



National Tribal Toxics Council

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September 2, 2016

Kimberly Chavez and Michele McKeever
USEPA Office of Enforcement and Compliance Assurance

National Tribal Toxics Council Early Tribal Input on OECA FY 18 – 19 NPM Guidance

The National Tribal Toxics Council (NTTC, or Council) appreciates the opportunity to provide early input on the FY 18-19 National Program Manager Guidance for EPA's Office of Environmental Compliance and Assurance. Reducing exposure to toxic chemicals for tribal members is a priority for the NTTC and we fully support the allocation of resources for TSCA Programs that limit the release of contaminants into the environment.

This topic is gravely important to the Council, recognizing that the NPM Guidance gives direction and sets priorities for EPA regions and authorized tribes and states implementing EPA programs. However the timing of this request did not provide opportunity for the Council to research and discuss it adequately. Therefore, it will be discussed at the upcoming NTTC In-Person Meeting October 25-27, after which the NTTC will provide further comments in detail.

Until then, attached are a copy of the July 31, 2014 NTTC comment letter and attachment which were provided to the Office of Compliance during the period for early comment on the FY 2016-2017 OECA NPM Guidance. They are enclosed for your consideration as OECA begins drafting the FY 18-19 NPM Guidance. The identified concerns continue to be important to the Council and to tribes across the country because either the concern is not fully resolved, or the topic may need to be re-addressed after the recent amendments to TSCA.

The Council looks forward to continuing the dialogue with OECA on the NPM Guidance in the coming year. Until then, you may contact the Council via Dianne Barton, NTTC Chair, at bard@critfc.org.

Sincerely,

Kristin K'eit, NTTC Coordinator
For the National Tribal Toxics Council