Message

From: Dunn, Alexandra [dunn.alexandra@epa.gov]
Sent: 2/4/2019 1:30:00 AM
To: Ross, David P [ross.davidp@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]
CC: Dunlap, David [dunlap.david@epa.gov]; Bodine, Susan [bodine.susan@epa.gov]; Mclain, Jennifer [Mclain.Jennifer@epa.gov]; Wehrum, Bill [Wehrum.Bill@epa.gov]; Bolen, Brittany [bolen.brittany@epa.gov]; Wright, Peter [wright.peter@epa.gov]; Leopold, Matt (OGC) [Leopold.Matt@epa.gov]; Breen, Barry [Breen.Barry@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Burneson, Eric [Burneson.Eric@epa.gov]; Forsgren, Lee [Forsgren.Lee@epa.gov]; Kramer, Jessica L. [kramer.jessical@epa.gov]; Konkus, John [konkus.john@epa.gov]; Drinkard, Andrea [Drinkard.Andrea@epa.gov]
Subject: RE: PFAS Action Plan - Revised Draft per Interagency Comments
Attachments: PFAS Action Plan_02.2.19 DraftClean.docx spb-ddd-nbb-add edits.docx

Here are my comments added. A few spots to smooth out largely in the beginning and then it goes much more smoothly. So much hard work reflected in this document. Kudos to all who have put hours into it.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

-----Original Message-----
From: Ross, David P
Sent: Sunday, February 3, 2019 7:42 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>
Cc: Dunlap, David <dunlap.david@epa.gov>; Bodine, Susan <bodine.susan@epa.gov>; Mclain, Jennifer <Mclain.Jennifer@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany <bolen.brittany@epa.gov>; Wright, Peter <wright.peter@epa.gov>; Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Breen, Barry <Breen.Barry@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>; Burneson, Eric <Burneson.Eric@epa.gov>; Forsgren, Lee <Forsgren.Lee@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>; Konkus, John <konkus.john@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: Re: PFAS Action Plan - Revised Draft per Interagency Comments

Thanks Nancy.

Sent from my iPad

> On Feb 3, 2019, at 5:19 PM, Beck, Nancy <Beck.Nancy@epa.gov> wrote:
>
> A few additional edits in the attached.
> Dave -I agree that some of the good language the team developed is not captured in the TOC. My guess is this is a finesse to get closer to where OMB wanted us to be. Seems like there was some trading-off going on.
> In the attached I've suggested a subheader to capture the TSCA work in section IV.
>
> Thanks,
> Nancy
>
>
> **********
> Nancy B. Beck, Ph.D., DABT
> Principal Deputy Assistant Administrator Office of Chemical Safety and
> Pollution Prevention
> P: 202-564-1273
> beck.nancy@epa.gov
>
>
> -----Original Message-----
> From: Ross, David P
> Sent: Sunday, February 3, 2019 1:04 PM
> To: Dunlap, David <dunlap.david@epa.gov>
> Cc: Bodine, Susan <bodine.susan@epa.gov>; Mclain, Jennifer
> <Mclain.Jennifer@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Dunn,
> Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany
> <bolen.brittany@epa.gov>; Wright, Peter <wright.peter@epa.gov>;

> Leopold, Matt (OGC) <Leopold.Matt@epa.gov>; Breen, Barry
> <Breen.Barry@epa.gov>; Starfield, Lawrence
> <Starfield.Lawrence@epa.gov>; Burneson, Eric <Burneson.Eric@epa.gov>;
> Forsgren, Lee <Forsgren.Lee@epa.gov>; Beck, Nancy
> <Beck.Nancy@epa.gov>; Kramer, Jessica L. <kramer.jessical@epa.gov>;
> Konkus, John <konkus.john@epa.gov>; Drinkard, Andrea
> <Drinkard.Andrea@epa.gov>
> Subject: Re: PFAS Action Plan - Revised Draft per Interagency Comments
>
> Deliberative; Confidential; Do Not Release
>
> All,
>
> I'm currently on iPad right now and can't pick up the redlines in Word, so I apologize if you've already covered this overall question and comment:
>
> I know we are adhering to AAW's outline, but I think I few important elements in the plan get lost in the layout of table of contents, which may undermine some of our important messaging. Should we consider the following tweaks:
>
> IV. Change title from question to "....: What EPA is doing to....". Also, is there a way we can create another subsection in this section? It is fairly long and makes it seem by reading the TOC that we only talk about understanding PFAS in commerce, not what we are doing about it, which the section heading currently suggests we are doing. Can we create a few shorter sections, and specifically call out TSCA in a subsection heading so it shows up in the table of contents.
>
> VI. Same as section IV. Change title to "....: What EPA is doing to...."
>
> VII. The title says long term, but the content says we are moving forward with the hazardous substance listing now (i.e., starting in the short term even if we finish in the long term), and the research section has both short and long term discussions. In other words, the title to the section undersells the content of the section.
>
> I'd move the hazardous waste listing section to the precision section, and put it in or near the currently really (and too) short "Tools for Addressing PFAS" section. Maybe make it "Hazardous Waste Listing and other Tools for Addressing." And no where in the table of contents do we actually mention enforcement, which is supposed to be a key focus of our efforts in the short term. So do we need to add the term "Enforcement" somewhere in the TOC, again probably right in this area?
>
> Then, I'd make Section VII about the Research strategy, which currently starts on page 29. Again, I'd drop the reference to long term in the section heading because the strategy discussed here is both short and long term. I'd also add a cross reference in this section to the other science based, research sections discussed earlier (like the tox discussion starting on page 19, etc). We don't want readers to inaccurately believe this section contains our entire research strategy.
>
> Happy to discuss these, but what I'm suggesting involves very light editing to improve messaging more than modifying actual content.
>
> Dave
>
> Sent from my iPad
>
>> On Feb 3, 2019, at 10:45 AM, Dunlap, David <dunlap.david@epa.gov> wrote:
>>
>> I have suggested some edits, which I added to Susan's (attached).
>>
>> DDD
>>
>> David D. Dunlap
>> O - 202.564.4941
>>
>> From: Bodine, Susan
>> Sent: Saturday, February 2, 2019 6:21 PM
>> To: Mclain, Jennifer <Mclain.Jennifer@epa.gov>; Ross, David P
>> <ross.davidp@epa.gov>; Wehrum, Bill <Wehrum.Bill@epa.gov>; Dunn,
>> Alexandra <dunn.alexandra@epa.gov>; Bolen, Brittany
>> <bolen.brittany@epa.gov>; Dunlap, David <dunlap.david@epa.gov>;
>> Wright, Peter <wright.peter@epa.gov>; Leopold, Matt (OGC)
>> <Leopold.Matt@epa.gov>; Breen, Barry <Breen.Barry@epa.gov>;
>> Starfield, Lawrence <Starfield.Lawrence@epa.gov>
>> Subject: RE: PFAS Action Plan - Revised Draft per Interagency
>> Comments
>>
>> I had a few small edits (attached).
>>
>> Susan
>>
>> From: Mclain, Jennifer

>> Sent: Saturday, February 2, 2019 2:19 PM
>> To: Ross, David P <ross.davidp@epa.gov<mailto:ross.davidp@epa.gov>>;
>> Wehrum, Bill <Wehrum.Bill@epa.gov<mailto:Wehrum.Bill@epa.gov>>;
>> Bodine, Susan <bodine.susan@epa.gov<mailto:bodine.susan@epa.gov>>;
>> Dunn, Alexandra
>> <dunn.alexandra@epa.gov<mailto:dunn.alexandra@epa.gov>>; Bolen,
>> Brittany <bolen.brittany@epa.gov<mailto:bolen.brittany@epa.gov>>;
>> Dunlap, David <dunlap.david@epa.gov<mailto:dunlap.david@epa.gov>>;
>> Wright, Peter <wright.peter@epa.gov<mailto:wright.peter@epa.gov>>;
>> Leopold, Matt (OGC)
>> <Leopold.Matt@epa.gov<mailto:Leopold.Matt@epa.gov>>; Breen, Barry
>> <Breen.Barry@epa.gov<mailto:Breen.Barry@epa.gov>>; Lopez, Peter
>> <lopez.peter@epa.gov<mailto:lopez.peter@epa.gov>>; Servidio, Cosmo
>> <servidio.cosmo@epa.gov<mailto:servidio.cosmo@epa.gov>>; Stepp, Cathy
>> <stepp.cathy@epa.gov<mailto:stepp.cathy@epa.gov>>; Idsal, Anne
>> <idsal.anne@epa.gov<mailto:idsal.anne@epa.gov>>; Benevento, Douglas
>> <benevento.douglas@epa.gov<mailto:benevento.douglas@epa.gov>>;
>> Stoker, Michael B.
>> <stoker.michael@epa.gov<mailto:stoker.michael@epa.gov>>;
>> Gulliford, Jim <gulliford.jim@epa.gov<mailto:gulliford.jim@epa.gov>>;
>> Hladick, Christopher
>> <hladick.christopher@epa.gov<mailto:hladick.christopher@epa.gov>>;
>> Szaro, Deb <Szaro.Deb@epa.gov<mailto:Szaro.Deb@epa.gov>>; Mugdan,
>> Walter <Mugdan.Walter@epa.gov<mailto:Mugdan.Walter@epa.gov>>;
>> Rodrigues, Cecil
>> <rodrigues.cecil@epa.gov<mailto:rodrigues.cecil@epa.gov>>; Walker,
>> Mary <walker.mary@epa.gov<mailto:walker.mary@epa.gov>>; Newton,
>> Cheryl <Newton.Cheryl@epa.gov<mailto:Newton.Cheryl@epa.gov>>; Gray,
>> David <gray.david@epa.gov<mailto:gray.david@epa.gov>>; Chu, Ed
>> <Chu.Ed@epa.gov<mailto:Chu.Ed@epa.gov>>; Thomas, Deb
>> <thomas.debrah@epa.gov<mailto:thomas.debrah@epa.gov>>; Jordan,
>> Deborah <Jordan.Deborah@epa.gov<mailto:Jordan.Deborah@epa.gov>>;
>> Pirzadeh, Michelle
>> <Pirzadeh.Michelle@epa.gov<mailto:Pirzadeh.Michelle@epa.gov>>;
>> Thiede, Kurt <thiede.kurt@epa.gov<mailto:thiede.kurt@epa.gov>>;
>> Orme-Zavaleta, Jennifer
>> <Orme-Zavaleta.Jennifer@epa.gov<mailto:Orme-Zavaleta.Jennifer@epa.gov
>> >
>>>
>> Subject: PFAS Action Plan - Revised Draft per Interagency Comments
>>
>> Internal/Deliberative/Close hold
>>
>> Hello,
>>
>> Attached is the revised EPA PFAS Action Plan. Many thanks to all of your staffs for their significant input during the development of the Plan and particularly for their very quick turn-around of edits in response to interagency comments. This is for your awareness and any final revisions by Monday morning. Note that we will be working in parallel to clean-up and re-format the document so you do not need to focus on those details.
>>
>> Many thanks to the OGWDW staff that have diligently worked to edit and collate revisions to this document. Our goal is to provide the revised plan and the comment response documents to OMB by late Monday. The OP has already set up initial OMB discussions for Tuesday (OMB only) and Wednesday (interagency partners). Please let me know if you would like to review the comment response documents and I will send separately.
>>
>> Best,
>> Jennifer
>>
>>
>>
>> Jennifer L McLain
>> Acting Director
>> Office of Ground Water and Drinking Water U.S. EPA
>> 202-564-4029
>>
>> <PFAS Action Plan_02.2.19 DraftClean.docx spb-ddd edits.docx>
> <PFAS Action Plan_02.2.19 DraftClean.docx spb-ddd-nbb edits.docx>