



U.S. Environmental Protection Agency

**ACTION PLAN TO INTEGRATE
ENVIRONMENTAL JUSTICE**

**THE OFFICE OF PREVENTION,
PESTICIDES, AND TOXIC SUBSTANCES
ENVIRONMENTAL JUSTICE ACTION PLAN
2004-2005**

The Office of Prevention, Pesticides, and Toxic Substances Environmental Justice Policy

The Office of Prevention, Pesticides, and Toxic Substances' (OPPTS) programs are designed to protect human health and the environment by identifying, assessing, and reducing the risks presented by the thousands of chemicals on which our society and economy have come to depend. These include pesticides used to meet national and global demands for food and the industrial and commercial chemicals found in products and throughout our homes and workplaces. In managing these risks, OPPTS directs its efforts toward the greatest threats, including those found in populations and communities that may be disproportionately impacted by the health or environmental threats. For example, EPA is developing a coordinated approach to the Agency's activities, training, guidance, and outreach to all school systems, including tribal, private, state, urban and rural schools. Thus, OPPTS is committed to promoting and supporting environmental justice (EJ) principles, as they are already incorporated in the way we do business.

OPPTS will demonstrate its commitment by further incorporating EJ into all of our activities, policies, and programs. By incorporating EJ in all program areas, we will adhere to the Agency's mission and Executive Order 12898. Further, this Action Plan is written in response to the goals outlined in the Administrator's August 9, 2001 Memorandum, entitled "EPA's Commitment to Environmental Justice," and guidance provided by the Office of Environmental Justice. OPPTS' overall goal is to achieve EJ by decreasing the burden of environmental risk to all communities by promoting pollution prevention, safer chemicals, and reduced chemical exposure risks.

OPPTS staff and management will consider EJ as a meaningful, integral part of our programs and decisions. OPPTS plans to provide training to employees and expects them to have a basic working knowledge of what EJ is and how they can incorporate the principles into their daily work. Also, from a programmatic approach, OPPTS considers issues of EJ as it relates to education and outreach, regulatory activities, data management, contracts and grants, communication, and planning.

OPPTS highly encourages staff to participate in the Fundamentals of Environmental Justice workshop sponsored by EPA's Office of Environmental Justice. Therefore, as staff decide how to design a new program or to implement existing programs, they will be equipped with the basic knowledge and skill to integrate EJ principles into the process. Another approach to ensure that EJ principles are implemented in the most prominent activities is to incorporate specific objectives and activities into the various OPPTS divisional work plans, as well as, negotiating EJ practices into staff annual performance agreements, as appropriate. OPPTS management believes this is an effective way to ensure that EJ is being appropriately addressed.

OPPTS is committed to ensuring good public participation processes. Staff and management are expected to provide the opportunity for stakeholder groups that may be affected by our programs to have an opportunity for early, frequent and meaningful involvement in the

decision-making process. OPPTS fosters strong partnerships and is committed to ensuring productive public participation by its stakeholders. Collaborative efforts to promote the advancement of understanding and progress on EJ issues are also encouraged. Staff is urged to provide effective outreach to communities that may be affected by our regulations, policies and guidance.

Staff and management are expected to act proactively and make every effort to identify areas where minority and/or low-income populations are being, or have the potential of becoming, disproportionately exposed to environmental risks. In those instances where prevention could not be achieved, it is OPPTS' policy to take appropriate steps, within the appropriate statute, to make a concerted effort to minimize and/or eliminate unreasonable environmental risks.

The Office of Prevention, Pesticides and Toxic Substances Environmental Justice Action Plan

The Office of Prevention, Pesticides and Toxic Substances (OPPTS) Environmental Justice Action Plan is designed to promote, support and integrate EJ into existing and new program activities, including education and outreach, regulatory activities, data management, enforcement, contracts and grants, communication, and planning. Specifically, this plan will summarize OPPTS' process for implementing its EJ policy in the following areas:

- Section 1: Management Accountability**
- Section 2: Operational Resources**
- Section 3: Program Support**
- Section 4: Government Performance and Results Act Alignment (GPRA)**
- Section 5: Internal Organizational Engagement**
- Section 6: External Stakeholder Engagement**
- Section 7: Data Collection, Management and Evaluation**
- Section 8: Professional and Organizational Development**
- Section 9: Environmental Justice Assessment**
- Section 10: Program Evaluation**

Appendix A: FY04-05 OPPTS Environmental Justice Performance Measures

Section 1: Management Accountability

- **How will your organizational structure promote the integration of environmental justice within all program areas?**
- **How will your office's management communicate expectations about the Environmental Justice Program, review tangible/intangible outcomes, and evaluate performance?**

The Office of Prevention, Pesticides and Toxic Substances (OPPTS) consists of three major program areas: The Office of Pesticide Programs (OPP); The Office of Pollution Prevention and Toxics (OPPT); and The Office of Science Coordination and Policy (OSCP). To ensure that the Office's approach to integrating EJ into its three program areas is consistent and coordinated, OPPTS has formed an EJ Team that consists of a lead OPPTS EJ coordinator, who oversees the flow of communication about EJ activities across the Office, and designated EJ coordinators and liaisons from each of its program offices. Supported by EJ network representatives from each Division, EJ coordinators and liaisons have been charged with the task of promoting integration of EJ into day-to-day activities by providing EJ guidance, advice, training, and support to managers and staff in their respective offices.

The need to consider potential issues or concerns of EJ in all program activities will be articulated to staff and management in OPPTS through a formal training course on EJ principles. The course will be endorsed by senior management and participation will be strongly encouraged. OPPTS' goal is to train at least 25% of its staff over the next two years. Further, the EJ Team will work with management in each Division to identify ongoing and/or new EJ-related projects for inclusion in the OPPTS EJ Action Plan. OPPTS will evaluate on a semi-annual basis the progress of each project listed in the Action Plan. An annual progress report will be drafted to show our performance and to assess expected outcomes.

To affirm our commitment to EJ, OPPTS management has developed the Environmental Justice Coordinating Council (EJCC). The EJCC is a committee whose mission is to provide cogent and practical recommendations to the Assistant Administrator (AA)/Deputy Assistant Administrator (DAA) on how OPPTS can continue to make progress in incorporating EJ into the daily working operations of each office's activities. The EJCC will also be instrumental in developing EJ guidance for OPPTS and recommending implementation strategies for the OPPTS EJ Action Plan that will institutionalize EJ into all programs areas. A detailed description of the functions and responsibilities of this body will be presented in Section 2 of this plan.

Section 2: Operational Resources

- **Identify the aggregate full-time equivalents (FTE) in your office that will specifically focus on environmental justice issues. If responsibilities and duties are parceled out as collateral duties to one or more employees, please compute what the FTE equivalent would be.**
- **What are the functions and day-to-day responsibilities of your environmental justice**

coordinator(s) and/or teams?

There are 18.0 full-time equivalents (FTEs) in OPPTS that specifically or partially work on EJ-related issues. All of these FTEs are performing EJ-related work as a collateral duty, including members of the EJ team.

As mentioned in the previous section, OPPTS management has affirmed its commitment to EJ by forming and participating on the EJCC. The EJCC is led by the Deputy Assistant Administrator (DAA) and is comprised of Deputy Office Directors, some members of the EJ Team, and designated staff from across OPPTS. The EJCC was created to ensure that EJ is rooted into all of OPPTS' programs and policies and is charged with the responsibility of providing guidance and recommendations on how OPPTS can accomplish this goal. Convening on a quarterly basis, the EJCC is responsible for the following tasks:

- Provide advice and recommendations to the Assistant Administrator/Deputy Assistant Administrator on how to continue to make progress in incorporating EJ into OPPTS' programs and policies.
- Develop and/or review proposed policy documents, strategic plans, etc. involving EJ and provide advice and recommendation.
- Develop recommendations on how to integrate EJ priorities systematically into programs, policies and activities.
- Review resources needs (e.g. budget and staffing) to meet EJ objectives.
- Evaluate methods to strengthen and improve EJ integration and provide recommendations.

The major task of the EJ Team is to promote the integration of EJ into the daily operations of each office by providing guidance, advice, training, and support to managers and staff. Specifically, the EJ team will perform the following tasks:

- Develop, implement and utilize strategies or guidance to integrate EJ into the daily working operations of each office (i.e., EJ Action plans, ELI report, NAPA report, NEPA EJ guidance, etc.).
- Provide advice and recommendations to senior management regarding resource needs (e.g., budget and staffing) to meet EJ objectives.
- Provide guidance to the management and staff of their respective offices on how to integrate EJ into their programmatic areas.
- Develop and maintain an EJ activity inventory.
- Participate in and, where appropriate, provide ongoing EJ Training and offer input on how to make the training more program specific and relevant to the office.
- Provide technical support and training to other offices and/or federal agencies, upon request.
- Disseminate information to staff on EJ-related activities.
- Develop a monitoring and evaluation program for tracking project commitments and measuring success as part of the implementation plan.
- Identify gaps or weaknesses related to EJ issues in rules, regulations and policies and develop recommendations for addressing those gaps or weaknesses.

- Develop an ongoing mechanism to share EJ information within the program offices and identify stakeholders who could benefit from increased awareness.
- Identify, quantify, and evaluate methods to strengthen and/or improve the EJ program.

In addition to members of the EJ Team, each Program Office will have an EJ network representative in each Division trained to serve as a lead staff contact for information sharing and project development.

Further, OPPTS will continue its representation on the National Environmental Justice Advisory Council's Health and Research Subcommittee. One member of the EJ Team serves as the Designated Federal Official (DFO) for the National Environmental Justice Advisory Council's Health and Research Subcommittee. In this capacity, the DFO ensures that the subcommittee receives the programmatic support from all offices regarding their research agenda. In turn, the subcommittee provides advice and recommendations to OPPTS regarding how to more effectively incorporate EJ in its daily activities (e.g., cumulative risk, risk reduction, outreach and communication and pollution prevention).

Section 3: Program Support

- **Does your office have any ongoing mechanisms for focusing on environmental justice issues, such as teams and workgroups? If yes, please list and describe. Also, state how these mechanisms will be tied to other programs and activities in your office.**
- **Are there any specific program/initiatives for which environmental justice will be listed as a funding priority?**

As already mentioned, OPPTS is the umbrella office for three separate offices (i.e. OPP, OPPT, and OSCP). Each of its program offices is actively involved in addressing EJ issues and has incorporated, or is planning to incorporate, elements of EJ in many of its current programs and activities. Below is a description of some of the ongoing and future EJ activities of OPPTS and its supporting offices.

3a. Office of Prevention, Pesticides and Toxic Substances (OPPTS)

Environmental Justice Coordinating Council (EJCC) - To assist in its effort to integrate EJ into its program, policies, and procedures, OPPTS has formed the EJCC. The EJCC is charged with the task of providing advice and recommendation to the Assistant Administrator and the Deputy Assistant Administrator on how OPPTS can integrate EJ into its daily operations. The specific duties of the EJCC are outlined in Section 2.

OPPTS EJ Team - The OPPTS EJ Team is primarily responsible for promoting the integration of EJ into the daily operations of each office by providing guidance, advice, training, and support to managers and staff. Each program office has representation on the EJ Team to ensure that OPPTS' approach to integrating EJ is consistent and coordinated. The specific duties of the EJ Team are outlined in Section 2.

OPPTS Draft Tribal Strategic Plan - Recognizing that Tribes face many EJ- related issues, OPPTS has drafted a tribal strategic plan to address the environmental concerns faced within Indian country. The purpose of the OPPTS "Tribal Specific" Strategic Plan is to help determine how to best use our resources to foster health and environmental gains in Indian Country. The OPPTS Tribal Strategic Plan will serve as a guide for EPA Managers in our program areas as they work with the Tribes to develop and implement initiatives to support successful pesticide, chemical and pollution prevention programs.

OPPTS is proposing four goals for Indian country over the next few years (fiscal years 2003-2008): 1) Improve the government-to-government relationship between OPPTS and federally recognized tribes through effective and meaningful consultation, communication, coordination and outreach; 2) Improve tribal capacity for program development and implementation; 3) Foster toxics, pesticides and pollution prevention program coverage in Indian Country; and 4) Help Tribes assess and manage risk associated with traditional tribal ways of life and protect public health and the environment in Indian country. Several projects and activities are already planned, or underway, to support attainment of these goals.

As part of an overall effort to increase awareness of toxics, pollution prevention and pesticide issues in tribal communities, OPPT and OPP collaborate to produce the quarterly OPPTS Tribal Newsletter. The OPPTS Tribal Newsletter offers various information on a variety of topics regarding OPPTS environmental programs, and includes a variety of news articles and information from the Tribes and Tribal organizations themselves. OPPTS utilize this two-way communication to ensure timely information flow between EPA and tribal governments, leaders and environmental organizations. This publication has grown in readership and recognition from our Tribal partners and continues to enjoy a wide distribution in Indian Country and at EPA. OPPTS will continue to produce quarterly issues of the newsletter, post them on-line, and mail to all federally recognized tribes. OPPT will also be developing an Agency-wide Pilot Tribal newsletter project.

OPPT, in collaboration with other program offices, is working to increase tribal capacity to assess environmental health threats from toxic chemicals in traditional foods through the OPPTS Tribal Subsistence Project. OPPT works with tribes to enable them to conduct their own exposure/risk assessments based upon the unique circumstances associated with their cultural beliefs, religions, and lifestyles. In the next year, OPPT will convene a meeting with other program offices, tribal leaders and environmental managers to begin the development of the next phase of the Tribal Subsistence Project.

Further, in a continued effort to identify other national toxic and pollution prevention issues of significant concern to tribal populations, OPPT will work in close partnership with Tribal Affairs Project members of the Forum on State and Tribal Toxics Action (FOSTTA). FOSTTA provides a forum for regular exchange between EPA, States, and Tribes to discuss tribal, pollution prevention, and chemical issues. The Tribal Affairs Project provides opportunities for tribes to provide EPA with valuable program expertise from the tribal perspective and vice versa. In addition, regular meetings between Tribal and pollution prevention/chemical groups provide a mechanism for ongoing exchange between State and Tribal representatives. OPPT will host monthly conference

calls and participate in at least three face-to-face meetings over the next year.

A federal advisory committee established by OPPT is exploring areas of interest for Tribes in OPPT's chemicals management and prevention programs, as part of an overall effort to provide EPA with formal consensus advice and recommendations on policy areas across OPPT's programs. The FACA, known as the National Pollution Prevention and Toxics Advisory Committee (NPPTAC), includes Tribal representation. The NPPTAC recently formed a Tribal Workgroup where issues and options for further collaboration are being explored for potential consideration by the full NPPTAC.

To build state and tribal pollution prevention capacity, OPPT will also utilize a cooperative agreement with the National Pollution Prevention Roundtable (NPPR) to implement a two-year (FY 2003-2005) collaborative effort between states and tribes to work on pollution prevention initiatives. OPPT will establish a states and tribal pollution prevention discussion group to identify opportunities for pollution prevention collaboration. The discussion group will establish a workplan over monthly conference calls and will meet at the annual FOSTTA meeting. Some of the goals for the discussion group include the formation of at least three new "Mentoring Partnerships" with states and tribes to work collectively on local and regional pollution prevention capacity building and the creation of a database of regional tribal pollution prevention efforts and needs utilizing the Pollution Prevention Results centers and FOSTTA for information gathering. OPPT will also assess the need for a new policy for reducing grant match requirements mandated in the Pollution Prevention Act of 1990 to a lower percentage (from 50% to 25% or lower) to increase the number of pollution prevention projects going to tribes.

Like OPPT, OPP works closely with tribal groups to obtain tribal perspectives on pesticide issues of significant concern. OPP meets on a regular basis with the Tribal Pesticide Program Council (TPCC) to identify national and regional pesticide issues that are specific to Indian Country. OPP also facilitates cooperative activities between the state organization, the State FIFRA Issues Research and Evaluation Group (SFIREG), and TPCC to encourage the development of common solutions for mutual pesticide related concerns. OPP will continue to ensure that tribes are appropriately brought into stakeholder discussions and that information on EPA projects, programs, emerging issues and grant opportunities is disseminated.

In 2002, OPP initiated an effort to determine the feasibility and usefulness of modifying state-of-the-art "LifeLine" software (a tool OPP is already using in its pesticide exposure/risk assessment and tolerance setting processes) to enable it to capture unusual exposure pathways that may accompany the practice of tribal traditional ways of life. OPP is now working very closely with a consortium of Native villages in Alaska, and with the Blackfeet Nation in Montana, to develop software modules that will accurately model their two unique living situations. Site visits have been conducted, information sources have been identified, data have been gathered, and now new computer code is being written. After the approval of the two modeled groups is granted, the new software will be made generally available. If the new software proves to be useful to the modeled tribal groups and to EPA, and if other tribes indicate an interest in partnering with us to have similar models built, OPP will consider the feasibility of modeling additional tribal living scenarios in other

biogeographical sections of the country.

To build tribal capacity to assess environmental threats from pesticides, OPP provides grants to tribes for targeted pesticide-related “field projects” such as surface to water quality management, endangered species protection, integrated pest management, and pesticide assessment, education, and outreach. For each of the past eight years, OPP’s competitive Tribal Pesticide and Water Quality Grant Program has provided approximately \$450,000 per year in direct funding to tribes. OPP will again in FY 04 award 10-11 grants up to \$50,000 each to tribes to address pesticide issues specific to their communities. Additionally, OPP will continue to conduct water quality and pesticide management workshops for various tribal groups. Hosted by tribes throughout the country, these ongoing workshops bring a wide variety of pesticide related expertise to Indian country. Participants often include tribal expert, staff from local agricultural extension services, state and local environmental agencies and others. Tailored agendas emphasize pesticide issues impacting local tribes.

In addition to financial and educational support, OPP also provides analytical support to tribes by analyzing soil and animal samples for toxic pollutants that may pose a potential health risk to tribal communities. Over the next year, OPP will analyze at least 30 samples of fish, soil, and/or moose and deer livers for persistent, bioaccumulative and toxic pollutants that may pose a risk to tribal communities. Specifically, the potential exposure levels to dioxins, furans and coplanar polychlorinated biphenyls (PCB) in samples will be determined.

OPPTS Managers and Staff Training on Environmental Justice - OPPTS is committed to supporting and promoting EJ. To ensure our goal is achieved, OPPTS will offer EJ training to its managers and staff who will be strongly encouraged to attend. OPPTS will train its managers in collaboration with the Office of Environmental Justice (an introductory EJ training session was provided to OPP managers in November 2003 and it was well received). OPPTS will identify a team of volunteers for training its staff. Each volunteer will participate in a Train-the-Trainer course to become familiar with training principles and the fundamentals of EJ. Volunteer EJ trainers will then train staff in classes of 30 to meet OPPTS’ goal for staff EJ training.

3b. Office of Pollution Prevention and Toxics (OPPT)

Community Air Screening How To Manual and Tools - OPPT, in collaboration with the Agency for Toxic Substances, and Disease Registry and the Office of Air, has developed and will publish a Community Air Screening How To Manual designed to help communities prioritize and take effective action to reduce risks from air toxics. The How To Manual will be made available via OPPT’s Community Assistance Home Page, which provides information on chemicals and their effects, tools to help understand and use environmental data, and programs and potential solutions to concerns about chemicals. This manual directly responds to the National Environmental Justice Advisory Council recommendations to the Agency on the development of a collaborative multi-media model for pollution prevention in a community setting.

To support OPPT’s continued effort to identify EJ issues, OPPT will utilize its preexisting

risk screening, priority setting, and exposure assessment tools to support EJ hazard, exposure, and risk reduction activities. For example, the Risk Screening Environmental Indicators (RSEI) supports a wide variety of activities at various government levels from national to community. In particular, it may be used to identify EJ problem areas, rank relative risks for priority action, and map geospatial relationships of risk-related chemical releases to populations of interest. This tool could also be used to address these relationships for tribal populations and other ethnic groups. The RSEI tool combines population demographics, exposure estimates, and measures of toxicity to provide relative risk-related screening analyses. The Exposure, Fate Assessment Screening Tool (E-FAST) is another tool that provides screening level assessments of consumer, general population, and environmental exposures for use in a risk assessment context. The Geographical Exposure Modeling System (GEMS) will provide detailed assessments of general population and environmental exposures for air, soil, surface water, and ground water releases.

OPPT and Michigan Technological University Peace Corps Masters Fellowship Program- Within the next year, OPPT will form a partnership with Michigan Technological University to launch a Peace Corps Masters Fellowship Program focusing on EJ issues. Each year, one to three returned Peace Corps volunteers enrolled in Michigan Technological Environmental Policy Masters Program will complete their final year of a 2-year program at EPA working on environmental issues that affect minority and/or low-income communities.

EPA's Roadmap for Addressing Mercury Exposure: A Short-term Action Plan - OPPT is working with Regions, states, tribes, stakeholders, and the community to reduce mercury use, release, and exposure. OPPT is coordinating EPA's actions to reduce health risks from mercury exposure. EPA fully understands that health threats from mercury exposure are of critical importance for a number of special populations most at risk. Of particular concern are pregnant women, young children, indigenous communities and other cultural groups who routinely consume large amounts of fish. Beginning in early 2004, OPPT will hold meetings with states, tribes, and the public to solicit input on the better management of mercury. New risk communication tools for educating subpopulations of greater risk (i.e., subsistence fishers) will be developed. OPPT has specifically targeted the tribal community this year by enrolling the Indian Health Service as a champion of the Hospitals for Healthy Environment Program, which is a program that encourages hospitals to eventually eliminate mercury use and minimize production of hazardous waste. OPPT will form new Pollution Prevention Partnerships (P2) with industry and the private sector to encourage reduced mercury use and release.

OPPT Lead Program - OPPT is working with Regions, states, tribes, stakeholders, and the community to reduce the risk of exposure to lead. Recognizing that lead poisoning is most prevalent in poorly-maintained older housing, which is often occupied by poor, people-of-color and their children living in inner city areas, much of OPPT's effort to combat lead poisoning is geared towards reaching this population most at risk. The overall program goal is to decrease the number of children with elevated blood lead levels. EPA uses three general strategies to address EJ issues in the lead program 1) promote greater availability of lead risk identification and reduction, at lower cost; 2) empower parents and other caretakers to protect children directly through effective communication tools; and 3) encourage improved maintenance of low-income dwellings. Using

these strategies, OPPT will train and certify individuals and firms who use lead-based paint. OPPT will continue to provide educational materials to residents at the time of sale or lease on the risks of lead-based paint and develop a voluntary/regulatory training and education program on work practice standards to minimize release of lead dust from residential renovations. Additionally, through the Tribal Baseline Assessment and Outreach for Lead Project, OPPT will award 10-15 grants to tribes to increase awareness and knowledge about lead exposure in Indian Country.

3c. Office of Pesticide Programs

Review of pesticide registration/reregistration processes - Several Divisions within OPP will form EJ workgroups that will evaluate their respective Division's risk assessment processes for areas where EJ should be incorporated. In OPP's Special Review and Reregistration Division (SRRD), three pilot chemicals have already been selected for review of the reregistration process. As the pilot chemicals go through the reregistration process, EJ issues will be considered and addressed appropriately. Plans are already underway for EJ language to be included in the Federal Register Notice of Availability for risk assessments. In addition, stakeholders are currently being asked about the potential for increased exposure in subpopulations at their initial meetings with SRRD. Further, SRRD will develop and approve EJ questions for inclusion on an existing reregistration checklist for Chemical Review Managers (CRM). EJ guidance will also be developed for CRMs based on the results of the pilot.

Other OPP Divisions (Registration Division, Health Effects Division, and Antimicrobial Division) have committed to following similar steps as SRRD to assess their daily processes.

OPP EJ Brown Bag Sessions - In collaboration with the Office of Environmental Justice, OPP will offer to its managers and staff one hour brown bag sessions on EJ. The purpose of the sessions is to provide a brief overview of EJ and to initiate the thought process for identifying EJ issues. OPP plans to conduct at least six of these sessions with the hope of generating more interest for the EJ fundamental course that will be offered to all of OPPTS.

OPP EJ Small Grants Program - To enhance communities' capacity building efforts on pesticide-related issues, OPP will establish an EJ Small Grants Program in FY04-05. The OPP EJ Small Grants Program will award small grants to at least one community-based organization per Region to conduct outreach and communication projects on pesticide safety. The goal of the EJ Small Grants Program is to reduce pesticide exposure risk and to promote safe pesticide use in communities that may be disproportionately impacted by pesticide exposure.

Worker Protection Standard Improvements - OPP has established a Hazard Communications (HazComm) Workgroup to consider the necessary steps required to establish a national hazard communication program that will more effectively train farmworkers on pesticide safety. OPP's goal is to improve the availability of pesticide safety training materials in languages and symbols familiar to farmworkers. In 2003, the HazComm workgroup completed phase I of the project by drafting a pilot/study proposal for developing new hazard communication materials. The next step (phase II) is to share the proposal with the regulated/protected community and the general public

for comment and further refinement. During this phase, the workgroup will also compile and review existing research and literature pertinent to the complex implementation of such a program and the regulatory issues involved. OPP will prepare a communications document to summarize findings and conclusions from the research and literature review, and final decisions regarding plans for conducting hazard communication pilots/studies. In FY04-05, OPP will award grants and/or contracts to fund pilots/studies for initial implementation.

Since 1995, OPP has provided funding for several research and education programs designed to evaluate and convey pesticide safety information to farmworkers. Since 2000, OPP funded a cooperative agreement that trained full-time educators to teach agricultural workers and their families how to reduce the risks from pesticide hazards. Through this program nearly 350,000 farmworkers, farmworker families, and community members have been trained about how to reduce risks from pesticide hazards. The National Pesticide Education Program for Agricultural Workers and Farmworker Children researched and evaluated methods for delivering pesticide safety to a predominately non-English speaking, low-literacy, migrant population. The program developed a curriculum on pesticide safety and established a program on pesticide safety for agricultural workers, their families, and community members. The program trained between 50 to 70 educators yearly about pesticide safety, and education and outreach techniques. OPP will form a new cooperative agreement with a nonprofit organization to continue training farmworkers on pesticide safety issues.

Hispanic Radio Network - OPP has partnered with the Self-Reliance Foundation to air radio spots on the Hispanic Radio Network. OPP will develop and air at least 15 radio spots on pesticide-related issues on the radio station in an effort to increase public health awareness and education on pesticide-related issues, including health and safety, for the Spanish speaking community.

Integrated Pest Management (IPM) in Urban and Rural Schools - OPP will continue to work with urban and rural school districts to reduce the use of pesticides in the learning environment. OPP will implement new IPM program will be implemented in schools in several states including, the District of Columbia, Alabama, Texas, New Mexico, and Oklahoma. The goal is to reduce pesticide use in schools by educating officials about pesticides exposure risks to children.

Section 4: Government Performance and Results Act Alignment (GPRA)

- **How will your Regional/Headquarters office's environmental justice program be linked to your Regional/Headquarters office's main GPRA priorities?**
- **How will your Regional/Headquarters office's environmental justice strategies and activities be integrated into specific programmatic areas/functions? (e.g., permitting, community outreach, etc.)**
- **Will your Regional/Headquarters office utilize Performance Partnership Agreements (PPAs) and Performance Partnership Grants (PPGs) to specifically address environmental justice issues? If yes, please list and describe.**

Many of OPPTS environmental justice activities are directly aligned with our Office's main

GPRA priorities, which include preventing pollution and reducing risks in communities, homes, workplaces, and ecosystems. For example, consistent with our GPRA priority to significantly reduce the incidence of childhood lead poisoning, and as part of this year's EJ Action Plan, OPPTS Lead Program will develop a voluntary/regulatory training and education program on work practice standards to minimize release of lead dust from residential renovations, provide educational materials on risks of lead-based paint to home buyers, and work with Tribes to collect lead exposure data for community education. In addition, OPPTS will support its GPRA goal to reduce the risks associated with PCBs, mercury, dioxin, and other toxic chemicals of national concern by analyzing samples of fish, soil, and moose and deer livers from tribal communities for persistent, bioaccumulative and toxic pollutants.

Further, OPPTS will conduct several EJ projects that fulfill our GPRA goal of reducing pesticide risks to workers, consumers, and ecosystems. For example, OPPTS will develop guidance for addressing EJ issues during the registration and reregistration processes in an effort to improve its risk assessment process for subpopulations. OPPTS will also develop additional educational materials to more effectively train farmworkers and their families on pesticide safety, display pesticide safety messages on targeted public transportation, and air radio spots on pesticide-related issues on the Hispanic Radio Network.

A key objective of OPPTS' main GPRA goal is assessing environmental conditions on tribal lands to identify need for action. OPPTS has several new and ongoing projects that are assisting us in achieving this objective, including the award of grants directly to tribes. OPPTS plans to increase its number of pollution prevention projects in tribal communities by reducing its grant match requirements from 50% to 25% or lower. Additionally, OPPTS will continue to provide competed tribal grants for targeted pesticide-related field projects. OPPTS will also work with tribal leaders and community members to develop the next phases of the OPPTS Tribal Subsistence and LifeLine Projects.

Section 5: Engagement

- **Will your Regional/Headquarters office's environmental justice program have any ongoing mechanisms to communicate with, receive input from, and otherwise consistently engage with other programs in your Regional/Headquarters office? If yes, please list and describe.**
- **Will your Regional/Headquarters office develop any related guidance to the staff regarding the integration of environmental justice in areas such as authorization/delegation, environmental education, grants and contracts, inspection, enforcement and compliance assistance, permitting, performance partnership, public participation, waste site cleanup/brownfields, etc.? If yes, please list and describe.**

As described previously, OPPTS has formed an EJ Team that consists of representatives from all three of its program offices. To this end, the EJ Team serves as the key mechanism for communicating EJ information to and from program offices. Members of the EJ Team actively

participate in regularly scheduled meetings with other Headquarters and Regional EJ Coordinators to discuss national policy issues as well as local/regional EJ issues and activities. In addition, as a member of EPA's EJ Executive Committee, OPPTS' DAA frequently engages in meetings with other DAA's and regional directors to share, review, and discuss EJ activities, policies, and issues. The information gathered from such meetings is passed on to the EJ Team to ensure that OPPTS' approach to integrating EJ into policies and programs is consistent with Agency policy and direction. OPPTS will continue this approach for communicating with its program offices, as well as establish new cross-divisional EJ teams within each program office to fully engage other staff members.

Further, OPPTS will establish a workgroup to determine the feasibility of developing guidance for identifying and addressing EJ in daily operations of OPPTS. If found to be feasible, such guidance will outline criteria for considering EJ in daily work and highlight some program-specific examples where staff can readily identify areas of impact. Information and understanding on the guidance would be provided to all managers and staff.

Section 6: External Stakeholder Engagement

- **Will your Regional/Headquarters office have any processes in place to receive input on environmental justice issues from external stakeholders, such as workgroups, advisory bodies, or listening sessions? If yes, please describe the process and explain how the input gathered may be (or has been) used by your Regional/Headquarters office.**
- **Will your Regional/Headquarters office have any ongoing mechanisms to share information to external groups regarding environmental justice such as websites, faxback system, printed outreach materials, etc.? If yes, please list and describe. Also please mention the specific stakeholder group(s) which benefit from these outreach mechanisms.**
- **How will your Regional/Headquarters office identify stakeholders who could benefit from increased awareness about environmental justice and being more engaged in the collaborative problem-solving process?**
- **How will your Regional/Headquarters office promote collaborative problem-solving among stakeholders?**
- **Will your Regional/Headquarters office have any special initiatives or provisions to address issues for persons with limited English proficiency? If yes, please describe or attach.**
- **In the course of your environmental justice outreach, will your Regional/Headquarters office utilize any informational materials translated in languages other than English? If yes, please list and describe.**
- **Are there any specific grant programs for which environmental justice will be listed as a funding priority? Please list and describe.**

OPPTS uses public participation in its decision-making process. Outreach to all stakeholders

involved in the EJ dialogue (e.g., state, tribal, and local government; other federal agencies; community and grassroots groups; indigenous groups; business and industry; environmental groups and other non-governmental organizations; and academia) is a priority.

OPPTS will utilize its current communication processes to receive input on EJ issues from external stakeholders. OPPTS staff meets frequently with external stakeholders who may be affected by or who may have a vested interest in the rules and guidance the Office develops. This interaction with external stakeholders may take many forms including, but not limited to the following: (1) a meeting with industry or an environmental group, (2) a public hearing or public listening session, (3) through the public comment period required for all rulemaking, or (4) through parent committees and workgroups formed under the Federal Advisory Council Act (FACA). EJ communities are expected to be a part of these meetings as well as State and local governments that can communicate with these communities.

Further, OPPTS will also communicate EJ activities to external stakeholders through its websites, printed materials, brochures, tool kits, and public broadcast announcements. Much of the outreach material has been translated to Spanish. OPPTS continues to strive to translate materials into other languages.

As part of its overall goal for EJ, OPPTS will continue to identify stakeholders who could benefit from increased awareness about EJ and become more engaged in the collaborative problem-solving process. For example, OPPT's Lead program plans to include EJ as an agenda issue in the upcoming Division Director's meeting. This meeting has Regional and some state organization representatives. Also, OPPT is currently developing a risk assessment strategy and negotiating several Enforceable Consent Agreements (ECA) for Perfluoro-octanoic acid (PFOA). OPPT plans to consider mechanisms to inform EJ communities about public meetings and the outcome of these activities. OPPT also plans to consider various means to involve EJ communities in the process by partnering with Regions and States possibly by sponsoring an Annual National meeting that will include representatives from Regions and States to discuss EJ concerns and other issues.

OPPTS staff is actively involved with the National Environmental Justice Advisory Council (NEJAC). Specifically, staff collaborate with the Health and Research, Pollution Prevention and Indigenous Peoples Subcommittees. A number of OPPTS staff participate on the Subcommittee's monthly calls and provide technical expertise to help inform and educate the Subcommittee on the EJ related work being conducted in our Office. Staff are also present at the annual meetings of the NEJAC and provide support to the work being done at those meetings.

OPPT has established the National Pollution Prevention and Toxics Advisory Committee (NPPTAC or Committee) to obtain consensus recommendations from a balanced group of stakeholders, including environmental justice communities and our Tribal partners. The purpose of the NPPTAC, which includes Tribal representation, is to provide formal advice to EPA on OPPT's chemicals management and pollution prevention program. A Tribal Workgroup has been formed by the Committee to explore issues and options for further collaboration between OPPTS and Tribes for potential consideration by the NPPTAC.

OPPTS is sensitive to the public health and environmental concerns of tribal communities. OPPTS is actively involved with the Forum on State and Tribal Toxics Action (FOSTTA) Tribal Affairs Project. This initiative is a mechanism for tribes to provide EPA with valuable program expertise from the tribal perspective. Tribal representation on this project comes from a variety of environmental and health officials. Funding is also provided to tribal entities, such as the Tribal Pesticide Program Council, that focuses attention on pesticide issues and concerns. OPPTS currently has several grant programs exclusively for Native American Tribes, including grant programs for lead assessment and education and grants for targeted, pesticide-related field projects, such as water quality management and endangered species protection.

OPP has instituted the Committee to Advise on Reassessment and Transition (CARAT) and the Pesticide Program Dialogue Committee (PPDC) to more effectively and efficiently gather input from stakeholders. Both groups include representation from farm workers advocacy groups, public health organizations and tribal governments. OPP routinely confers with groups through workshops, meetings, other forms of communications and has received valuable input on its programs. Pesticides issues and decisions are electronically communicated to interested parties from a centralized mailing list, including those identified by the People of Color Environmental Groups Directory, a compendium of ethnically diverse groups with an interest in the environment and public health.

OPPTS does consider opportunities to incorporate EJ as a funding priority for grant activity. OPPTS's tribal grant gave some preference to the inclusion of addressing EJ needs as a priority. OPPTS continues to consider EJ issues when developing grant proposals. OPPTS plans to review the PBT grants to determine if it is appropriate to include EJ as a priority component. In addition, OPP is establishing an EJ Small Grant Program to focus awards to community-based organizations for outreach projects on pesticide safety.

In addition to the activities listed above, OPPTS works with a wide variety of other public national organizations that have extensive regional and local networks and share mutual goals with the program such as the protection of public health and establishment of local efforts to stimulate public action through media and grassroots efforts. OPPTS supports national organizations with extensive regional and local networks to help establish local environmental justice outreach programs. OPPTS meets regularly with these groups in order to help create new opportunities to achieve significant risk reduction. Funding is provided to cooperative partners to support the development of new tools for building community based programs that are flexible enough to be responsive to the needs of residents in local communities. Some examples of funded activities include the following:

- Hispanic Radio Network - Spanish radio spots on pesticide-related issues
- American Association of Poison Control Centers - Encourage parents and care givers to keep pesticides and household chemicals locked away from children.
- Washington, DC Metro Transit System - Display of pesticide safety information
- National Environmental Education and Training Foundation - Educate health care providers on recognition and management of pesticide health-related conditions.

- Indian Health Service - Participation in reducing mercury use and exposure.
- Americorps - Train farmworkers on pesticide safety.
- ECOS - Environmental Council of States
- National Tribal Environmental Council
- National Pesticide Medical Monitoring Program - provide clinical and basic toxicological pesticide information and services to the public.
- National Pesticide Information Center - provide real time science-based information on pesticides.

OPPTS will continue to engage stakeholders and the public as it proceed with the integration of EJ into its program, policies, and activities.

Section 7: Data Collection, Management and Evaluation

- **List your Regional/Headquarters office's main data sets - the ways in which you collect environmental justice information. Also, describe how this information will be utilized by your Regional/Headquarters office (e.g., environmental justice assessment, program tracking/evaluation, etc.).**
- **Will your Regional/Headquarters office have a method of identifying and highlighting best practices and lessons learned? If yes, please describe.**

OPPTS currently does not have a formal way of collecting EJ information. However, the EJ team will research methods for collecting such information and recommend to upper management the best approach for doing so. The goal of a formal data collection method will be to allow storage of information about OPPTS EJ-related activities in one comprehensive easily accessible location.

To highlight best practices, OPPTS will continue to fulfill the Agency's requirements for the annual EJ Progress Report and EJ Biennial Report. In addition, the EJ team will devise a communication strategy for sharing success stories throughout the Agency and with the public. The EJ team will also do internal midyear and annual assessments of EJ activities to identify areas of strengths and weaknesses and lessons learned. The findings from the assessments will be shared with EJCC for advice and recommendation.

Section 8: Professional and Organizational Development

- **Will your Regional/Headquarters office plan to provide training on environmental justice? If yes, please list and describe.**
- **What methods will you utilize to promote shared learning, such as best practices and lessons learned among staff? If yes, please list and describe.**

OPPTS is committed to training staff and enhancing the working knowledge of EJ. To that end, OPPTS is currently developing an office wide EJ training program. OPPTS is formulating a process where programmatic specific issues could be incorporated into an

overarching EJ training program. As one aspect of this approach, OPPTS has obtained the services of an intern to prepare a training “needs assessment” document to assist trainers to tailor the training activities appropriately. For example, it is imperative that OPPTS training cover real case scenarios and explore proactive measures to communicate with communities that disproportionately share the burden of environmental risk. This assessment will be performed by participation from the branch managers and senior staff of OPPTS. Once that assessment has been performed, OPPTS will commence a process to “train the trainer” to approximately 15 staff persons to ultimately prepare and conduct office wide training. To be sure, the programmatic specific training will correspond to existing EJ training developed by the Office of Environmental Justice, as well as, the EJ Training Collaborative.

One of the methods used to promote shared learning, such as best practices and lessons learned, is by sharing the methods developed by OPPTS EJ training with the Office of Environmental Justice and the EJ Training Collaborative. In addition, as program staff interact on a frequent basis with their respective colleagues, the opportunity increases for shared learning of actual working experience.

Section 9: Environmental Justice Assessment

- **Will your Regional/Headquarters office have a process by which an environmental justice assessment will be conducted? If yes, please describe.**
- **Will your Regional/Headquarters office rely on any information resources with which to conduct an environmental justice assessment, such as the Environmental Justice Mapper, Environmental Justice Toolkit, etc.? If yes, please list and describe.**

For many years, OPPTS has been implementing programs, policies, and activities that address environmental issues in the community. OPPTS will review its current processes for assessing and responding to community environmental issues to determine if there is a need to establish guidance for conducting an EJ assessment. Strengths and weaknesses of existing processes, ways to improve upon these processes, and necessary steps to move forward to ensure that EJ issues are adequately addressed in our daily operations will be ascertained.

Section 10: Program Evaluation

- **Will your regional/Headquarters office have any performance measures specifically related to environmental justice? If yes, please describe.**
- C **Will your Regional/Headquarters office conduct any needs assessments, reports or other documents (produced internally or through a contract) to identify, quantify, and evaluate methods to strengthen and/or improve your environmental justice program? If yes, please list and describe.**
- C **How will your Region/Headquarters highlight the accomplishments and results from your Environmental Justice Action Plan?**

The OPPTS EJ Team is responsible for tracking and reporting the progress of the items outlined in the EJ Action Plan, and determining other measures for evaluating the larger concepts of organizational culture change and institutionalization of EJ principles. The EJ Team will develop a list of both quantifiable and qualifiable measures to assess these goals. Baseline data will be collected to evaluate the extent to which OPPTS has achieved the goals. Examples of some of the measures may include resources allocated to EJ-related activities and accomplishments, number of staff trained in EJ, number and nature of EJ inventory activities. If OPPTS management determines that sufficient progress for incorporating EJ is not being made in a timely manner, a determination will be made on how to strengthen or improve the Office's performance. OPPTS will highlight its accomplishments and results from the EJ Action plan in its annual Progress report and biennial EJ report. The EJ Team will also determine the feasibility of a quarterly EJ newsletter.

Appendix A: FY 04-05 OPPTS Environmental Justice Performance Measures

Outlined in Appendix A are OPPTS' EJ Performance Measures for FY 04-05. Projects are listed under six main objectives and the activity, output, and outcome for each project are described. In addition, the performance measures matrix lists the number of FTEs, dollar amount required for implementation/continuation of each activity, and a lead contact for each project.

Appendix A
OPPTS Environmental Justice Performance Measures
FY 2004-2005

Objective 1. *Risk Reduction / Protect Environmental and/or Public Health* - To ensure equal implementation of environmental laws to achieve significant risk reduction which will improve the environment and/or public health of affected communities.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>OPPT will work with Regions, states, tribes, stakeholders, and the community to reduce mercury use, release, and exposure.</p>	<p>1. OPPT will continue to coordinate EPA actions to reduce mercury uses, releases, and exposure.</p> <p>2. OPPT will hold at least two meetings with states, tribes, and the public to solicit input on the better management of mercury.</p> <p>3. OPPT will form Pollution Prevention Partnerships to reduce mercury use by industry and the private sector.</p> <p>4. OPPT will develop new risk communication tools for educating different populations on the risk of mercury exposure.</p> <p>5. By 2004, OPPT will enroll the Indian Health Service as a champion of the Hospitals for a Healthy Program to help them reduce exposure to mercury and other PBT chemicals and to minimize waste in all of their clinics.</p>	<p>1. One product of this coordination will manifest in the production of “EPA’s Roadmap for Addressing Mercury Exposure: A Short-term Action Plan,” which is scheduled to be published in late 2004.</p> <p>2. The dialogue and information obtain during these meetings will be incorporated, to the extent possible, into “EPA’s Roadmap for Addressing Mercury Exposure: A Short-term Action Plan,” which is scheduled to be published in late 2004.</p> <p>3. Two new partnerships will be started by 1 July 2004.</p> <p>4. A communication strategy will be developed in 2004 to increased public awareness on mercury risks from non-dietary sources and knowledge on purchase, use, and safe disposal of mercury containing products.</p> <p>5. Regions 5 and 9 are collaborating with OPPT on this effort. A meeting with the IHS will be held by June 2004, with the expectation of signing them on as a champion by Sep 2004.</p> <p>.</p>	<p>1. 1.0 FTE /\$130K</p> <p>2. 0.1 FTE/\$100K</p> <p>3. 0.2 FTE/\$25K</p> <p>4. 0.3 FTE/50K</p> <p>5. Presidential Management Intern (salary paid by Region 9).</p>	<p>1. Denise Wright (NPCD)</p> <p>2. Denise Wright (NPCD)</p> <p>3. Tom Murray (PPD)</p> <p>4. Ellie Clark (NPCD)</p> <p>5. Piper Stege (PPD)</p>

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>OPPT will work with States, Territories, Tribes, and environmental justice communities to reduce the risk of exposure to lead.</p>	<p>1. Train and certify individuals to conduct lead-based paint activities; certify firms conducting those activities, and accredit training providers.</p> <p>2. Provide and disseminate an educational brochure that specifically addresses the potential risks form renovation and remodeling projects. Make brochure available from the National Lead Information Center and post an electronic verison on our website.</p> <p>3. Develop a voluntary recognition program promoting the use of lead-safe work practices for contractors who conduct renovation activities in older homes.</p> <p>4. Tribal Baseline Assessment and Outreach for Lead - Work in collaboration with Tribes, so that they can collect lead exposure data and educate parents on lead poisoning.</p>	<p>1.Over the next two years, the certification program will train at least 2000 individuals, 350 firms and 100 training providers.</p> <p>2. Amend 40 CFR part 745, Subpart E, to require contractors to distribute the renovation brochure when performing renovation activities in pre-1978 housing.</p> <p>3. By 2005, develop mechanisms to promote the use of lead-safe work practices in order to reduce or eliminate lead hazards created by renovation in homes with lead paint.</p> <p>4. Starting in 2004, award grants on an annual basis to at least 10-15 Tribes to increase Tribal awareness of the dangers of lead.</p>	<p>1. 1 FTE</p> <p>2. 1 FTE</p> <p>3. 1 FTE</p> <p>4. 1 FTE/1.4M</p>	<p>1. Joel Wolf (NPCD) and Robert Wright (NPCD)</p> <p>2. Cindy Wheeler (NPCD) and John Wilkins (NPCD)</p> <p>3. Mike Wilson, NPCD</p> <p>4. Darlene Watford (NPCD)</p>
<p>OPPT will assist EJ communities in assessing and prioritizing risks from air toxics</p>	<p>By June 2005, OPPT will publish the Community Air Screening How to Manual and make it available on OPPT's Community Assistance Home Page.</p>	<p>Build communities capacity for better risk based priority setting and allow measurable risk reduction in communities</p>	<p>0.2 FTE</p>	<p>Hank Topper (EETD)</p>

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPPT will develop materials in support and training to Regions and States using the How-to-Manual for EJ communities.	By June 2005, OPPT will host two workshops for Regions and States on how to utilize the Community Air Screening How to Manual.	Improved capacity of EJ communities to understand and improve local air quality.	0.2 FTE/\$67K	Hank Topper (EETD)
OPP will review its risk assessment process to determine areas where EJ considerations can be incorporated during the registration and reregistration processes.	By September 2005, four OPP Divisions (SRRD, AD, RD, and HED) will assess their risk assessment process and draft guidance for addressing EJ issues.	OPP will change its risk assessment process in at least four Divisions to ensure that subpopulations are adequately considered during the registration and/or reregistration of pesticides.	<ol style="list-style-type: none"> 1. 0.1 FTE 2. 0.1 FTE 3. 0.1 FTE 4. 0.1 FTE 	<ol style="list-style-type: none"> 1. Cleo Pizana (AD) 2. Dirk Helder (SRRD) 3. Linda Arrington (RD) 4. Bill Wooge (HED)
OPP will work with Regional offices to implement Integrated Pest Management (IPM) in urban and rural school districts across the nation.	By June 2005, IPM will be implemented in school districts in the District of Columbia, Alabama, Texas, New Mexico, and Oklahoma.	Pesticide application usage in these school districts will decrease at least 90% and costs for pesticide application will reduce dramatically; school officials will be educated and made aware of the principles of IPM.	0.1 FTE/ \$80K	Sherry Glick (BPPD)
OPP will develop a module for the Tribal LifeLine Software	<p>By December 2004, OPP will develop software modules that will model pesticide and chemical risk exposures for practitioners of traditional cultural ways of life in two biogeographical areas of the country, building on software already used by OPP for general population.</p> <p>By August 2005, OPP will evaluate the benefits of extending the effort to tribes in other parts of the country. Depending on outcome and resources, OPP will fund and expand project.</p>	Improve the ability of both EPA and tribes to evaluate the scope and magnitude of human pesticide exposure risks in Indian country	0.2 FTE/276K	Karen Rudek (FEAD)

Objective 2. Outreach and Communication - To provide opportunities for meaningful involvement and ensure effective communication between the Agency decisionmakers and stakeholders, including all affected communities.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPPT will facilitate communication on OPPT programs with EJ communities using Community Assistance Home Page	In FY 04-05, OPPT will continue to regularly post information to the Community Assistance Home Page to keep EJ communities current on OPPT programs.	Improved community access to OPPT resources and tools.	0.2 FTE/\$15K	Hank Topper (EETD)
OPPT will form a partnership with Michigan Technological University to launch a Peace Corps Masters Fellowship Program that focus on EJ issues.	By June 2005, OPPT will employ at least one returned Peace Corps volunteers enrolled in the Michigan Tech's Environmental Policy Masters Program to work specifically on environmental issues that affect minority or underprivileged communities.	Increased number of environmental professionals trained in and working on environmental issues related to minority and underprivileged communities.	0.05 FTE/\$40-120K	Chris Kent (PPD)
OPP will finalize proposal for new farmworkers hazard communication materials (HazComm) and will award grant/contract to implement pilot studies.	By June 2005, OPP will solicit and review public comments on proposed hazard communication project; complete communication document that summarizes findings/ conclusions from research and literature review activities; make final decisions regarding plan for conducting HazComm pilots/studies; and award of grants and/or contracts to fund HazComm pilots/studies	Better information about the needs of the farmworker and agricultural community; better understanding of the complex issues affecting implementation of a HazComm program for pesticides; greater consensus among the regulated/ protected community regarding the approach for a national HazComm program; and a better overall plan for eventual regulatory change and program improvement that will lead to a reduction in the risk to pesticide workers in agriculture.	0.5 FTE/\$100K	Richard Pont (FEAD)
OPP will display pesticide safety messages on targeted DC metro trains accessible to minority communities.	By August 2004, OPP will display pesticide safety messages on 500 DC metro buses, the interior of metro trains and at least 10 train platforms.	Increased public health awareness and education of urban communities on pesticide safety.	0.2 FTE/\$52K	Ronald Jackson (FEAD)

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPP will form a collaborative partnership with a nonprofit organization to improve pesticide safety training for farmworkers and their families.	By June 2005, OPP will establish a new cooperative agreement with a nonprofit organization to increase the number of farmworkers and families trained on pesticide safety.	At least 25, 000 new farmworkers will be trained on pesticide safety in workplace within a year.	0.05 FTE/\$100K	Carol Parker (FEAD)
OPP will air radio spots on pesticide-related issues on the Hispanic Radio Network.	By June 2005, OPP will work with Hispanic Radio Network to develop and air 15 radio spots on pesticide-related issues.	Increased public health awareness and education on pesticide-related issues, including health and safety, for the Spanish speaking communities.	0.1 FTE/ \$25K	Carol Parker (FEAD)
OPP will continue a national campaign (Lock It Up Campaign) to encourage parents and caregivers to keep pesticides and household chemicals locked away from children.	By June 2004, OPP, in partnership with the American Association of Poison Control Centers, will distribute 25,000 posters to all state poison centers and 4,000 posters to DC, MD, VA, PA and Chicago WIC centers. The message will also be displayed on Washington, DC Metro trains and buses.	Increased education among parents, grandparents, and child caregivers on how to prevent child-related pesticide poisonings by storing pesticides and other chemicals out of children's reach.	0.1 FTE/ \$9K	Chris Gillis (FEAD)

Objective 3. EJ Training and Resources - To provide training and/or resources for EPA managers and staff to enable them to incorporate environmental justice considerations into their decisionmaking process.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>OPPTS will provide an EJ Fundamental Training Course for managers.</p> <p>OPPTS will provide an EJ train-the-trainer course for staff employees.</p> <p>OPPTS will provide EJ training for the OPPTS community.</p>	<p>By July 2005, at least 50 % of OPPTS managers will complete EJ training.</p> <p>By December 2004, at least 20 OPPTS staff employees will complete the EJ train-the-trainer course. who can take the lead on EJ training throughout OPPTS.</p> <p>By July 2005, at least 25% of OPPTS employees will complete EJ training.</p>	<p>OPPTS managers will be more educated on the principles of EJ and will begin to incorporate into daily operations.</p> <p>At least 20 OPPTS staff will be trained to teach the fundamentals of EJ course to others in OPPTS and thus well versed on the subject of EJ</p> <p>EJ awareness will be increased among OPPTS staff.</p>	<p>0.2 FTE</p> <p>0.2 FTE/18K</p> <p>0.1 FTE</p>	<p>Artensie Flowers (FEAD) Gary Carroll (NPCD)</p> <p>Artensie Flowers (FEAD) Gary Carroll (NPCD)</p> <p>Artensie Flowers (FEAD) Gary Carroll (NPCD)</p>
<p>OPPTS will consider the feasibility of developing EJ guidance for its managers and staff.</p>	<p>By June 2005, OPPTS will establish a workgroup to determine if guidance is needed to identify and address EJ in daily operations.</p>	<p>Status of OPPTS' efforts to incorporate EJ in daily activities.</p>	<p>0.5 FTE</p>	<p>OPPTS EJ Team</p>
<p>OPPTS will promote EJ in the work done by its Offices.</p>	<p>By June 2005, OPPTS will develop cross-divisional EJ teams to fully engage staff members across the offices.</p>	<p>Increased capacity for staff to incorporate EJ into ongoing activities.</p>	<p>0.5 FTE</p>	<p>OPPTS EJ Team</p>
<p>OPP will offer EJ awareness sessions to its staff.</p>	<p>By August 2005, OPP will offer at least six EJ Brown Bag sessions to its staff.</p>	<p>EJ awareness will be increased among OPP staff.</p>	<p>0.1 FTE</p>	<p>Artensie Flowers (FEAD)</p>

Objective 4. Federal, State, Tribal and Local Government Coordination - To ensure effective coordination across all levels of government to address the environmental and public health concerns of affected communities.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPPTS will finalize the OPPTS Tribal Strategic Plan.	By August 2004, the strategic plan will be finalized and posted to OPPTS website.	A detailed plan for protecting against pesticides, toxics, and pollution in Indian Country.	1 FTE	Caren Rothstein-Robinson
OPPT will work with tribes to identify environmental justice concerns related to toxics and pollution prevention.	<ol style="list-style-type: none"> 1. Develop the next phase of the OPPTS Tribal Subsistence Project through collaboration with other Program offices. 2. Participate in 3 meeting/year and monthly conference calls with Tribal Affairs Project members of FOSTTA to identify EJ concerns related to toxics and p2 programs. 3. Disseminate information to tribes on EPA EJ projects, program, emerging issues and grant opportunities through OPPTS Tribal News, conference calls, and meetings with tribal environmental managers, tribal governmental leaders, tribal organizations, and tribal consortums. 	<p>Improve the ability of Tribes to conduct contaminant exposure and risk assessments related to tribal traditional ways of life.</p> <p>Identification of national toxic and pollution prevention issues that are of significant concern to tribal populations.</p> <p>Ensure that Tribes are brought into stakeholder discussions of EJ issues and that tribal concerns are considered during OPPT's decision making process.</p>	<ol style="list-style-type: none"> 1. 0.8 FTE/ \$40K 2. 0.5 FTE/\$90K 3. 0.8FTE/\$68K 	<ol style="list-style-type: none"> 1. Phil Robinson Darlene Harrod Mary Lauterbach (EAD) 2. Darlene Harrod Mary Lauterbach (EAD) 3. Mary Lauterbach (EAD)

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPP will provide tailored water quality/pesticide management workshops in Indian country for tribal environmental managers and will develop and distribute supporting publications.	By September 2005, OPP will provide a total of three water quality/pesticide management workshops and will produce and distribute supporting outreach materials to the tribal communities.	OPP will support tribal development of increased and broadened in-house pesticide-related capacity.	0.15 FTE/\$185K	Karen Rudek (FEAD)
OPP will work closely with tribes to identify national pesticide issues that are of significant concern to tribal populations.	<p>By June 2005, OPP will hold at least two national meetings with the Tribal Pesticide Program Council (TPPC) members to clearly identify the pesticide related concerns of Indian country.</p> <p>OPP will continue the regularly scheduled in-house information sharing with all levels of OPP management</p> <p>OPP will continue to disseminate information on EPA projects, programs, emerging issues and grant opportunities that may affect and/or be of interest to pesticide program managers in Indian country.</p>	<p>Pesticide related concerns of Indian country will be clearly identified.</p> <p>EPA decision makers are aware of Indian country's pesticide related concerns, and take those concerns into consideration when making regulatory decisions.</p>	0.75FTE/\$192K	Karen Rudek (FEAD)
OPP will provide analytic support to tribal communities to assist these communities in identifying contaminants that may expose them to potential health risks.	By September 2005, analyze at least 30 samples of fish, soil and/or moose and deer livers for persistent, bioaccumulative and toxic pollutants that may pose a risk to tribal communities.	Potential exposure levels to dioxins, furans and coplanar PCBs in samples will be determined.	1.0 FTE	Joseph Ferrario (BEAD)

Objective 5. Grants and Contracts Administration - To promote effective and efficient management of all grants and contracts to ensure that the environmental and public health concerns of affected communities are addressed.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPPT will reduce grant match requirements mandated in the Pollution Prevention Act of 1990 make grants more accessible to tribes	OPPT will draft policy to reduce grant match requirements from 50% to 25% or lower in an effort to increase number of PPIS grants going to tribes.	Increased number of pollution prevention projects in tribal communities.	0.10 FTE	Beth Anderson (PPD)
OPP will provide competed small grants for projects on pesticide safety to community-based organizations.	By July 2005, award small grants to at least one community organization per Region to undertake projects that enhance their capacity building efforts.	Citizen will have greater participation in environmental projects that affect their communities; Lessons learned and best practices can be shared with other communities	0.1 FTE/ \$150K	Artensie Flowers (FEAD)
OPP will provide competed tribal grants for targeted, pesticide related "field projects" such as water quality management and endangered species protection.	By October 2004, award at least 10 grants for targeted pesticide related field projects.	OPP will support tribal development of increased and broadened in-house pesticide related capacity.	0.15 FTE/\$450K	Karen Rudek (FEAD)

Objective 6. Environmental Justice Assessment - To conduct an assessment of the environmental justice indicators within affected communities as part of the decisionmaking process.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
OPPTS will research methods and tools for conducting EJ assessments.	By August 2005, a workgroup will be formed to research best approach for conducting EJ assessments in OPPTS.	Improved response to community EJ complaints.	0.1 FTE	OPPTS EJ Team