

US EPA ARCHIVE DOCUMENT

FEDERAL AGENCY: U.S. Environmental Protection Agency, Office of Chemical Safety and Pollution Prevention, Office of Pollution Prevention and Toxics, Regional Pollution Prevention Program Offices

FUNDING OPPORTUNITY TITLE: FY 2016 and FY 2017 Pollution Prevention Grant Program

STATUTORY AUTHORITY: Pollution Prevention Act of 1990, Section 6605, Public Law 101-508

ANNOUNCEMENT TYPE: Request for Proposals

CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NUMBER: 66.708

FUNDING OPPORTUNITY NUMBER: EPA-HQ-OPPT-2016-002

SUBMISSION DATE: Proposals are due **Monday, May 9, 2016, 11:59 pm, (EDT)**. Proposals will be electronically date and time stamped. EPA will receive proposals electronically through Grants.gov. Please refer to **Section IV** for full information on the submission process. Proposals must be submitted on time in order to be considered for funding.

SUMMARY OF ANNOUNCEMENT

EPA is announcing a two-year grant competition cycle to support two-year Pollution Prevention (P2) assistance agreements. EPA anticipates awarding approximately \$7.94 million in federal P2 grant funding (\$3.97 million in FY 2016 and \$3.97 million in FY 2017) to state entities, federally-recognized tribes and intertribal consortia that propose to deliver P2 technical assistance and/or training to businesses. EPA will not issue a P2 request for proposal (RFP) in FY 2017. Grant funds may be used to support state and tribal-led P2 programs or projects that measurably reduce the environmental footprints of local and regional businesses. Achievements in this regard involve adopting new or expanding existing environmental strategies or solutions that significantly reduce or eliminate pollution from air, water and/or land prior to relying on recycling or waste clean-up. P2 awards may be funded in the form of grants or cooperative agreements and will be issued and managed through EPA's Regional Pollution Prevention Program Offices. The amount of grant funding released each year is dependent upon Congressional appropriation and the quality of proposals received.¹

Applicants are strongly encouraged to read this announcement in its entirety as it provides important new information on the goals of the program, offers updated grant policies and program requirements, and provides revised evaluation criteria.

¹ Region 1 will apply a federal award cap of \$65,000 per year – making the total federal award under the two-year funding period \$130,000. The exception to this cap is awarding \$80,000 per year – making the total federal award under the two-year funding period \$160,000, with the stipulation that proposals which request \$80,000 per year – must clearly indicate the option of requesting partial funding (refer to **Section II.C**) for further details on receiving partial funding). Proposals requesting \$80,000+ per year must clearly indicate a priority ranking of each grant project activity.

TABLE OF CONTENTS

I. FUNDING OPPORTUNITY DESCRIPTION.....	3
A. Programmatic Description	3
B. Program Elements.....	3
C. Scope of Work P2 National Emphasis Areas	5
II. AWARD INFORMATION.....	8
A. Number of Expected Awards and Funding Amounts	8
B. Funding Types	8
C. Partial Funding.....	9
III. ELIGIBILITY	9
A. Eligible Applicants.....	9
B. Cost Sharing and Matching Requirements	9
C. Special Requirement for States, Tribes, Intertribal Consortia and Insular Area Applicants Using Performance Partnership Grant Agreements	10
D. Threshold Program Requirements	10
E. Threshold Submission Requirements	11
IV. PROPOSAL AND SUBMISSION INFORMATION	11
A. Submission Deadline	11
B. Requirement to Submit Proposals through Grants.gov and Limited Exception Procedures	11
C. Grants.gov Submission Instructions	13
D. Technical Issues with Submission	14
E. Proposal Length and Format.....	15
F. Additional Solicitation Clauses Pertaining to Proposals and Submission Information.....	16
G. Opportunity for Questions and Answers Regarding this Announcement.....	16
V. PROPOSAL EVALUATION AND REVIEW INFORMATION	16
A. Evaluation Criteria.....	16
B. Review and Selection Process	18
VI. AWARD ADMINISTRATION INFORMATION.....	18
A. Award Notification	18
B. Submission Requirements.....	19
C. Administrative Requirements	19
D. Additional Solicitation Clauses Concerning Award Administration.....	20
VII. AGENCY CONTACTS.....	20

APPENDICES

Appendix A National Emphasis Area Project Examples	A-1
Appendix B Sample Cover Page	B-1
Appendix C Guidance for Addressing the Selection Criterion on Environmental Results and Measurement	C-1
Appendix D Project Timeline Samples	D-1
Appendix E Itemized Budget Detail Guidance and Sample	E-1

FULL TEXT OF ANNOUNCEMENT

Section I. Funding Opportunity Description

A. Programmatic Description: Under the authority of the Pollution Prevention Act of 1990 (PPA) EPA is announcing a two-year competitive funding opportunity through this request for proposals (RFP). The agency anticipates awarding approximately \$7.94 million in federal Pollution Prevention (P2) grant funding during Fiscal Years (FY) 2016 and 2017 (\$3.97 million in FY 2016 and \$3.97 million in FY 2017) to state entities, federally-recognized tribes and intertribal consortia to provide technical assistance and/or training to businesses.² EPA will not issue an RFP in FY 2017. Awards will be issued and managed through EPA's Regional Pollution Prevention Program Offices. Award money will be released in the form of grants or cooperative agreements. The assistance agreements will be awarded under the authority of Section 6605 of the PPA of 1990, public law 101-508, 42 USC 13104, 40 CFR 35.340 and 35.660. Refer to <http://www.epw.senate.gov/envlaws/PPA90.pdf> for more information.

Proposals will be screened on: addressing Program Elements, numbered 1-6 (**Section I.B**); addressing Scope of Work Requirements (**Section I.C**); addressing Partial Funding, if applicable to the proposal (**Section II.C**); meeting Eligibility Requirements (**Sections III.A-C**); addressing Threshold Program and Threshold Submission Requirements (**Sections III.D-E**); addressing Proposal and Submission Information (**Sections IV.A-G**); and addressing all Evaluation Criteria (**Section V.A**). With this RFP, the EPA looks forward to reviewing substantive proposals that adopt new or expand existing environmental strategies or solutions that will significantly reduce or eliminate pollution from air, water and/or land.

B. Program Elements:

- 1. Statutory Authority Criteria:** As mandated under Section 6605(b) of the PPA and EPA's P2 regulations 40 CFR 35.342 and 35.661, a P2 grant proposal must address at least **one or more** of the following:

² State entities refers to state agencies, state colleges or universities. Colleges or universities that are agencies or instrumentalities of a state government are eligible. Colleges or universities that are not chartered as a part of state government are not eligible. Colleges and universities must include documentation demonstrating that they are chartered as a part of a state government. Documentation may include, but is not limited to: a state constitutional reference, college/university charter, W-7 tax form that has confirmed the college or university to serve as an instrumentality of a state. Federally-recognized tribes and intertribal consortia must meet the requirements for treatment in a manner similar to a state. These requirements are referenced in 40 CFR 35.663 and 40 CFR 35.504 respectively.

- a. Makes specific technical assistance available to businesses seeking information about source reduction opportunities, including funding for experts to provide on-site technical advice to businesses and to assist in the development of source reduction plans;
- b. Targets assistance to businesses for whom lack of information is an impediment to source reduction; or
- c. Provides training in source reduction techniques. Such training may be provided through local engineering schools or other appropriate means.

2. How is P2 Defined? Pollution prevention means "source reduction," as defined under the Pollution Prevention Act and refers to practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources; or protection of natural resources using conservation methods. Reducing the amount of pollution produced means less waste to control, treat, or dispose. Less pollution means less hazards posed to public health and the environment. For purposes of this announcement, P2 does not include any practice which alters the physical, chemical, or biological characteristics or the volume of a hazardous substance, pollutant, or contaminant through a process or activity which itself is not integral to and necessary for the production of a product or the providing of a service (refer to PPA Section 6603 and 40 CFR 35.343 and 35.662). Recycling of discarded materials cannot serve as a basis for P2 grant funding and is more suited for funding awarded by [EPA's Office of Resource Conservation and Recovery](#).

3. Examples of P2: The national P2 Program encourages technical assistance and/or training on source reduction to businesses. Management or processing of non-hazardous solid waste – including recycling – are not considered pollution prevention and are not eligible for funding under this grant program. General methods for carrying out P2 activities include, but are not limited to: **1)** motivating businesses to reconsider their manufacturing, supply-chain or sale operations, adopting environment-friendly P2 approaches or tools, **2)** growing or enhancing state or community-based P2 projects or programs to help area businesses decrease their environmental footprints, **3)** providing robust P2 training or partnerships that produce significant P2 outcomes. For more examples on carrying out P2 projects, refer to EPA's [P2 Grant Summaries](#), describing previously awarded P2 grants.

4. Expected Environmental Outcomes And Outputs: As directed under EPA's Environmental Results Policy Order, 5700.7A1 and authorized under Section 6605 of the PPA (Public Law 101-508, 42 U.S.C 13104), the Agency "shall establish appropriate means for measuring the effectiveness of the State grants made under this section in promoting the use of source reduction techniques by businesses." Applicants are required to provide qualitative and quantitative estimates of expected outcomes and outputs of P2 grant project activities as discussed in **Section V.A** and provide a plan for tracking and measuring progress towards achieving these results. For expected outcomes, include a plan to document results at the facility or entity level. In limited cases, EPA will consider awarding points when a credible explanation of why reporting outcomes at the facility-level would prove too burdensome or raise confidentiality concerns which cannot be overcome. Guidance for addressing Environmental Results and Measurement is found in **Appendix C**.

5. Linkage to EPA's Strategic Plan: Applicants are required to commit to working towards the five long-term P2 targets provided in the Agency's FY 2014-2018 Strategic Plan. The P2 Program's targets are located under Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution, Objective 4.2: Promote Pollution Prevention.

Strategic Plan Measures:

- By 2018, reduce 600 million pounds of hazardous materials cumulatively through pollution prevention.³
- By 2018, reduce 7 million metric tons of carbon dioxide equivalent (MMTCO₂Eq.) cumulatively through pollution prevention.
- By 2018, reduce 6.9 billion gallons of water use cumulatively through pollution prevention.
- By 2018, save \$1.3 billion in business, institutional, and government costs cumulatively through pollution prevention improvements.
- By 2018, increase the number of safer chemicals and safer chemical products cumulatively by 1,900.⁴

To view the Plan, click here: [EPA's FY 2014-2018 Strategic Plan](#). Refer to pp. 35-36 and p.72 for information related to P2.

6. Engaging Partners in P2 Grant Work: Applicants are encouraged to develop relationships with technical assistance providers or environmental programs to strengthen their resource building capacity.

a. Types of Partnerships: Partnerships may include university-based technical assistance and cooperative extension programs, and other environmental assistance programs offered within a State or Tribe. Partnerships are also encouraged among trade organizations, federal programs and with regional and national programs such as with the Pollution Prevention Resource Exchange (P2Rx) Centers, EPA's Office of Enforcement and Compliance Assurance (OECA) Compliance Assistance Centers, EPA's Small Business Environmental Assistance Programs (SBEAPs), the Department of Commerce's National Institute of Standards and Technology (NIST) Manufacturing Extension Partnership Program, the Department of Energy's (DOE) Industrial Assessment Centers, etc.⁵ By developing such partnerships, applicants can leverage expertise.

b. Making Use of P2Rx Centers: EPA annually allocates a portion of its State and Tribal assistance grant funding to support the dissemination of P2 news and peer-reviewed outreach information through eight regional networks called [P2Rx Centers](#). The Centers promote networking through regional and national listservs, websites, webinars and conferences. Applicants are encouraged to contact their regional P2Rx Center to explore opportunities for collaboration. Applicants are also encouraged to ask P2Rx Centers for P2 information or services that may enhance or help deploy their proposed work.

C. Scope of Work – P2 National Emphasis Areas: EPA's national P2 Program has adopted three topic

³ Hazardous releases to air, water and land are included in hazardous materials.

⁴ This strategic goal is recognized by the [Safer Choice Program](#).

⁵ If a partnership is formed with another federal government program, the cash or in-kind contribution may not be used by the applicant to supplement the match requirement of the P2 assistance agreement. For more information on Cost Sharing and Matching Requirements, refer to **Section III.B**.

areas referred to as P2 National Emphasis Areas (NEAs) in order to reflect national environmental themes and priorities. The Program views these topic areas as suitable for amplifying technical assistance and/or training to businesses. Applicants are to choose **one or more** of the NEA topic areas as the basis for their P2 grant proposals. Each NEA provides goal language that explains the intent for using P2 grant funds.

1. **Climate Change Mitigation/Prevention of Greenhouse Gas Emissions:** Implement P2 projects that are specifically designed and targeted to achieve significant and measureable reductions of greenhouse gas (GHG) emissions and/or energy efficiency through technical assistance to businesses.
2. **Food Manufacturing and Processing:** Implement P2 projects to support more sustainable food manufacturing and processing resulting in reduced greenhouse gas emissions, water usage, hazardous materials generation and use, and/or business costs.
3. **State or Community Approaches to Hazardous Materials Source Reduction:** Implement P2 projects to support state or community-based approaches to hazardous materials source reduction activities that reduce the generation and use of hazardous materials.⁶

Note: Some EPA Regions have elected to add Regional Focus Areas that expand upon the NEAs and reflect Regional Pollution Prevention Program needs. If Regional Focus Areas are offered by an EPA Region, applicants must address one or more of the focus areas in order to be considered for funding from that Region. Reference markers are placed by the Region's Focus Area to denote the NEA.

Region 1 (CT, ME, MA, NH, RI, VT) – The Region encourages applicants to submit proposals that:

- Carry out assistance and training to businesses on demand-side energy efficiency to reduce statewide GHG emissions. Such projects may: a) aim to achieve improvements in average energy conserved within a particular business or industrial sectors, b) involve collaborative projects with organizations or programs such as, trade associations; colleges and universities; municipal associations; small business development centers; and energy efficiency programs operated by utilities, or c) have the potential to be incorporated into state plans developed to comply with state requirements established under [EPA's Clean Power Plan developed under Section 111\(d\) of the Clean Air Act](#).⁷ NEA #1
- Focus on establishing food-manufacturing roundtables for dairy and seafood processors or other food manufacturing or processing subsectors. Applicants are encouraged to incorporate [Energy Star Portfolio](#) and [Water Sense](#) planning into proposed projects. NEA #2

⁶ The term community as defined under this emphasis area applies to sectors, multi-organizational partnerships and encompasses the definition used under the agency's cross-agency strategy action plan on communities. For more information, click on: <http://www.epa.gov/sites/production/files/2015-12/documents/fy16-communities-action-plan.pdf>.

⁷ Under §111 of the Clean Air Act (CAA) EPA has the broad authority to issue standards, regulations or guidelines that address greenhouse gas emissions released by new and existing electric utility power plants, including modifications to those plants. Under §111(d) of the CAA, EPA has the authority to establish air emission guidelines while the states have the authority to design and support environmental programs to carry out those guidelines in order to realize air emission reductions. P2 grants may be used to support measures to help carry out those guidelines.

- Assist small businesses in using source reduction principles and approaches to reduce the risk of hazardous material releases. Such approaches may include P2 practices that reduce a facility's compliance requirements under EPA or similar state environmental regulations (e.g., eliminating use of metallic hazardous air pollutants in spray coating regulated under EPA's air toxics standard for motor vehicle and miscellaneous spray coating; providing training to spray painters in appropriate spray technique (refer to 40 CFR 63, Subpart H); eliminating use of halogenated solvent degreasing for parts cleaning (refer to 40 CFR 63, Subpart T); or substituting professional wet cleaning for use of perchloroethylene by fabric cleaners (refer to 40 CFR 63, Subpart M) or their state equivalents). **NEA #3**

Region 2 (NJ, NY, PR, and VI) – The Region encourages proposals from all states and territories in the Region, and will give special emphasis to proposals that focus on:

- Manufacturing and service sectors in Puerto Rico and the U.S. Virgin Islands. **NEA #1**
- Food manufacturing and processing sectors involving small businesses in Puerto Rico and the U.S. Virgin Islands. **NEA #2**
- Green engineering and green chemistry approaches in Puerto Rico and the U.S. Virgin Islands. **NEA #3**

Region 10 (AK, ID, OR, WA) – The Region encourages applicants to submit proposals that seek to:

- Improve effectiveness of [Green Chemistry](#) alternatives technical assistance (Interstate coalition building, [Safer Choice](#), education on chemical hazard assessment tools) for source reduction in communities. **NEA #3**
- Develop intern programs, [Lean/E3](#) or inter-industry best management practices to improve source reduction in the dry cleaner, automotive repair, seafood, brewery and fruit/vegetable processor sectors. **NEAs #2 and #3**
- Promote interstate coordination of technical assistance source reduction efforts to improve surface water quality through working groups such as the Spokane River Regional Toxics Task Force and the Columbia River Toxics Reduction Working Group to improve the efficiency of state and community source reduction efforts. **NEA #3**
- Provide source reduction technical assistance for communities that exceed national ambient air quality thresholds. **NEA #3**

Note: To help inform all applicants on the kinds of P2 grant activities that can carry out each NEA goal, the P2 Program has worked collectively to offer a range of grant project examples. These examples illustrate the kinds of P2 grant projects that may be considered for development. Applying any example will not increase an applicant's chance of being considered for grant funding. Refer to Appendix A.

Section II. Award Information

A. Number of Expected Awards and Funding Amounts: The EPA through the Regional P2 Program Offices anticipates awarding approximately \$7.94 million in federal P2 grant funding (\$3.97 million in FY 2016 and \$3.97 million in FY 2017). Individual P2 grant awards are expected to be in the range of \$40,000-\$360,000 issued over a two-year funding period to support two-year assistance agreements. FY 2016 represents the period from October 1, 2015 – September 30, 2016. FY 2017 represents the period from October 1, 2016 – September 30, 2017. The dollar amount refers to the federally funded portion of the grant.

The quantity of grants issued will depend upon Congressional appropriation and the quality of proposals received.⁸ EPA anticipates receiving approximately 60 proposals and funding approximately 30-40 awards to support two-year assistance agreements. EPA anticipates that final selections will be made 180 days after this announcement is published. Each EPA Region reserves the right to reject all proposals and issue no awards, or issue fewer awards than anticipated. All awards will be consistent with the applicable EPA regulations and grant policies. In addition, each EPA Region reserves the right to issue additional awards under this announcement, if additional funding becomes available. Additional awards will be made no later than six (6) months from the date of the original selections.

B. Funding Types: P2 grant funds will be issued in the form of grants and/or cooperative agreements under the authority of PPA, Section 6605 to cover a two-year funding period.

Grants: An award of financial assistance by the federal government to an eligible recipient in the form of money, property or in kind assistance in lieu of money by the federal government to an eligible recipient. The term does not include: technical assistance from federal employees or contractors or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Also, the term does not include assistance, such as a fellowship or other lump sum award, which the recipient is not required to account for. The Region will not be substantially involved in the performance of grants.

Cooperative agreements: These types of agreements permit substantial involvement between the EPA Project Officer and the selected applicants in the performance of the work supported. Although EPA will negotiate precise terms and conditions relating to substantial involvement as part of the award process. If a cooperative agreement is awarded EPA will have substantial technical interaction with the grant recipient. EPA will:

- Review and approve project phases;
- Review proposed work of sub-grantees and contractors collaborating with the recipient;
- Review and approve proposed procurements in accordance with 2 CFR 200.317 and 2 CFR 200.318;
- Monitor the operation of the projects;
- Approve qualifications of key personnel (EPA will not select employees or contractors employed by the award recipient);

⁸ Region 1 will apply a federal award cap of \$65,000 per year – making the total federal award under the two-year funding period \$130,000. The exception to this cap is awarding \$80,000 per year – making the total federal award under the two-year funding period \$160,000, with the stipulation that proposals which request \$80,000 per year – must clearly indicate the option of requesting partial funding (refer to **Section II C.** for further details on receiving partial funding). Proposals requesting \$80,000+ per year must clearly indicate a priority ranking of each grant project activity.

- Closely monitor the recipient's performance;
- Approve any proposed changes to the work plan and/or budget; and
- Review and comment on tasks or deliverables and reports or publications prepared under the cooperative agreement (the final decision on the content of reports rests with the recipient).

C. Partial Funding: In appropriate circumstances, EPA may reserve the right to partially fund proposals by funding discrete activities, portions, or phases of a proposal. If EPA decides to partially fund a proposal it will do so in a manner that will not prejudice any applicant or affect the basis upon which a proposal or a portion thereof will be evaluated or selected for an award and therefore maintain the integrity of the competition, evaluation and selection process.

Partial funding allows for flexibility in awarding P2 grant funds. In order to be considered for partial funding, the applicant must draft two-year budgets that have clearly delineated activities or phases with separate budget estimates for each activity/phase of a project within the two-year budget period. The proposals must include two-year budget plans that estimate costs for each category (e.g., labor, fringe benefits, travel, equipment, supplies, contractors, and other direct costs or indirect costs). The two-year budgets are to itemize these costs under each project and are to identify activities (and corresponding estimated costs) covered by the 50 percent match. Refer to **Section III.B.** for additional information on match requirements.

Section III. Eligibility

A. Eligible Applicants: Section 6605 of the PPA and applicable parts of 40 CFR Part 35, Subparts A and B (40 CFR 35.340 et seq. and 35.660 et seq.) authorizes EPA to award grants and cooperative agreements to the fifty states, the District of Columbia, the U.S. Virgin Islands, the Commonwealth of Puerto Rico, any territory or possession of the U.S. (40 CFR 35.345), any agency or instrumentality of a state, including state colleges/universities, federally-recognized tribes that meet the requirements for treatment in a manner similar to a state (40 CFR 35.663) and intertribal consortia (40 CFR 35.504).⁹

B. Cost Sharing and Matching Requirements: P2 grant recipients, as required under Section 6605(c) of the PPA, must provide at least a 50 percent match of the total allowable project cost. For example, the federal government will provide half of the total allowable cost of the project and the recipient will provide the other half. *The match requirement may be applied at the time of award or at specified intervals during the project period.* Cost sharing and matching contributions may include, but is not limited to: dollars; in-kind goods and services (such as volunteered time, photocopying and printing services, etc.); third-party contributions consistent with 2 CFR 200.306; university faculty time or effort which can be offered as a cash contribution as long as the cost sharing occurs during the assistant agreement project period and while the faculty member is under a continuing contract with the university; etc. The applicant must document in the budget the type of match applied and how it will be used. The grant project officer in the Region will monitor the grant recipient's compliance. If the match requirement is not met or is not applied at specified

⁹ Colleges or universities that are agencies or instrumentalities of a state government are eligible. Colleges or universities that are not chartered as a part of state government are not eligible. Colleges and universities must include documentation demonstrating that they are chartered as a part of a state government. Documentation may include: a state constitutional reference, college/university charter, W-7 tax form that has confirmed the college or university to serve as an instrumentality of a state.

intervals during the project period, federal funding will cease and the recipient may be subject to an enforcement action, whereby EPA may, for example, disallow costs.¹⁰

Note: Cost sharing and matching requirements for proposals under \$200,000 for Insular area applicants (the U.S. Virgin Islands, American Samoa, Guam and the Northern Mariana Islands) are waived as a matter of law as authorized by the Omnibus Territories Act of 1977, as amended, 48 U.S.C. Section 1469a. Insular area applicants with proposals that require a cost share of \$200,000 or greater are advised to contact EPA to determine if cost share requirements will be waived in whole or in part. For more information, contact the applicable Region noted in **Section VII**.

C. Special Requirements for States, Tribes, Intertribal Consortia and Insular Area Applicants Using Performance Partnership Grant (PPG) Agreements: Applicants from states, federally-recognized tribes and insular areas that intend to include P2 grant funds in a PPG will need to address the following:

1. **PPG Requirement for States:** States that include P2 grant funds in PPGs must describe and implement the commitments of P2 workplans as part of PPG agreements. Refer to 40 CFR 35.138.
2. **PPG Requirement for Tribes:** Tribes that choose to include P2 grant funds in PPGs must describe and implement grant commitments of P2 workplans as part of PPG agreements. **If tribes successfully incorporate P2 workplans into PPGs, the match requirement for the P2 portion of the work will be reduced from 50 percent to 5 percent.** The reduction in match applies to the first two years of PPG agreements. If PPG commitments significantly differ from P2 grant commitments, then tribes will need to consult with their EPA Regional Administrator (RA) or delegated EPA official (refer to 40 CFR 35.535(b)). After the first two years, the RA or delegated EPA official will determine through objective assessment whether the tribes meet the socioeconomic indicators to provide a cost share greater than 5 percent. If the RA/delegated EPA official determines that tribes meet such indicators, the cost share shall increase up to a maximum of 10 percent of the total allowable cost of the project. However, the RA/delegated EPA official may waive the cost share if socioeconomic indicators indicate that making such an increase will impose undue hardship upon the tribes (refer to 40 CFR 35.536(d)).

D. Threshold Program Requirements: Proposals must meet the Threshold Program Requirements provided below at the time of submission in order to be considered for funding. *The Region will evaluate proposals based on these preliminary requirements. If proposals are found ineligible, emails or letters will be sent to applicants within 15 calendar days after the Region reaches its decision.*

Proposals must include the following items in order to be eligible for review under **Section V**.

1. Proposals must substantially comply with all P2 grant program elements and requirements in **Section I.B**;
2. Proposals must be from an eligible applicant as defined in Section III.A and the funding period must be for two years as noted in **Section II.A**;
3. Proposals must address **one or more** of the P2 National Emphasis Areas (**Section I.C**);
4. Proposals must address at least **one or more** of the technical assistance criteria. As mandated in PPA 6605(b) and EPA's P2 regulations within CFR 35.342 and 35.661.

¹⁰ For additional information on cost share or matching requirements, refer to [2 CFR 200.306](#).

- a. Make specific technical assistance available to businesses seeking information about source reduction opportunities, including funding for experts to provide on-site technical advice to businesses seeking assistance in developing source reduction plans;
 - b. Target assistance to businesses for whom lack of information is an impediment to source reduction; or
 - c. Offer training in source reduction techniques. Such training may be provided through local engineering schools or other appropriate means.
5. If a proposal includes ineligible tasks or activities (i.e., those not considered to be pollution prevention) that portion of the proposal will be ineligible for funding and may, depending on the extent to which it affects the proposal, render the entire proposal ineligible for funding.

E. Threshold Submission Requirements: This section addresses how applicants should prepare and submit proposal packages in order to be considered for funding.

- 1. Proposal packages must substantially comply with the submission instructions and requirements set forth in **Section IV.** of this announcement in order to be considered for funding or else they will be rejected.
- 2. Proposals must be submitted through [Grants.gov](https://www.grants.gov) as stated in **Section IV.** of this announcement (except in limited circumstances where another mode of submission is specifically allowed for as explained in **Section IV.**) on or before the proposal submission deadline. Applicants are responsible for following the submission instructions in **Section IV.** by the submission deadline.
- 3. Proposals submitted after the submission deadline will be considered late and deemed ineligible without further consideration unless the applicant can clearly demonstrate that it was late due to EPA mishandling or because of technical problems associated with Grants.gov or [System for Award Management \(SAM\)/SAM.gov](https://www.sam.gov) issues. An applicant's failure to timely submit their proposal through Grants.gov because they did not timely or properly register in SAM.gov or Grants.gov will not be considered an acceptable reason to consider a late submission. Applicants should confirm receipt of their proposals with their applicable Region noted in **Section VII.** as soon as possible after the submission deadline – failure to do so may result in proposals not being reviewed.
- 4. Applicants must adhere to the page limit requirement (**Section IV.C.4**).

Section IV. Proposal and Submission Information

A. Submission Deadline: Proposals are due **Monday, May 9, 2016, 11:59 pm (EDT).**

B. Requirement to Submit Proposals through Grants.gov and Limited Exception Procedures:

Applicants, except as noted below, must apply for P2 grant funding electronically through [Grants.gov](https://www.grants.gov) based on the Grants.gov instructions in this announcement. If an applicant does not have the technical capability to apply electronically through Grants.gov because of: 1) limited or 2) no Internet access which prevents them from being able to upload the required application materials to Grants.gov, the applicant must send an email to OGDWaivers@epa.gov or send a letter to the address offered below **at least 15**

calendar days prior to the submission deadline under this announcement to request approval to submit their application materials through an alternate method.

Mailing Address:
 OGD Waivers
 c/o Barbara Perkins
 USEPA Headquarters
 William Jefferson Clinton Building
 1200 Pennsylvania Ave., N.W.
 Mail Code: 3903R
 Washington, DC 20460

Courier Address:
 OGD Waivers
 c/o Barbara Perkins
 Ronald Reagan Building
 1300 Pennsylvania Ave., N.W.
 Rm # 51267
 Washington, DC 20004

In the request, the applicant must include the following information:

- Funding Opportunity Number (FON) – EPA-HQ-OPPT-2016-002;
- Organization's Name and DUNS Number;
- Organization's Contact Information (email address and phone number); and
- Explanation of why the applicant lacks the technical capability to apply electronically through [Grants.gov](https://www.grants.gov) because of: 1) limited Internet access or 2) no Internet access, which prevents them from being able to upload the required application materials through Grants.gov.

EPA will respond and only consider an alternate submission exception request based on the two reasons stated – all other requests will be denied. If an alternate submission method is approved, the applicant will receive documentation of the approval and further instructions on how to apply under this announcement. The applicant will be required to submit the documentation of approval with any initial application submitted under the alternative method. In addition, any submittal through an alternative method must comply with all applicable requirements and deadlines under this announcement including the submission deadline and requirements regarding proposal content and page limits (note: the documentation of approval of an alternate submission method will not count toward page limits).

If an alternate submission exception is granted, it is valid for submissions to EPA for the remainder of the entire calendar year in which the exception was approved and can be used to justify alternative submission methods for application submissions made through December 31 of the calendar year in which the exception was approved (e.g., if the exception was approved on March 1, 2016, it is valid for any competitive or non-competitive application submission to EPA through December 31, 2016). Applicants need only request an exception once in a calendar year and all exceptions will expire on December 31 of that calendar year. Applicants must request a new exception from required electronic submission through Grants.gov for submissions for any succeeding calendar year. For example, if there is a competitive opportunity issued on December 1, 2016 with a submission deadline of January 15, 2017, the applicant would need a new exception to submit through alternative methods beginning January 1, 2017.

Note: *The process described in this section (Section IV.B.) is only for requesting alternate submission methods.* All other inquiries about this announcement must be directed to the applicable Regional Contact listed in **Section VII**. Queries or requests submitted to the email address identified above for reasons other than to request an alternate submission method will not be acknowledged or answered.

C. Grants.gov Submission Instructions: The electronic submission of your application must be made by an official representative of your institution who is registered with Grants.gov and is authorized to sign applications for Federal assistance. For more information on the registration requirements that must be completed in order to submit an application through grants.gov, go to <http://www.grants.gov> and click on “Applicants” on the top of the page and then go to the “Get Registered” link on the page. If your organization is not currently registered with Grants.gov, please encourage your office to designate an Authorized Organization Representative (AOR) and ask that individual to begin the registration process as soon as possible. Please note that the registration process also requires that your organization have a DUNS number and a current registration with the System for Award Management (SAM) and the process of obtaining both could take a month or more. Applicants must ensure that all registration requirements are met in order to apply for this opportunity through grants.gov and should ensure that all such requirements have been met well in advance of the submission deadline. Registration on grants.gov, SAM.gov, and DUNS number assignment is FREE.

Applicants need to ensure that the AOR who submits the application through Grants.gov and whose DUNS number is listed on the application is an AOR for the applicant listed on the application. Additionally, the DUNS number listed on the application must be registered to the applicant organization’s SAM account. If not, the application may be deemed ineligible.

To begin the application process, go to [Grants.gov](http://www.grants.gov) and click on “Applicants” on the top of the page and then “Apply for Grants” from the drop down menu and then follow the instructions accordingly.

Note: To apply through Grants.gov you must use Adobe Reader software and download the compatible Adobe Reader version. For more information about Adobe Reader, to verify compatibility, or to download the free software, please visit [Adobe Software Compatibility](http://www.adobe.com/reader/compatibility).

You may also be able to access the P2 grant proposal package by searching for the funding opportunity on [Grants.gov](http://www.grants.gov). Go to [Grants.gov](http://www.grants.gov) and then click on “Search Grants” at the top of the page and enter the Funding Opportunity Number – **EPA-HQ-OPPT-2016-002**, or the CFDA number – **CFDA 66.708**, in the appropriate field and click the Search button. Alternatively, you may be able to access the application package by clicking on the “Package” button at the top right of the synopsis page for the announcement on [Grants.gov](http://www.grants.gov). To find the synopsis page, go to [Grants.gov](http://www.grants.gov) and click “Browse Agencies” in the middle of the page and then go to “Environmental Protection Agency” to find the EPA funding opportunities.

Application Submission Deadline: Your organization’s AOR must submit your complete application package electronically to EPA through Grants.gov (<http://www.grants.gov>) no later than **11:59 pm EDT on Monday, May 9, 2016**. Please allow for enough time to successfully submit your application process and allow for unexpected errors that may require you to resubmit.

Applicants are to submit *all* proposal materials described below using the [Grants.gov](http://www.grants.gov) application package download and using the instructions above. For additional instructions on completing and submitting the package, click on the “Show Instructions” tab. The materials numbered 1 – 5 below are to be submitted with the proposal in order to receive funding consideration. **Please load materials using the instructions provided on Grants.gov.**

1. Cover Page will include:

- a. Grant Name and Funding Opportunity Number;

- b. Title of proposal;
- c. Short description of proposal;
- d. Total funding of project and Requested funding of project;
- e. Contact information (i.e., name of applicant, name of organization, mailing address, phone number, fax number, and email address); and
- f. System for Award Management Registration Date (**refer to Section IV.F**).

Note: A sample Cover Page is provided in **Appendix B**.

2. **Application for Federal Assistance Form (Standard Form (SF)-424):** When filling out this form applicants must provide a Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number. Applicants can receive a DUNS number, at no cost, by calling the toll-free DUNS Number request line at 1-866-705-5711, or visiting the D&B website: <http://fedgov.dnb.com/webform>.
3. **Key Contacts Form (5700-54):** Please identify key personnel who will file and manage the paperwork, fund activities and direct the proposal.
4. **Proposal:** The proposal includes parts – *a* and *b* noted below. The proposal should address all evaluation criteria (**Section V.A**). *The proposal is subject to a 10-page single sided, page limit. The cover page, federal form, key contacts, letters of support, resumes, budget plan details and timelines do not count toward the 10 page limit.*
 - a. Narrative: Applicants are asked to address their programmatic capability and past performance under previous grant agreements.
 - b. Strategy: The proposal strategy should lay out a realistic and thoughtful plan for implementing P2 technical assistance and/or training under one or more of the P2 NEAs over a two-year federal funding period. Applicants should explain how their proposal will address the evaluation criteria in **Section V.A**. Note: Providing charts/tables/graphs of timelines and budget planning details to help explain the time and budget criteria will not count as part of the 10-page limit.
5. **Letters of Support:** Letters of Support are to describe the service(s) the grant partner(s) will provide to help carry out and enhance the project activity.

D. Technical Issues With Submission

1. Once the application package has been completed, the “Submit” button should be enabled. If the “Submit” button is not active, please call Grants.gov for assistance at 1-800-518-4726. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. Applicants should save the completed application package with two different file names before providing it to the AOR to avoid having to re-create the package should submission problems be experienced or a revised application needs to be submitted.
2. Submitting the application. The application package must be transferred to Grants.gov by an AOR. The AOR should close all other software before attempting to submit the application package. Click

the “submit” button of the application package. Your Internet browser will launch and a sign-in page will appear.

Note: Minor problems are not uncommon with transfers to Grants.gov. It is essential to allow sufficient time to ensure that your application is submitted to Grants.gov BEFORE the due date identified in Section IV of this announcement. The Grants.gov support desk operates 24 hours a day, seven days a week, except Federal Holidays. A successful transfer will end with an onscreen acknowledgement. For documentation purposes, print or screen capture the acknowledgement. If a submission problem occurs, reboot the computer – turning the power off may be necessary – and re-attempt the submission. Note: Grants.gov issues a “case number” upon a request for assistance.

3. **Transmission Difficulties.** If transmission difficulties that result in a late transmission, no transmission, or rejection of the transmitted application are experienced, and following the above instructions does not resolve the problem to ensure the application is submitted to Grants.gov by the deadline date and time, follow the guidance below.

The Agency will make a decision concerning acceptance of each late submission on a case-by-case basis. All emails, as described below, are to be sent to Michele Amhaz (amhaz.michele@epa.gov) with the FON in the subject line. If you are unable to send an email, contact Michele Amhaz at 202-564-8857. Be aware that EPA will only consider applications that were unable to transmit due to Grants.gov or relevant www.Sam.gov system issues or for unforeseen exigent circumstances, such as extreme weather interfering with Internet access. Failure of an applicant to submit a proposal in a timely manner because they did not properly or timely register in SAM.gov or Grants.gov is not an acceptable reason to justify acceptance of a late submittal.

- a. If you are experiencing problems resulting in an inability to upload the application to Grants.gov, it is essential to call Grants.gov for assistance at 1-800-518-4726 before the application deadline. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. Be *sure* to obtain a case number from Grants.gov. If the problems stem from unforeseen exigent circumstances unrelated to Grants.gov, such as extreme weather interfering with Internet access, contact Michele Amhaz at 202-564-8857.
- b. **Unsuccessful transfer of the application package:** If a successful transfer of the application cannot be accomplished even with assistance from Grants.gov due to electronic submission system issues or unforeseen exigent circumstances, email Michele Amhaz (amhaz.michele@epa.gov) prior to the application deadline. The email message must document the problem and include the Grants.gov case number as well as the entire application in PDF format as an attachment.
- c. **Grants.gov rejection of the application package:** If a notification is received from Grants.gov stating that the application has been rejected for reasons other than late submittal promptly email Michele Amhaz, (amhaz.michele@epa.gov) with the FON in the subject line within 1 (one) business day of the closing date of this announcement. The email should include any materials provided by Grants.gov and attach the entire application in PDF format.

E. Proposal Length and Format: Regions will review proposal narratives up to 10 single sided, single-spaced pages (i.e., a page equals one side). The page limit only pertains to the proposal (Section IV.C.4). Proposals are to be submitted in Adobe PDF or MS Word.

F. Additional Solicitation Clauses Pertaining to Proposals and Submission Information: Additional clauses apply to submitting proposals under this announcement, they include: **1) Confidential Business Information, 2) Pre-Proposal/ Application Assistance and Communication, 3) Management Fees, 4) Contracts and Subawards, 5) Duplication of Funding, 6) System for Award Management/SAM requirements, and 7) Restrictions on the use of Federal Funds;** all of which can be found at [Grant Solicitation Clauses](#). These clauses are important and applicants must review them when preparing proposals for this announcement. If you are unable to access the clauses electronically using the website above, please contact the applicable Region listed in **Section VII** of this announcement to obtain the information.

G. Opportunity for Questions and Answers Regarding this Announcement: EPA's national P2 Program will hold an informational question and answer webinar with potential applicants and interested stakeholders about this announcement through GoToWebinar. The webinar will be held on **Tuesday, March 22, 2016 from 2:00 PM – 3:30 PM EDT**. To register, visit GoToWebinar at: <https://attendee.gotowebinar.com/register/8202085536635495428>. The webinar will focus on the P2 Program's three grant programs and the P2 National Emphasis Areas featured in this grant announcement. Potential applicants are strongly encouraged to attend this information session. Attendees are advised to connect early (1:45 pm to 2:00 pm EDT) to ensure proper Internet connection and to type in questions. Frequently Asked Questions and Answers will be posted after the webinar to [EPA's P2 Grant page](#). For details on the types of questions EPA can respond to, please refer to grant solicitation clause [Pre-Proposal/ Application Assistance and Communication](#).

Section V. Proposal Evaluation and Review Information: Only eligible applicants with proposals that meet the threshold criteria in **Sections III.D-E** of this announcement will be reviewed based upon the evaluation criterion provided below. Each proposal will be rated using the points-scale system offered below. The maximum number of total points possible is 100 points.

A. Evaluation Criteria:

Criteria	Description	Points
Programmatic Capability*	a) Proposals will be evaluated based on the quality and extent to which they provide organizational experience, staff qualifications and use of funding to demonstrate sound skill in successfully completing proposed activities.	3
	b) Proposals will be evaluated based on the quality and extent to which they describe an approach, offer procedures and controls for ensuring that awarded grant funds will be expended in a timely and efficient manner.	3
Past Performance*	a) Proposals will be evaluated based on the quality and extent to which they document that applicants have successfully performed and managed federally-funded assistance agreements (federal grants and cooperative agreements and not contracts) of similar size, scope and relevance to the proposed project within the last <u>three years</u> .	3
	b) Proposals will be evaluated based on the quality and extent to which they document that applicants have complied with reporting requirements under prior federally-funded assistance agreements (including submission of final technical reports) that have been approved by an EPA grant project officer.	3
	c) Proposals will be evaluated based on the quality and extent to which they document that applicants have successfully achieved and adequately reported expected environmental outcomes under prior federally-funded assistance agreements. <i>Refer to Note below.</i>	3

*Note: In evaluating applicants' past performance history, the Regions will consider no more than five assistance agreements and may also consider relevant information from other sources including agency files and prior/current grantors (e.g., to verify and/or supplement the information supplied by the applicant). Applicants with no relevant or available past performance reporting history must indicate this in their proposal. Applicants falling into this category will receive a neutral score of [1.5 points for each subfactor]. Applicants that make no mention of programmatic capability and past performance will receive a score of [0 points] for these factors.		
Project Strategy & Technical Assistance/ Training Approaches	Proposals will be evaluated based on the extent and quality to which applicants:	
	a) Describe staff roles and responsibilities for carrying out the project strategy under one or more of the NEAs; and b) Describe a well-conceived strategy for using P2 technical assistance or training to achieve anticipated results associated with the project.	8 14
Environmental/ Human Health Concerns	Proposals will be evaluated based on the quality and extent to which applicants describe significant environmental and/or human health concerns that the project is designed to address, and identify how these relate to the Regional Focus Areas within the NEAs. If no Regional Focus Areas are expressed, applicants should indicate how these relate to one or more of the NEAs.	11
Environmental Results and Measurement	Proposals will be evaluated based on the quality and extent to which:	6
	a) Applicants provide qualitative and quantitative estimates of expected outcomes and outputs under one or more of the NEAs. b) Applicants provide a plan for tracking progress toward expected outcomes and outputs. Specifically, for expected environmental outcomes, the plan should address how the applicant will document results at the facility or entity level and tie them to the activities implemented. Refer to Appendix C.*	14
*Note: In limited cases, EPA will consider awarding points for a credible explanation of why reporting outcomes at the facility or entity level would be too burdensome or will raise confidentiality concerns which cannot be overcome.		
Partnerships	Proposals will be evaluated based on the quality and extent to which applicants describe a plan for engaging partners on the design and performance of the project and describe how project partners will help provide long-term support and capacity to continue the project.	8
Transferability	Proposals will be evaluated based on the quality and extent to which:	6
	a) Applicants describe a plan for how project deliverables (e.g., toolkits, assessment checklists, training modules, newsletters, smart phone apps, etc.), approaches and lessons learned (e.g., insights, challenges, successes, recommendations, etc.) will be packaged and/or promoted to <u>engage</u> other entities that access the material during and after the grant period. <i>Other entities may involve States, Tribes, technical assistance providers, businesses, communities, nonprofit organizations, etc.</i> b) Applicants explain how partners or other stakeholders will deploy project results during and after the grant period.	6

Timeline	Proposals will be evaluated based on the quality and extent to which applicants set forth a reasonable time schedule for executing tasks associated with the project. The timeline should cover a grant funding period of <u>two years</u> . The timeline should include a breakout of project tasks, anticipated dates (from start to completion of each task), milestone markers, and a brief explanation for achieving project goals and objectives by the end of the project. The goals should reference technical assistance and/or training and environmental data collection activities. Refer to Appendix D .	6
Budget	Proposals will be evaluated based on the quality and extent to which applicants describe and show a budget plan for <u>two years</u> . Each year should include: estimated costs for each project task and category (e.g., labor, fringe benefits, travel, equipment, supplies, contractors, and other direct costs or indirect costs) and use of the match requirement. Applicants should itemize the costs associated under each project and should identify activities (and corresponding estimated costs). Refer to Appendix E .	6

B. Review and Selection Process:

1. Eligible proposals will be reviewed by the Region's review panel. The review panel will be composed of P2 program staff and may include staff from other regional programs and/or HQ offices. Evaluations will be based on the evaluation criteria and point scoring noted in **Section V.A**. Review panels will use a consensus scoring evaluation process, whereby reviewers will individually evaluate proposals then regroup with their review team members to assess proposals for possible award funding. When assessing proposals, the Region's NEA focus area and/or geographic diversity may also be deciding factors when recommending proposals for funding consideration.
2. **Selection Process:** The Regions will prepare a list of selected applications along with selection rationale documentation, which will be sent to their Regional Division Director (RDD) for review and approval.
3. **Final Funding Decision:** The RDD will make final decisions based on evaluation rankings and preliminary recommendations of the review panel. In making final funding decisions, the RDD may also consider the Region's geographic diversity. Final concurrence of selected applications is required from the Chemistry, Economics and Sustainable Strategies (CESSD) Division Director or Deputy Director in EPA Headquarters. Once final decisions have been made, funding recommendations will be forwarded to EPA's Award Official within the Office of Grants and Debarment. The Regions *anticipate* final funding decisions will be made by August 31, 2016.

VI. Award Administration Information

A. Award Notification: After application packages have been reviewed and evaluated the Regions will notify applicants of their status, usually 60 – 90 days from the date of original submission. Notifications will be delivered by phone, email or post to the original signer of the Standard Form (SF) 424, Proposal for Federal Assistance. Notifications of recommend funding are only recommendations, and should not be regarded as official documentation to begin project work. Official documentation will come by electronic or postal mail from an EPA grants officer within the Office of Grants and Debarment.

B. Submission Requirements:

1. **Federal Requirements:** If an applicant's proposal shows merit for federal funding, the applicant will be contacted by the Region and instructed to submit required application forms. All application forms must be filled out in their entirety, prior to being considered for an award (refer to 2 CFR Part 200, as applicable). Successful applicants will be required to certify that they have not been debarred or suspended from participation in federal assistance awards in accordance with 2 CFR Part 108.
2. **Intergovernmental Review:** The P2 grant program is eligible for coverage under E.O. 12372, "Intergovernmental Review of Federal Programs" and 40 CFR Part 29. Applicants selected for funding may be required to provide a copy of their application to their State Points of Contact (SPOC) for review, pursuant to Executive Order 12372, Intergovernmental Review of Federal Programs. This review is not required with the Initial Application and not all states require such a review. The SPOCs may be viewed at: http://www.whitehouse.gov/omb/grants_spoc. *Federally-recognized Tribal governments are not required to comply with this procedure.*

C. Administrative Requirements:

1. **Award Management:** Awards issued in FY 2016 will be managed by the appropriate Region.
2. **Quality Assurance and Quality Control (QA/QC):** Certain quality assurance and/or quality control (QA/QC) and peer review requirements are applicable to the collection of environmental data. Environmental data are any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology. Environmental data also include information collected directly from measurements, produced from models, and obtained from other sources such as databases or published literature. Regulations pertaining to QA/QC requirements can be found in 2 CFR 1500.11. Additional guidance can be found at <http://www.epa.gov/quality/>.

If environmental data are to be collected and used there are three major steps involved in satisfying the QA/QC process: **1)** Sufficient time and resources will be needed to set up a Quality Management System (QMS) for proposed projects. If there is not a QMS in place, one must be developed. A QMS would be the mechanism or process for managing the quality of environmental data collection and use; **2)** For a QMS to be utilized, a Quality Management Plan (QMP) needs to be written. A QMP is the document that describes an applicant's organization or program in terms of organizational structure, policy and procedures, functional responsibilities of management and staff, lines of authority, and required interfaces for those planning, implementing, documenting, and assessing all activities conducted under the assistance agreement; and **3)** The third component to QA/QC planning is writing a project-specific Quality Assurance Project Plan (QAPP) or functional equivalent. The QAPP is the document that describes project-specific information on quality assurance, quality control, and other technical activities that must be implemented to ensure that the results of the work performed will satisfy the stated performance criteria. The QAPP must be submitted and approved by the Region (**Section VII**).

Note: Applicants are not required when submitting proposals under this announcement to verify that a QMS is in place, or provide a QMP or a QAPP. However, if environmental data is collected, verification of an applicant's QMS and documentation of QMP and QAPP will be required at the time of award. P2 grant award letters will include a deadline for submitting this information to the

applicable Region (**Section VII**).

- 3. Reporting Requirements:** Semi-annual progress reporting and a detailed final technical report are required. Semi-annual reports will summarize technical progress, planned activities for the next reporting cycle and include a summary of financial expenditures – explaining how federal and matching funds are being used. The final technical report shall be completed within 90 calendar days of the completion of the period of performance. The final technical report should include: summary of the project or activity, milestones and results achieved, and costs of the project or activity. In addition, the final technical report should discuss the problems, successes, and lessons learned from the project or activity that could help inform implementing similar project activities elsewhere. A schedule for submitting the semi-annual report will be established by the Region after the award is issued.
- 4. Disputes:** Assistance agreement competition-related disputes will be resolved in accordance with the dispute resolution procedures published in 70 FR (Federal Register) 3629, 3630 (January 26, 2005) which can be found at <http://www2.epa.gov/grants/dispute-resolution-procedures>. Copies of these procedures may also be requested by contacting the person listed in Section VII of the announcement.

D. Additional Solicitation Clauses Concerning Award Administration: Additional clauses pertain to awards made under this announcement, they include: **1)** Data Access and Information Release, **2)** Final Application Submission, **3)** Subaward and Executive Compensation Reporting, **4)** Unliquidated Obligations, **5)** Website References, **6)** Unfair Competitive Advantage, **7)** the Exchange Network, **8)** Copyrights, **9)** Confidentiality Statements, **10)** Conflict of Interest, and **11)** Mandatory Disclosures; all of which can be found at [Grant Solicitation Clauses](#). These clauses are important and applicants must review them when preparing proposals for this announcement. If you are unable to access the clauses electronically using the website above, please contact the applicable Region (**Section VII**) to obtain the information.

VII. Agency Contacts:

EPA Region 1 CT, MA, ME, NH, RI, VT	Lee Fiske U.S. EPA Region 1 5 Post Office Square, Suite 100 (OES04-1) Boston, MA 02109-3912 Phone: 617-918-1847 Email: fiske.lee@epa.gov
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EPA Region 2 NJ, NY, PR, VI	Alex Peck U.S. EPA Region 2 290 Broadway, 25th Floor (PSPMMB) New York, NY 10007-1866 Phone: 212-637-3758 Email address: peck.alex@epa.gov
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EPA Region 3
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APPENDIX A

NEA Project Examples

1. Climate Change Mitigation/Prevention of Greenhouse Gas Emissions: The goal is to implement P2 projects that are specifically designed and targeted to achieve significant and measureable reductions of greenhouse gas (GHG) emissions and/or energy efficiency through technical assistance to businesses.

NEA project examples - under this national emphasis area, technical assistance/training to businesses may include, but is not limited to:

- Reducing fuel and electrical consumption due to transportation, processing, refrigeration, compressed air, pumping, HVAC, lighting, water usage, etc.
- Identifying and implementing renewable energy opportunities.
- Reducing amounts of chemicals and materials to prevent GHG emissions associated with manufacturing, transporting, disposing, harvesting and mining of raw materials or products.
- Implementing the [Economy, Energy and Environment \(E3\)](#) framework to reduce GHG emissions through process efficiency and/or materials/chemical substitution.
- Offering training and other assistance to businesses and technical assistance providers to identify, implement and measure [Green Chemistry](#) solutions to reduce GHG emissions. Such as transitioning from higher Global Warming Potential (GWPs) chemicals to lower GWP chemicals (e.g., switching from solvents such as TCE and methylene chloride to water-based or safer cleaners and degreasers, and switching to more benign gases for cleaning and refrigeration) and measuring the change in greenhouse gas emissions resulting from this transition.

2. Food Manufacturing and Processing: Implement pollution prevention projects that support more sustainable food manufacturing and processing resulting in reduced greenhouse gas emissions, water usage, hazardous materials generation and use, and/or business costs.

NEA project examples - under this national emphasis area, technical assistance/training to businesses may include, but is not limited to:

- Implementing and measuring water conservation techniques (e.g., use of high volume, low pressure washing systems that reuse water; implement alternative practices to minimize loadings to wastewater systems, focusing on managing production times to optimize cleaning and reduce water usage, possibly by extending operating times between cleanings, etc.)
- Implementing and measuring reduction of energy use and energy efficiency at a facility or in the supply/transportation chain to and from a facility.

- Implementing and measuring [Green Chemistry](#) solutions (e.g., reduce quantity and toxicity of cleaning products or food processing chemicals, developing projects that identify and find alternative chemicals or procedures for cleaning equipment and the building space, in particular alternatives to Clean-in-Place chemicals and practices, developing environment-friendly food grade lubricants, cleaners, and materials used in equipment in contact with food, etc.)
- Implementing and measuring reduced air emissions and water discharges (e.g., steps to prevent ammonia refrigeration leaks and other accidental releases, developing refrigerant alternatives that are of low toxicity and low global warming potential, etc.)
- Establishing food-manufacturing roundtables to exchange information, ideas, and technology information among food manufacturers and that incorporate follow-up measures to document P2 practices that result from the information exchanged.
- Focusing [Economy, Energy and Environment \(E3\)](#) assessments on source reduction of food manufacturing and processing wastes at one facility or at multiple points in the supply chain, leading to transferable lessons that can be applied at other facilities.
- Focusing on reduction of energy use and cost by concentrating on identifying opportunities for energy (particularly heat energy) conversion, transfer and/or storage.
- Investigating byproduct recovery and transformation to reduce emissions and other discharges.

3. State or Community Approaches to Hazardous Materials Source Reduction: Implement state or community-based approaches to hazardous materials source reduction activities that result in reduced generation and use of hazardous materials.¹¹

NEA project examples - under this national emphasis area, technical assistance/training to businesses that may include, but is not limited to:

- Assisting businesses within a community to improve material practices that reduce the use and risk of release of hazardous chemicals during a storm, flooding or other natural disaster event. (i.e., reduce stockpiling and use of non-hazardous chemicals).

Identifying and targeting businesses or sectors within environmental justice communities that use hazardous materials and providing P2 assessments and training.

¹¹ The term community as defined under this emphasis area applies to sectors, multi-organizational partnerships and encompasses the definition used under the agency's cross-agency strategy action plan on communities. For more information, click on:
<http://www.epa.gov/sites/production/files/2015-12/documents/fy16-communities-action-plan.pdf>.

- Using [Toxic Release Inventory \(TRI\)-P2 reporting](#) data to target similar businesses or operations with similar P2 opportunities in hazardous materials source reduction within local communities.
- Creating training and other assistance methods to teach businesses to identify and reduce the use of hazardous chemicals in their facilities through source reduction techniques and/or practices, (e.g., participating in [EPA's Safer Choice program](#), using Safer Choice-labeled products, or using [EPA's Safer Chemical Ingredients List](#), etc.)
- Establishing regional manufacturing roundtables to exchange information, ideas, and technology information among the manufacturers that incorporate follow-up measures to document P2 practices that result from the information exchanged.
- Developing community-based [Economy, Energy and Environment \(E3\)](#) projects that would result in reduced generation and use of hazardous substances, pollutants, and/or contaminants and increase efficiency by manufacturers.
- Providing technical assistance to manufacturers to reduce the generation of hazardous materials through process changes included, but not limited to: [Green Engineering](#) practices, through in-process reuse of the materials, and/or through the reclamation and remanufacturing of the hazardous secondary materials to extend their useful life. This technical assistance could be targeted to assist with P2 practices at manufacturers who may use exclusions in the [2015 RCRA Definition of Solid Waste Rule](#) (as adopted by a State).
- Assisting businesses in adopting P2 practices to reduce their compliance burden under EPA or under state environmental regulations – e.g., implementing air toxics standards covering motor vehicle and miscellaneous spray coaters; eliminating use of metallic hazardous air pollutants in spray painting; providing training to spray painters in appropriate spray techniques; eliminating use of halogenated solvent degreasing by electroplaters and other firms that clean metal parts; [substituting perchloroethylene used by drycleaners](#) with wet cleaning practices, especially focusing on drycleaners co-located within residential buildings.
- Implementing and measuring [Green Chemistry](#) solutions (e.g., reduce quantity and toxicity of industrial cleaning/personal care products, deicers, etc.)

APPENDIX B

Sample Cover Page

[Grant Program Title] **FY 2016 and FY 2017 Pollution Prevention Grant Program**
[Funding Opportunity Number] **EPA-HQ-OPPT-2016-002**

[Proposal Title] **NH DES Pollution Prevention Program**

[Short Project Description – fewer than 300 characters]

The proposed project will provide on-site technical assistance to the marina sector, manage an Environmental Leadership Program for small businesses, and develop tools and workshops to assist manufacturers “green” their supply chain.

[Project funding]

Total Project Funding: \$160,000
Requested Funding: \$80,000

[Applicant’s contact information. The contact information should include a primary contact, i.e., the person responsible for implementing the grant project and if desired an administrative contact, i.e., the person responsible for submitting the grant proposal]

Jane Doe
NH DES Grants Office
New Hampshire DES
29 Hazen Drive, P.O. Box 123
Concord, NH 03302
Tel: 222-222-2222
Fax: 222-222-2222
Email: mary.doe@state.nh.us

John Doe
Pollution Prevention Program
New Hampshire DES
29 Hazen Drive, P.O. Box 95
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Email: john.doe@state.nh.us

[System for Award Management Registration]
System for Award Management Registration Date: 1/16/2016

APPENDIX C

Guidance for Addressing the Selection Criterion on Environmental Results and Measurement

This guidance is to help applicants respond to the Selection Criterion on Environmental Results and Measurement.

Environmental Results and Measurement Selection Criterion:

- a. Provide qualitative and quantitative estimates of expected outcomes and outputs of P2 grant project activities.*
- b. Provide a plan for tracking expected outcomes and outputs. For expected environmental outcomes specifically, include a plan to document results at the facility or entity level. In limited cases, EPA will consider awarding points for a credible explanation of why reporting outcomes at the facility or entity level would be too burdensome or raise confidentiality concerns which cannot be overcome.*

I. Selection Criterion on Environmental Results and Measurement: Subpart (a)

A. Directions for Estimating Expected Outputs

Outputs are work products related to an environmental goal that you expect to produce and measure quantitatively or qualitatively during the grant period.

- Estimate your expected outputs. Examples include the number of: (i) technical assistance visits/assessments; (ii) workshops, training and courses conducted; (iii) stakeholder groups involved in a process; (iv) fact sheets developed or distributed; and, (v) (the degree of) behavior change among participants.
- Briefly explain how you are estimating. State any assumptions and calculations used, such as the degree of participation and P2-practice-adoption rates for workshop participants.

B. Directions for Estimating Expected Outcomes

Outcomes are results from carrying out an environmental activity that relates to an environmental or programmatic goal.

- When estimating outcomes, address any and all of the following four EPA P2 Program outcome measures for which you expect to get actual results from implemented environmental activities.

- ✦ Reductions in pounds of hazardous material inputs and of hazardous pollutants released to air, water, and land;
- ✦ Reductions in greenhouse gas releases (measured in metric tons of carbon dioxide equivalent (MTCO₂e);
- ✦ Reductions in gallons of water used; and,
- ✦ Dollars of cost savings associated with reducing hazardous pounds, MTCO₂e and water usage.

➤ Quantification directions.

- ✦ When making quantified estimates, estimate the annual results of anticipated implementation activities in year one, and the annual results of anticipated implementation activities in year two, and add them together.
- ✦ Do not estimate expected reductions in nonhazardous inputs/wastes as a line item because EPA cannot report them (such reductions cannot be a primary purpose of a P2 grant).
- ✦ If you are converting expected *ancillary* nonhazardous pound reductions into expected GHG reductions, please make note of that. EPA's Waste Reduction Model can do the conversions. See <http://epa.gov/epawaste/conserve/tools/warm/index.html>
- ✦ Omit cost savings from expected ancillary nonhazardous pound reductions.
- ✦ EPA's P2 calculator tools are available to assist you in making pound, GHG and cost estimates. See <http://www.epa.gov/p2/pollution-prevention-tools-and-calculators>
- ✦ A table format is recommended for quantified estimates.

➤ Include a brief explanation of how you are estimating expected outcomes. It is equally adequate to say that you made an educated guess or that you used calculation assumptions.

Sample Table 1 – Estimated Annual Outputs

P2 Activity	Outputs	Behavior Changes

Sample Table 2 – Estimated Annual Environmental Outcomes (see notes below)

(a) P2 Activity	(b) Hazardous Pounds Reduced	(c) MTCO ₂ e Reduced	(d) Water Gallons Reduced	(e) Dollars saved from (b) – (d)
1.				
2.				
3.				
Total:				

Sample Table 2 notes:

- ✦ Hazardous pounds covers the total of:
 - ✓ Pounds of hazardous inputs and waste reduced: Omit non-hazardous items (packaging, paper, glass, plastics, steel, construction debris, etc.)
 - ✓ Pounds of air pollutants: Omit estimated reductions in SO_x/NO_x from utilities, due to cap and trade rules.
 - ✓ Pounds of water pollutants: Contaminants in wastewater (chemical and biochemical oxygen demand, toxics, nutrients, total suspended solids, etc.) Convert your estimate of water discharge reduction from gallons to pounds (multiply gallons by 8.34) and then divide by 10,000 to get the estimated reductions of water pollutants.
- ✦ MTCO_{2e} (metric tons of carbon dioxide equivalent): Estimated greenhouse gas (GHG) reductions go here.
- ✦ Water gallons reduced: Estimated reductions in water intake/discharge.

II. Selection Criterion on Environmental Results and Measurement: Subpart (b)

A. Directions for Planning to Track Progress

- Briefly state how you will collect results.
 - ✦ Collection approaches for outputs include voluntary surveys (by phone, mail, email or online) and testing participants voluntarily before and after for knowledge and behavior changes. Voluntary tests and surveys administered under a grant are exempt from the Paperwork Reduction Act.
 - ✦ Collection approaches for outcomes include onsite revisits, self-reported data, etc.
- Briefly state what kind of sources you plan to use for actual outcome data. Examples include metered data, self-reported statements, product specification data, and sector case study data.
- If you know, briefly state which data conversion tools you plan to use. For the tools that EPA offers, see the P2 calculator/conversion tools on pounds, GHG, and cost savings at <http://www.epa.gov/p2/pollution-prevention-tools-and-calculators>
- For projects with expected outcomes, the EPA will evaluate whether an applicant is making a commitment to correlate implementation activities to actual outcomes in a facility or entity level report by the end of the grant period.

B. For Reference: Examples of Facility and Entity Level Reports

EPA is providing the examples of results documented at the facility or entity level.

1. Technical assistance or assessment.

Table 3: Sample

(a) Entity or Facility	(b) P2 Activity Implemented	(c) Hazardous Pounds Reduced	(d) Gallons Water Saved	(e) MTCO ₂ e Reduced	(f) \$ Saved from (c) – (e)
Mid-size manufacturing facility	Technical assistance/training on resource conservation concepts (energy efficiency or water usage); plastics recycling converted to MTCO ₂ e*; saved from (c) – (e).	100,000 lbs	0	19,000	\$40,000
Farm	Offering technical assistance/training to encourage environment friendly irrigation practices or electrical efficiency measures.	0	100 million gallons	15,000	\$28,000
Adhesive manufacturer	Applying technical assistance/training on once-used solvent sold to vendor to be remanufactured.	110,000 lbs	0	0	\$45,000
Company X	Applying technical assistance/training on product reformulation/redesign (green chemistry/green engineering).	80,000 lbs.	0	0	0

**Note: Shows the desired practice of noting when implementation of nonhazardous reductions are being converted to GHG emission reductions.*

2. State Environmental Leadership or similar program with self-reporting members.

Table 4. Sample

Facility Name	Indicator	Specific Indicator	Baseline	Quantity	Cost savings	Cost savings explanation
Company X	Hazardous air emissions	Reduced VOC products used, better spray gun	100 tons	Now 64 tons; 36 ton reduction	\$50,000	Reduced products bought
Company Y	Grid electricity	Set up a timed break; shuts off process system during break.	6,500 kWh	5,900 kWh; 1,000 kWh reduction	\$500	Energy conservation
Company Z	Non-hazardous waste *	Scrap metal recycling			\$5,000	*Dealer buys scrap metal.

**Note: For programs that collect nonhazardous results, EPA needs to see nonhazardous pound reductions and associated cost savings itemized separately, so EPA can subtract them for its P2 Program reporting.*

3. Sector Initiatives. For a sector initiative, such as a hospitality certification program or similar initiative with standard elements that participating entities adopt and apply, results would document the number of facilities engaged in implementation and the model formula for calculating average sector-facility performance.
4. Pilot projects report pilot-test scale results. In a facility or entity application, results would be documented similarly to technical assistance/training results.
5. Training surveys for implementation: If training follow-up steps identify actual implementation and outcomes, whichever approach above applies would serve as the example (technical assistance/training, sector initiative, etc.).

III. Directions on Explaining Why Planning to Document Results at the Facility or Entity Level Would be Unduly Burdensome or Pose Confidentiality Concerns

In limited cases, the EPA will consider awarding points for a credible explanation of why reporting outcomes at the facility or entity level would be too burdensome or raise confidentiality concerns which cannot be overcome. The following points are relevant to EPA's consideration.

1. **Confidentiality.** EPA's P2 Program will protect the identity of any named entity and will not identify entity to any other EPA office or any other party unless it receives permission from the grantee to request the direct permission of the entity. If an applicant has a remaining concern, please state the concern and explain it clearly.
2. **Undue Burden.** If an applicant faces an undue burden in addressing this requirement, it should explain that burden in a credible way. Example: A proposed project involves a state leadership program where recurring (multiple years') results are embedded in participant self-reporting and the applicant explains the obstacle it would face in calculating the annual results from the implementation activities that occurred in the current reporting year.

APPENDIX D

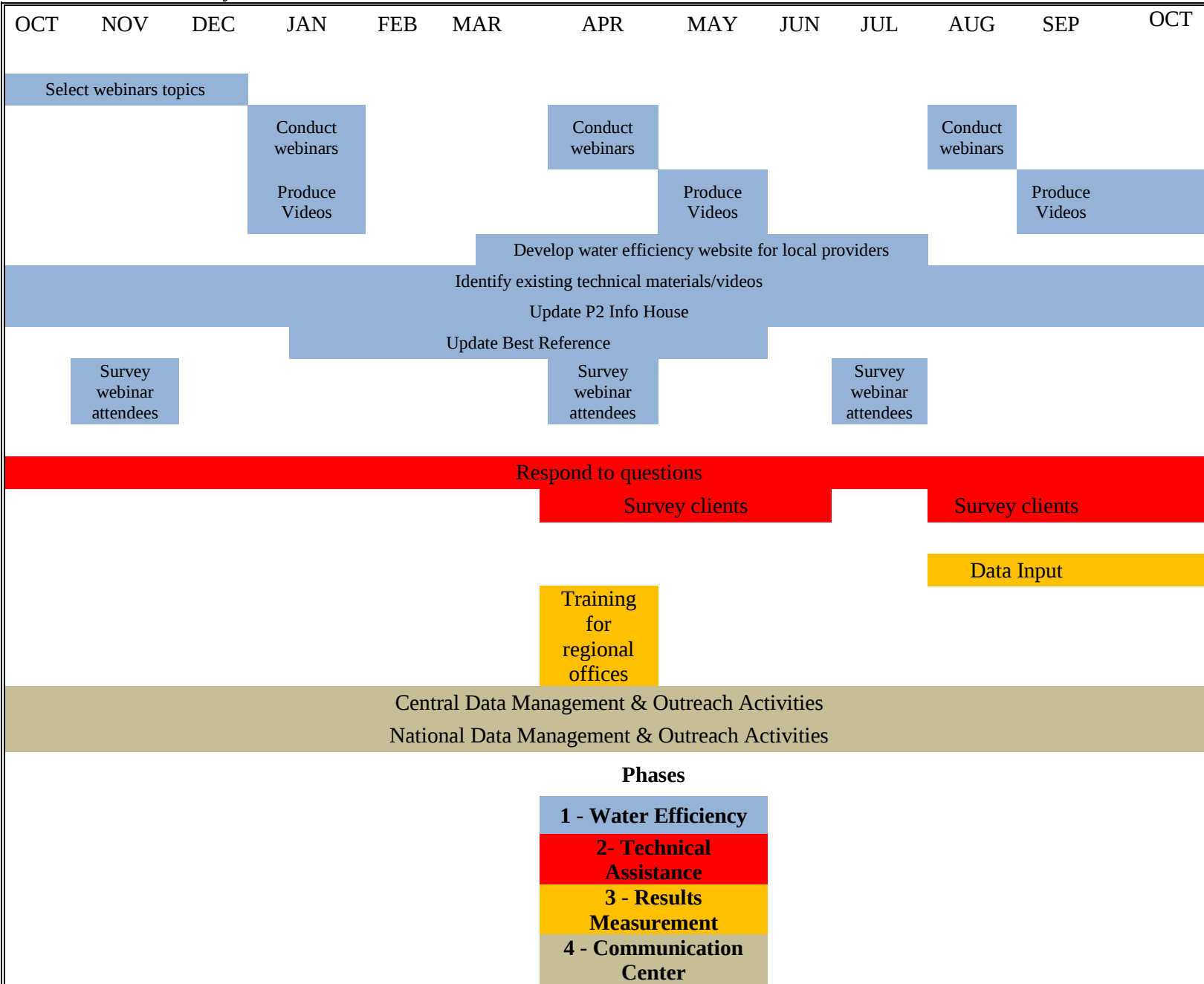
Project Timeline Samples

The following samples offer different approaches for documenting a time schedule of major project activities and milestones. Please note that timelines will need to account for two years of grant funding showing: tasks, measurement planning, data collection efforts, and data analysis and reporting. The samples that follow show one year of federally funded activity. If any of the samples are used, applicants must provide two timelines to demonstrate two years of federally funded activity.

Timeline Sample 1: Timeline for “Conserving Water in Food Process Operations” Project by State University

Phase & Key Milestones	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP
1 Water Efficiency												
Select webinars topics	X	X	X									
Conduct webinars				X			X				X	
Produce Videos				X				X				X
Develop water efficiency website for local providers					X	X	X	X	X	X		
Identify existing technical materials/videos	X	X	X	X	X	X	X	X	X	X	X	X
Update Info House	X	X	X	X	X	X	X	X	X	X	X	X
Update Best Reference			X	X	X	X	X	X				
Survey webinar attendees		X					X			X		
2 Technical Assistance												
Respond to questions	X	X	X	X	X	X	X	X	X	X	X	X
Survey clients						X	X	X	X		X	X
3 Results Measurement												
Data Input											X	X
Training for regional offices						X	X					
4 Communication Center												
Central Data Management	X	X	X	X	X	X	X	X	X	X	X	X
National Data Management	X	X	X	X	X	X	X	X	X	X	X	X

Timeline Sample 2: Timeline for “Conserving Water in Food Process Operations” Project by State University



APPENDIX E

Itemized Budget Detail Guidance and Sample

Applicants must provide estimated budget amounts for each year of funding. The budget detail allows the Region to determine if the costs are reasonable and necessary. To comply with cost sharing and matching requirements, the itemized budget must indicate the project costs paid by the applicant, EPA, and/or other partners for each year of funding. A description of object class categories and a sample budget is provided below.

Description of Object Class Categories

2 CFR 200.430 Personnel: Indicate costs for the salaries and job title of the recipient employees who will perform work directly on the project. **Personnel cost does not include** 1) costs for services contractors including consultants (Contractual), 2) employees of sub-recipients (Other), 3) personnel costs that are not directly in support of the proposed project which may be covered by the organization's indirect cost rate (Indirect), 4) participants supports costs such as costs for interns and fellows who are not employees of the recipient organization (Other).

2 CFR 200.431 Fringe Benefits: Indicate all mandated and voluntary benefits to be supplemented with the grant funds. Fringe Benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe Benefits may include 1) annual leave, 2) holiday pay, 3) health insurance, 4) retirement contributions, and 5) employer's portion of FICA Insurance.

2 CFR 200.474 Travel: Indicate the number of individuals traveling, destination of travel, number of trips, and reason for travel. Recipient's budget narrative should include the dollar amount of the expenses for transportation, lodging, subsistence, and related items. Travel for trainees and other program participants such as interns, fellows, and work group members who are not employees of the recipient are considered "participant support costs" and should be included in the "Other" budget category.

2 CFR 200.33 Equipment: Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also §§200.12 Capital assets, 200.20 Computing devices, 200.48 General purpose equipment, 200.58 Information technology systems, 200.89 Special purpose equipment, and 200.94 Supplies. It does not include rental or lease of equipment (this cost should be noted under the other category). Recipient's budget narrative should include 1) type of equipment, 2) cost of equipment; and 3) brief narrative on the intended use. Equipment includes accessories necessary to make equipment operational. Recipients should indicate in the budget narrative if their organization has established lower limits for equipment.

Note that not all funding programs allow for the purchase of equipment and some programs encourage leasing rather than purchasing equipment. If your project requires the purchase of equipment, you are encouraged to check with the Regional Pollution Prevention contact prior to

submitting your proposal to ensure that the equipment purchases are allowable.

2 CFR 200.94 Supplies: Supplies are tangible personal property other than equipment. Recipients should indicate any items, other than equipment, that will be purchased to support the project. Supplies include such items such as: 1) office supplies, 2) computing devices (e.g. laptops and tablets), 3) monitoring supplies, 4) educational or field supplies, and 5) laboratory supplies.

2 CFR 200.330 Contractual Costs: Purchases of property or services that are necessary to the project or program and are carried out by an individual or firm. Contractual costs include 1) consultants, 2) speaker fees, 3) contracts for services such as audio visual, website development, and other services necessary for the project, 4) analytical services from laboratories. Recipients should indicate any proposed contractual items that are reasonable and necessary to carry out the project's objectives. State recipients must follow the procurement procedures found at 2 CFR 200.317.

Other: Indicate general (miscellaneous) expenses necessary to carry out the objectives stated in the work plan.

Total Direct Charges: Summary of all costs associated with each line item category.

2 CFR 200.414 Indirect Costs: Organization must provide documentation of a federally approved indirect cost rate (percentage) reflective of proposed project/grant period. Applicant should indicate if organization is in negotiations with appropriate federal agency to obtain a new rate. Examples of indirect cost includes 1) insurance, 2) publication costs, 3) occasional document reproduction at self service firms (staples), 4) communication costs, 5) rental/lease of equipment or supplies, 6) participant support costs such as stipends or travel assistance for trainees, interns or non-employee work group members, 7) subawards.

Total amount of funds requested from EPA and total match: Add direct and indirect costs.

Total cost of project: Add the total amount requested from EPA and the total amount of funds provided as a match for an overall project cost.

Measurement: The category of "measurement" is not an Object Class Category; nonetheless, grant conditions require the inclusion of a short description of applicable measurement costs to complete the budget detail. A sample description has been included at the bottom of the sample itemized budget

PERSONNEL YEAR 2

	Annual Salary	FTE	Wages		Annual Salary	FTE	Wages	TOTAL
Info & Cmx Specialist	\$42,632	0.50	\$21,316	Info & Cmx Specialist	\$42,632	0.15	\$6,395	
Env. Sr. Specialist	\$44,362	0.67	\$29,723	Env. Sr. Specialist	\$44,362	0.15	\$6,654	
1 Computer Consultant III	\$50,378	0.10	\$5,038					
1 Env. Prgm. Supv. II	\$66,702	0.05	\$3,335					
				2 Env. Eng.	\$56,726	1.00	\$56,726	
				Env Program Manager	\$60,646	0.20	\$12,129	
				Env. Prgm. Supv. III	\$69,052	0.15	\$10,358	
TOTAL		1.32	\$59,412			1.65	\$92,262	\$151,674

CONTRACT YEAR 2

	Salary	FTE	Wages	Annual Salary	FTE	Total	
Management support ⁱ	\$25	780	\$19,500	\$0		\$0	
Graphic/ technical support ⁱⁱ	\$10	495	\$4,950	\$0		\$0	
			\$24,450			\$0	\$24,450
OTHER							
Webinar conference calls	\$2,000		\$2,000	\$0		\$0	\$2,000
INDIRECTⁱⁱⁱ							
		8.60%	\$5,109		8.60%	\$7,935	\$13,044
INCOME^{iv}							
	\$0		\$0	\$0		\$0	\$0
TOTAL	\$2,035						
GRAND TOTAL			\$112,109			\$123,705	\$235,814

Sample Table 2: Budget Allocation by Phase for “Conserving Water in Food Process Operations” Project by State University

Phase	Work Year 1			Total Project Funding – Year 1		
	Federal	Match	Total	Federal	Match	Total
1 Water Efficiency	0.92	1.00	1.92	\$80,000	\$40,000	\$120,000
2 Technical Assistance	0.00	0.10	0.10	\$4,109	\$10,000	\$14,109
3 Results Measurement	0.10	0.00	0.10	\$14,000	\$0	\$14,000
4 Communication Center	0.10	0.05	0.15	\$14,000	\$5,000	\$19,000
Totals	1.32	1.65	2.27	\$112,109	\$55,000	\$167,109

Phase	Work Year 2			Total Project Funding – Year 2		
	Federal	Match	Total	Federal	Match	Total
Water Efficiency	0.92	1.00	2.32	\$80,000	\$40,000	\$120,000
Technical Assistance	0.00	0.10	0.10	\$4,109	\$10,000	\$14,109
Results Measurement	0.20	0.00	0.20	\$14,000	\$0	\$14,000
Communication Center	0.20	0.05	0.35	\$14,000	\$5,000	\$19,000
Totals	1.32	1.65	2.97	\$112,109	\$55,000	\$167,109

ⁱ Contract is for project management support 15 hours per week (780 hours total) for one year.

ⁱⁱ Contract is for technical/graphic support by work-study student at 16.5 hours per week for two semesters (495 hours over 30 weeks).

ⁱⁱⁱ We have chosen not to use the authorized research rate of 62.07%, as we are not engaging in either laboratory or field research. We are using an indirect rate of 8.6% of salary.

^{iv} At this time, we do not anticipate having income. If it becomes necessary to charge for webinars, we propose that income be regarded as “addition” and may also be used to meet match, per 2 CFR 200.307.