**To:** Hale, Michelle[hale.michelle@epa.gov]
**Cc:** Jackson, Ryan[jackson.ryan@epa.gov]; Dravis, Samantha[dravis.samantha@epa.gov]; Bolen, Brittany[bolen.brittany@epa.gov]; Tom Geier[tgeier@mmm.com]; Paul Narog[pfnarog@mmm.com]; John Metzger[jfmetzger@mmm.com]
**From:** John Ostergren
**Sent:** Sat 7/1/2017 1:03:59 AM
**Subject:** 3M follow up – regulatory reform
3M EPA reg reform proposals_overview_6-20-17.pdf

Administrator Pruitt:

Thank you for the opportunity last week to discuss 3M's recommendations to support US EPA's regulatory reform efforts.

Attached is a 1-page summary outlining:

- Three opportunities for immediate policy and resource prioritization; and
- Four recommendations for significant regulatory reform and streamlining.

As discussed, our recommendations reflect 3M's dual commitment to environmental performance and growth. Our recommendations are intended to preserve and enhance environmental performance – while also meaningfully improving the US regulatory climate in support of US manufacturing agility and competitiveness. We can and must do both.

Please note that Paul Narog and John Metzger of my staff (cc'd here) are well versed on these topics and stand ready to provide further clarification and support. John has spoken with Samantha on the topic, and Paul and John both recently met with Brittany as well as EPA staff at RTP.

Thank you again – to you and your staff – for your time and consideration.

Best regards,

John Ostergren

**John D. Ostergren, JD, PhD** | EHS
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3M.com

# 3M Recommendations – Regulatory Reforms Supporting US Manufacturing

June 20, 2017

***Support US growth & manufacturing agility – while preserving & enhancing environmental performance***

## POLICY SUPPORT & RESOURCE PRIORITIZATION

1. **Streamline TSCA New Chemical Program Review (Section 5) Process**
   - Request – Continue efforts to restore clarity on information expected at time of requests, maximize use of modeling and analog data, minimize animal testing, and expedite decision timing.
   - EPA Contact - Jeff Morris & Wendy Cleland-Hamnett, Office of Chemical Safety & Pollution Prevention

2. **Re-energize Air Quality Flexible Permitting Program**
   - Request – Prioritize to re-energize and expand the issuance of flexible air quality permits by actively partnering with state permitting authorities. *See* 74 Fed. Reg. 51418 (Oct. 6, 2009).
   - EPA Contact – Anna Wood, Director, OAQPS Air Quality Policy Division (919-541-3604)

3. **Continue Hydrofluorocarbon (HFC) Status Change Rules Under SNAP**
   - Request – Continue implementing Significant New Alternatives Program (SNAP) HFC status change rules establishing fire suppression sector as a priority in the third status change proposal in 2017/2018 (consistent with comments previously submitted by 3M, Honeywell and others).
   - EPA Contacts – Cindy Newberg, Acting Division Director, Stratospheric Protection Division, OAR; and Bella Maranion, Acting Branch Chief, Significant New Alternatives Policy Program (SNAP)

## REGULATORY SUPPORT & STREAMLINING

1. **Exempt R&D from NSPS Rules (especially Subparts RR, TT, FFF, & VVV)**
   - Request – Find approach to exempt R&D (not intended to be in-scope, but not specifically excluded)
   - EPA Contact – Peter Tsirigotis, Director, OAQPS Sector Policies & Programs Division (919-541-9411)

2. **Streamline MACT & NSPS Rules for Web Coating Lines: 40 C.F.R. Parts 60 & 63**
   - Request – Promulgate one unified coating rule to simplify and consolidate compliance requirements for facilities currently subject to up to eight (8) existing web coating rules at 40 C.F.R. Parts 60 & 63.
   - EPA Contact – Peter Tsirigotis, Director, OAQPS Sector Policies & Programs Division (919-541-9411)

3. **Protect Trade Secrets and Confidential Business Information from Disclosure (CBI)**
   - Request – Revise all regulations and guidance to clearly define "emission data" so that companies are not required to disclose trade secrets and CBI, such as capacity and throughput. Also streamline the administrative process for asserting CBI and trade secret claims.
   - EPA Contact – TBD

4. **Revised the Definition of Solid Waste: 40 C.F.R. Parts 260 & 261**
   - Request – Amend solid waste definition (80 Fed. Reg. 1693, Jan. 13, 2015) to support beneficial use of materials and avoid unnecessary and counter-productive restrictions.
   - EPA Contact – TBD

## 3M CONTACTS

John Ostergren – Vice President and Global Head of EHS, 651-733-0506, jostergren@mmm.com
Paul Narog – Manager, Corporate Environmental Operations, 651-737-3583, pfnarog@mmm.com
John Metzger – Senior Regulatory Affairs Specialist, 651-737-3580, jfmetzger@mmm.com

**To:** Ex. 6 - Personal Privacy
**Cc:** Ford, Hayley[ford.hayley@epa.gov]; Jackson, Ryan[jackson.ryan@epa.gov]
**From:** Munoz, Charles
**Sent:** Mon 7/10/2017 6:27:34 PM
**Subject:** EPA Vetting Document
PAS_PA Bio Sheet.pdf

Ex. 6 - Personal

Thank you for taking my call earlier. Attached you will find the document we discussed over the phone. Please fill this out and return it at your earliest convenience.

Also, if any questions arise, please don't hesitate to call or email and I'll be happy to assist.

Thanks,

Charles Munoz

White House Liaison

Environmental Protection Agency

202-380-7967

OFFICE OF THE PRESIDENT
Presidential Personnel Office

# APPOINTEE INFORMATION SHEET

**NOTICE:** Review the instructions on the reverse of this form. Return to the Office of Presidential Appointments as soon as complete. This information is necessary to begin the clearance process. Return via email to incomingPPOdocs@who.eop.gov or contact the office for alternate submission methods.

## PART I: TO BE COMPLETED BY POTENTIAL APPOINTEE

| | |
|---|---|
| 1. FULL NAME (Last, First, Middle): | 2. SOCIAL SECURITY NUMBER: |
| 3. CURRENT RESIDENTIAL ADDRESS (Number, Street, City, State, ZIP Code) | |
| 4. VOTING ADDRESS IN 2016 (Number, Street, City, State, ZIP Code) | |

| | | |
|---|---|---|
| 5. PLACE OF BIRTH (City, State; if not U.S., state country) | 6. GENDER | 7. DATE OF BIRTH |
| 8. ETHNIC HERITAGE | 9. RACE | 10. POLITICAL PARTY |

| | | |
|---|---|---|
| 11. HOME PHONE | 12. CELL PHONE | 13. WORK PHONE |

| | |
|---|---|
| 14. PERSONAL EMAIL | 15. WORK EMAIL |
| 16. CURRENT POSITION (Title, Company) | 17. WORK ADDRESS (Number, Street, City, State, Zip) |
| 18. SPOUSE | 19. CHILDREN |
| 20. NAME AND HOME STATE (For official announcement and nomination) | |
| 21. EDUCATION (Degree, Institution, Year) | 22. AWARDS |
| 23. MILITARY SERVICE (Rank, Branch, Years) | 24. PREVIOUS PRESIDENTIAL APPOINTMENTS |

## PART II: TO BE COMPLETED BY PRESIDENTIAL PERSONNEL

| | | |
|---|---|---|
| 1. POSITION | | |
| 2. TYPE | 3. VICE | 4. TERM |
| 5. POTUS APPROVAL | 6. SECURITY PACKAGE SENT | 7. COUNSEL START |