



THE ADMINISTRATOR OF THE ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC 23 2015

Peter S. Thorne, Ph.D.
Chairman
Science Advisory Board
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Dr. Thorne:

I want to thank you and all Science Advisory Board members for your October 22, 2015, letter that provided the results of the board's consideration of the supporting science for the U.S. Environmental Protection Agency's planned actions listed in the Spring 2015 Unified (Regulatory) Agenda and Plan.

While the SAB concluded that it would not undertake review of the science supporting any of the actions in the spring agenda, it did identify two topics to emphasize opportunities to apply previously provided SAB advice and recommendations: the integrated planning model used to project air emissions from electric-generating units and the need to transition to greener chemicals, processes and technologies.

With respect to the first topic, I would like to thank the SAB for recognizing the EPA's efforts to improve its modeling efforts using the integrated planning model. We are committed to increasing the transparency and comparability of the integrated planning model through continued expert engagement in the activities the SAB has highlighted, including comparative modeling efforts with the Eastern Regional Technical Advisory Committee, Stanford University's Energy Modeling Forum and similar groups. The agency will continue to work to improve our use of the integrated planning model through our own efforts, and we anticipate that our efforts will continue to be informed by review, comment and contributions from independent modeling experts as well as members of the public. For example, we have been involved with the Energy Modeling Forum for the past 15 years and have conducted extensive integrated-planning-model modeling to support its efforts to compare outputs, methodologies, assumptions and data sources across multiple models; and we remain committed to this partnership with the Energy Modeling Forum. In addition to continuing our efforts to improve our tools and analyses, we also plan to further enhance transparency through regular website updates of our documentation of the integrated-planning-model applications. Please see www.epa.gov/airmarkets/power-sector-modeling.

I want to comment on the SAB review of the supporting science for the two rules under development in the Office of Chemical Safety and Pollution Prevention: Trichloroethylene, Rulemaking Under TSCA Section 6(a); and N-Methylpyrrolidone and Methylene Chloride, Rulemaking Under TSCA Section 6(a). Specifically, the SAB noted that options for alternatives were extensively discussed in the TCE materials but not in the NMP and methylene chloride materials. During the SAB review the Office of Chemical Safety and Pollution Prevention explained that alternatives and risk-reduction options are developed only for individual chemicals after a risk assessment is completed and only if the risk assessment indicates that the chemical poses risks to humans or the environment. The difference in the availability

of alternatives information is, therefore, directly related to the completion date for the risk assessment for each chemical as well as progress on subsequent work. TCE's risk assessment was completed in June 2014, and subsequent risk-reduction efforts began in July 2014. The risk assessments for methylene chloride and NMP were completed in August 2014 and March 2015, and, therefore, risk-reduction efforts did not begin until 2015. TSCA section 6 requires the agency to find that a chemical presents or will present an unreasonable risk of injury to health or the environment and to take action to adequately protect against the unreasonable risk using the least burdensome requirements. A proposed rule, as the SAB noted in its letter, would describe the preferred risk-reduction approach and explain how the approach achieves adequate protection using the least burdensome requirements. As part of that description, the agency would characterize the likely alternative chemicals or processes that current producers and users of the regulated chemical could turn to as a result of the proposed risk-reduction approach and based on market information. This information also would be included in any discussion of the costs and benefits of the selected risk-reduction option that would be presented in the proposed rule. The public would have an opportunity to review and comment on the information considered and on the proposed rule as part of the regulatory process.

I would also like to thank the SAB for recognizing the EPA's efforts encouraging safer chemicals and greener processes and technologies and for the advice and recommendation from the SAB and the Board of Scientific Counselors that noted the EPA must be prepared to address related questions in the context of the agency's Strategic Research Action Plans and the six major research program areas (EPA-SAB-15-004) and the TSCA evaluations to identify risk-management alternatives that include safer chemicals and greener processes and technologies. In addition to these activities, OCSPP also leads or is actively involved in many of the EPA nonregulatory efforts to encourage safer chemicals and related greener processes and technologies. These programs encourage consumers to purchase greener products; leverage consumers' buying power to stimulate market demand for greener products and services; set standards for federal purchasing of greener products and services; and provide technical assistance to and recognition of manufacturers that design, make or use greener products, processes and technologies. The following are a few examples of OCSPP nonregulatory programs that advance safer chemicals and greener processes and technologies:

- EPA's Green Chemistry program (www2.epa.gov/greenchemistry) encourages the design of chemical products and processes that reduce or eliminate the generation of hazardous substances.
- The Presidential Green Chemistry Challenge Awards promote the environmental and economic benefits of developing and using novel green chemistry.
- EPA's Safer Choice program (www2.epa.gov/saferchoice) helps consumers, businesses and purchasers find products that perform well and are safer for human health and the environment. Safer Choice Program participants are continually driving innovation to make chemical products safer. Our program currently labels more than 2,000 products used by consumers, institutions and industry that meet our Safer Choice Standard.
- The E3: Economy, Energy and Environment Program (www2.epa.gov/e3) is a federal technical assistance framework helping communities, manufacturers and manufacturing supply chains adapt and thrive in today's green economy. The EPA and five other federal agencies have pooled resources to support small- and medium-sized manufacturers with customized assessments. E3 is helping communities across the nation reduce pollution and energy use while increasing profits and creating new job opportunities.
- The Drift Reduction Technology Program (www2.epa.gov/reducing-pesticide-drift) encourages the manufacture, marketing and use of spray technologies scientifically verified to significantly reduce pesticide drift. The program's initial focus is on spray technologies used primarily for pesticide applications to row and field crops by ground or aerial application equipment. We hope to expand it to include technologies for orchard and vineyard crops.

We appreciate your acknowledging that the information the EPA provided has improved as compared to past SAB review opportunities. As always, we are grateful for the board's work to support the EPA's scientific activities, and we look forward to continuing to work with you. In the meantime, if you have any questions, please contact Laura Vaught, acting associate administrator for the Office of Policy, at (202) 564-0304 or vaught.laura@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Gina McCarthy". The signature is fluid and cursive, with a large initial "G" and a long, sweeping underline.

Gina McCarthy