect human health and the environment through pilots and shared governance, and allow proven innovative techniques to serve as true substitutes for traditional compliance activities.	ECOS
Section II, A: Strengthening EPA/State Collaboration and State Performance	States request that OECA more prominently reflect state performance under EPA approved Alternative Compliance Monitoring (ACMS) plans, in this document and elsewhere. On EPA's ECHO website, a general caveat statement is reflected on the bottom of individual state dashboard pages that "…some states may have alternative inspection plans." This important information can be easily overlooked and without it, the public may not have an accurate understanding of state performance under an EPA-approved alternate inspection plan.	ECOS
Measures, page 5	OECA notes it "provides monitoring in authorized programs." ECOS encourages EPA to more fully deploy an auditing approach rather than an individual transaction approach in its oversight of delegated or authorized states programs unless there are identified performance issues.	ECOS
Section II, B Addressing the Most Serious Noncompliance Concerns in Communities	States believe that EPA must continue to streamline the process for states to gain approval of ACMS plans and must more readily recognize in state-regional grant workplans adjusted inspection priorities when data is appropriately shared with EPA. ECOS further encourages OECA to support identification of and gathering needed data associated with ACMS requests to facilitate state efforts to focus limited	ECOS

Issue Area	Comment	Commenter(s)
	compliance activities in non-traditional areas.	
Section II, D Implementing National Enforcement Priorities	An off-cycle approach is problematic in terms of ensuring that the various EPA NPM Offices (OAR, OW, OLEM, and OECA) are coordinating with one another. This document should recommend that states and EPA work jointly to align the next NEI cycle starting in 2020 with a 4-year (2020-2023) period with the FY 2020-2021 NPM Guidance cycle. Through the NEPPS-Partnership & Performance workgroup, states and EPA worked during the lead-up to the FY18-19 guidance to preserve a two-year NPM cycle rather than revert to a single-year process, despite the uncertainty and changes surrounding EPA's budget in FY18 and beyond; the same can happen with a 4-year NEI approach.	ECOS

OW FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
Safe Drinking Water Section 3: Implementation of Drinking Water Standards/Regulations/ Health Advisories and Technical Assistance	States have expressed a need to provide early, ongoing coordination between EPA-HQ, EPA Regions and states on the following rules: i. Revised Total Coliform Rule (RTCR) ii. Lead and Copper rule (LCR)	ECOS
Safe Drinking Water Section 4: Implementation of Drinking Water Standards/Regulations/ Health Advisories and Technical Assistance	States have expressed a need for states and EPA to work in partnership on public messaging about Emerging Contaminants and Health Advisories, and assessing the impacts of these issues on the remediation programs.	ECOS
Safe Drinking Water Section 8: Safe Drinking Water Information Systems	OW lists for #1 it will "continue to develop" SDWIS Prime. States are working with EPA to develop this shared service rather than planning to build their own databases. ECOS encourages OW, working with OEI, to make timely progress to complete and deploy this system. States further encourage OW to consider use of the Exchange Network for publishing SDWIS Prime to facilitate state use as appropriate. States would like EPA to support SDWIS longer than 1 year, if transitions prove difficult.	ECOS
Water Quality Section 2: Water Infrastructure Finance and Innovation Act (WIFIA) Program	As EPA begins to approve early loan guarantees under the WIFIA program, states want to reiterate that effective engagement and coordination during this early stage are critical. This coordination may consist of ensuring flexibility in the application of innovative	ECOS

Issue Area	Comment	Commenter(s)
	financing models and coordination between the WIFIA and SRF programs. ECOS is appreciative of EPA's intention to support states seeking innovative financing through a finance center and clearinghouse.	
Water Quality Section 4: Nutrient Reduction Partnership	States have expressed a need for EPA to continue to allow states to use flexible approaches to addressing nutrient reduction that can lead to speedier, more cost effective paths to restoration and protection of our waters. It is important that the shared focus be on the environmental outcome.	ECOS
Appendix A	ECOS is appreciative of EPA-OW's efforts to continually improve their performance measurement practices. ECOS hopes that OW will encourage EPA regional staff to coordinate closely with state partners on transition issues related to new, revised, and discontinued measures.	ECOS

NEPPS FY 2018-2019 NPM Guidance External Comments

Issue Area	Comment	Commenter(s)
Key Programmatic Activity 1; Action 1	ECOS appreciates EPA's encouragement to regional staff to "proactively reach out to states and tribes to discuss the value and benefits of PPAs and PPGs as tools for implementing Performance Partnership principles." Since according to an OCIR study only 41% of eligible funds were being awarded under a PPG in 2016, there may be additional opportunities to work with states who wish to voluntarily increase awareness and utilization of PPA's and PPG's.	ECOS
Key Programmatic Activity 1; Action 4-5	ECOS agrees with EPA's support for regional staff to share business process modernization projects or activities currently proposed or underway using the E-Enterprise shared governance model, and to use Lean principles and methods to improve the effectiveness and efficiency of the NEPPS system. ECOS suggests that these sections include an encouragement for regional staff to take advantage of the resources and transference projects of the EPA Lean Action Board (LAB) in their joint Business Process Improvement efforts with states and to seek to have a dialogue with states in their regions about priority areas for streamlining and adoption of completed streamlining recommendations.	ECOS