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October 31, 2017

VIA ELECTRONIC MAIL

Vivian Daub, Director, Planning Division
Office of Planning, Analysis, and Accountability, Office of the Chief Financial Officer
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20036

Re.: NOPA's Comments on Draft FY 2018-2022 EPA Strategic Plan (82 Fed. Reg. 46,490)
(Docket ID No. EPA-HQ-OA-2017-0533)

Dear Ms. Daub:

The National Oilseed Processors Association (NOPA) appreciates the opportunity to submit comments on the Draft FY 2018-2022 EPA Strategic Plan (82 Fed. Reg. 46,490, October 5, 2017).

The National Oilseed Processors Association (NOPA) is a national trade association that represents 13 companies engaged in the production of food, feed, and renewable fuels from oilseeds, including soybeans. NOPA's member companies process more than 1.8 billion bushels of oilseeds annually at 65 plants located in 21 states throughout the country. NOPA member company facilities range in size from small, family-owned businesses to large multi-national corporations.

NOPA encourages the efficient production of an abundant, safe, sustainable, and high-quality supply of oilseeds and oilseed products for domestic and world consumers of food, feed ingredients, and renewable fuels.

The Draft FY 2018-2022 EPA Strategic Plan (Plan) outlines EPA's goals for the next four years. NOPA supports EPA's focus on the three goals it identified in the Plan, particularly the core mission to deliver real results to provide Americans with clean air, land, and water. Our detailed thoughts are below, grouped under each of the three goals.

Goal 1 – Core Mission

NOPA concurs with EPA's assessment that emerging measurement and information technologies are shifting the paradigm for air quality data. Such technologies can quickly assess situations and provide needed information. However, we caution that EPA should ensure that data provided by nontraditional sources and outside companies be robust and verified, particularly if used in enforcement decisions.

Goal 2 – Cooperative Federalism

NOPA encourages EPA to work closely with states on the issues of compliance assurance and enforcement. EPA should be focused on achieving environmental protection while also respecting the needs of individual communities and economic growth. As EPA continues its work on E-Enterprise, it should look to provide certainty to regulated entities, while at the same time moving towards efficiency and transparency in compliance assurance. This can best be accomplished by engaging all stakeholders to ensure needs are met across the spectrum. In addition, NOPA supports EPA's efforts

to pilot new approaches to tailoring state transactional oversight actions in order to streamline the processes.

Goal 3 – Rule of Law and Process

NOPA agrees with EPA's statement that one of its highest priorities must be to create consistency and certainty for the regulated community. We support the development of a catalog of responsibilities that require EPA's attention as required by statute as well as a mapping of the processes associated with legal obligations. Many times, EPA appears to be rushing towards a mandatory legal deadline without having conducted a robust rulemaking that allows for meaningful stakeholder engagement.

NOPA also strongly supports EPA's commitment to speeding up approvals of permits and modifications to create certainty for the business community. Oilseed processing facilities that have recently undergone a permitting process have varied experiences, with some permit approval processes dragging on for years.

In conclusion, NOPA is encouraged by EPA's direction and focus for the next four years. Thank you in advance for your consideration of NOPA's comments. If you have any questions, or would like to further discuss our comments, please contact me at lgershman@nopa.org or 202-864-4368.

Sincerely,



Lorraine Krupa Gershman, P.E.
Vice President, Regulatory Affairs