

Responses to questions asked during the P2 Program: National Grants Webinar on March 22, 2016.

Questions from the webinar are divided into the following categories:

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3. [Eligible Applicants](#)
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 - Source Reduction Assistance grants
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Questions about whether a proposed project is appropriate for a Pollution Prevention Grant or a Source Reduction Assistance grant should be directed to EPA Regional Pollution Prevention Contact for your state. [The list of the Regional contacts is at the end of this document and on the website.](#)

Questions about the Pollution Prevention Information Network grants should be directed to [Beth Anderson](#) (anderson.beth@epa.gov) or call 202-564-8833.

1. Definitions

Please define "PPA"?

PPA refers to the "Pollution Prevention Act". In 1990, Congress passed the Pollution Prevention Act which states: "the Environmental Protection Agency must establish a source reduction program which collects and disseminates information, provides financial assistance to States, and implements the other activities...."

EPA is responsible for implementing the law passed by Congress. The law can be found online at [senate.gov](#).

What is pollution prevention?

The Pollution Prevention Act defines the term "source reduction": as any practice which—
(i) reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal; and
(ii) reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

The term, source reduction, includes equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control.

The term "source reduction" 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.

Pollution prevention, or P2, was defined by EPA (www.epa.gov/p2/pollution-prevention-law-and-policies#define) and included this definition of source reduction.

What is the definition of hazardous waste for these grants?

The P2 Program uses the term hazardous materials. The term hazardous materials is used in a broad sense to include federally or state regulated pollutants, including Clean Air Act criteria pollutants and Clean Water Act water quality criteria pollutants and conventional pollutants, but excludes items generally considered of low hazard and frequently recyclable or divertible, such as paper products, cans, iron and steel scrap and construction waste. This language can also be found in the [P2 Program's National Program Manager's Guidance FY 2016-2017](#), p.24.

Appendix C - Guidance for Addressing the Selection Criterion on Environmental Results and Measurement of the grant program's request for proposals, notes the following:

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.

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

What is Insular Area Applicant?

Insular area applicants represent the U.S. Virgin Islands, American Samoa, Guam and the Northern Mariana Islands.

Under the Pollution Prevention Grant Program, the 50 percent match requirement is waived for Insular Area Applicants that request less than \$200,000 in federal grant funding as Authorized by the Omnibus Territories Act of 1977.

How does EPA define technical assistance?

EPA's P2 Program interprets technical assistance to mean offering process improvements, training, or tools to stakeholders. Stakeholders take on different meanings depending upon the P2 Program's grant program under consideration.

2. P2 National Emphasis Areas

Should the proposal address all three National Emphasis Areas (NEAs) or is it ok to address just one?

Proposals must address one or more of the NEAs.

Would diversion of food wastes to bio digestion or composting be considered recycling or source reduction? Is renewable energy generation from food waste eligible?

Both of these opportunities, while helpful for climate change mitigation, are not the focus of this grant program. Both would focus more on the output or waste of the manufacturing plant and not on source reduction.

What definition are you using for food manufacturing?

The NEA Food Workgroup is focused on P2 outcomes in Food Processing/Manufacturing, which is described in section 311 of the NAICS code (www.bls.gov/iag/tgs/iag311.htm).

Can the grant be used to help a city implement a food composting? Citywide composting, green waste going to compost instead of landfill.

As described above, this grant opportunity would focus on waste generation and not on source reduction. Composting should not be a focus of these grants.

Where on the website were the resources on each of the NEAs?

P2 National Emphasis Areas (NEAs) www.epa.gov/p2/p2-national-emphasis-areas-neas

What is an example of a community approach to hazardous materials source reduction? (slide 7)

The following are examples of community approaches to hazardous materials source reduction:

- 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.

More examples are found in Appendix A of the FY 2016 – FY 2017 Requests for Proposals – www.epa.gov/p2/grant-programs-pollution-prevention.

Can you give an example of measurable outcomes for National Emphasis Areas (NEAs) besides pounds of hazardous material prevented?

The Program addresses four outcomes measures – each of which are measurable under the NEAs:

- 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.

3. Eligible applicants

Can you please clarify who is eligible for these grants?

Eligible applicants under the Pollution Prevention and Pollution Prevention Information Network Grant Programs include ONLY the following entities: State agencies, colleges and universities (that are instrumentalities of the states); federally-recognized tribes and intertribal consortia.

Eligible applicants under the Source Reduction Assistance Grant Program include ONLY the following entities: State agencies, local governments, city or township governments, independent school district governments, state controlled institutions of higher education, non-profit organizations (other than institutions of higher education), private institutions of higher education, community-based grassroots organizations, and federally-recognized tribes and intertribal consortia.

Would a regional planning agency be eligible to apply?

Under Pollution Prevention and Pollution Prevention Information Network Grants, if the regional planning agency serves as an instrumentality of the state then, yes, the applicant is eligible. Under the Source Reduction Assistance Grant Program, if the regional planning agency serves as an instrumentality of the state or city or township government or independent school district governments then, yes, the applicant is eligible.

If a federally-recognized tribe is applying for funds under a Performance Partnership Grant, non-federal share is reduced to 5% in some EPA grant programs, is this true with the P2 grants?

If a federally-recognized tribe receives a Pollution Prevention (P2) grant and adds the P2 grant to a Performance Partnership Grant agreement the match from the P2 grant funded activity is reduced from 50 percent to 5 percent for the first two years of the grant. If the P2 grant should run longer than

2 years a reassessment of the match will be conducted by the applicable EPA Regional Administrator to reassess if an undue hardship burden continues to exist for the tribe.

Can the P2 Grant be applied to city governments?

City governments cannot directly apply for Pollution Prevention (P2) grant funding. Only eligible applicants may apply – refer to FAQ under eligible applicants. However, city governments may partner with eligible applicants and can be indirect beneficiaries of P2 grant funding.

Are Alaska Tribal Communities eligible under this program?

If tribal communities are federally-recognized or serve in intertribal consortia they are eligible to apply for funding.

Are for-profit grassroots or backbone organizations eligible for these grants?

Community-based grassroots organizations are eligible to apply for Source Reduction Assistance grants.

4. Applying for a grant under the P2 program:

Once the RFP is out, about how long will it be before proposals are due?

EPA evaluates the timing of the submission deadline once the Request for Proposals is ready to publish on-line. Under the Pollution Prevention and Pollution Prevention Information Network Grant Programs, EPA has opted to allow applicants 60 days to submit proposals. P2 grants are due on May 9, 2016 and PPIN grants are due on May 17, 2016.

Do applicants need to submit separate budgets for year 1 and year 2?

Yes, the proposal must show how funds will be spent over the two-year period.

Is there a link to past award winners and a description to their project so we can see ideas of good grants?

Summaries of past grant awards are available on our P2 webpage: www.epa.gov/P2
<https://www.epa.gov/p2/grant-programs-pollution-prevention#summaries>

Can applicants have overlapping grants meaning that a grant from last year overlaps one year into the new one?

Yes, as long as the grant is supporting a different scope of work.

Does the match have to come from the applying organization or can it come from other partners?

The match can come from the eligible applicant or can come from partners or stakeholders that contribute cash; in-kind goods and services (such as volunteered time, photocopying and printing services, etc.); third-party contributions consistent with 2 CFR 200.306; Also, university faculty time or effort 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.

Why do the P2 and PPIN grant programs require a 50% match?

The grant authority described in the Pollution Prevention Act requires a 50% match: www.epa.gov/p2/pollution-prevention-act-1990#grants.

Is the 50 percent match for the United States Virgin Islands?

Under the Pollution Prevention Grant Program, the U.S. Virgin Islands are considered to be an insular area applicant. If the applicant requests less than \$200,000 in federal grant funding the match requirement is waived.

All proposals are considered together?

Proposals need to be submitted according the submission requirements noted for each Request for Proposals. Each Regional office considers all the proposals submitted, according to the review process described in Section V.B. in the request for proposals.

The focus is on production rather than consumption efficiencies?

Yes.

5. Specific Grant Program Questions

a) Source Reduction Assistance grants

When do you expect SRA grant RFP to be available, and do you know when the proposals will be due?

EPA anticipates the Source Reduction Assistance Request for Proposals will be issued by the end of March or early April. Please periodically check the EPA's P2 Program Grant page for updates by visiting – www.epa.gov/p2/grant-programs-pollution-prevention.

For the SRA grants, are there Regional differences?

Each year, the EPA Regions assess their participation in the Source Reduction Assistance (SRA) grant competition. For FY 2016-FY2017 grant competition, EPA Region 1 has chosen not to participate. In the anticipated SRA Request for Proposals, some EPA Regions will have regional focus areas that serve as an extension of the [P2 Program's three National Emphasis Areas](#).

For SRA proposals, are letters of support counted in the 10-page proposal limit?

No, letters of support are not counted as part of the 10-page limit.

Where is the link for the SRA grants?

The Source Reduction Assistance Request for Proposals has not been published yet. EPA anticipates it will be published in April.

b) P2 Grant

Did I correctly read that the timeline and budget are no longer included in the 10 page limit? Previously they were subject to the limit. Do you want the timelines and budget details in appendices after the 10 page limit?

Under the current grant competition the timeline and budget are not part of the 10-page limit. Timeline and budget can be considered appendices to the grant proposal.

Is in-kind match acceptable for the P2 grants?

Yes.

For the P2 grants, what is the budget limit (maximum allowed) per applicant per year?

\$180,000 dollars.

For the P2 grants (slide 26) it says the average number of grants will be 40/yr. Will those be limited per region? Are there maximum amounts that can be awarded in each region?

The average number of grants is the total combined number of anticipated grants issued by the EPA Regions. It is an approximate figure.

What kinds of certificates for businesses owners are eligible for P2 grant funding?

Providing certification seminars to businesses [e.g., ISO 14001 (environmental standards); LEAN six sigma (efficiency/quality assurance); etc.].

c) Pollution Prevention Information Network grants

The PPIN slide shows a range of awards from \$110,000 to \$220,000. Are smaller grant proposals also welcomed (e.g. under \$60K)?

Yes, grants for less than \$110,000 for two years are welcome. The range of \$110,000 to \$220,000 reflects the award amounts for grants awarded in FY 2015. The grants.gov summary has been revised: www.grants.gov/web/grants/view-opportunity.html?oppld=282347

How many cooperative agreements are issued per year for PPIN?

Eight cooperative agreements were awarded last year, however the number of agreements awarded may vary.

6. Eligible projects

Questions about the Pollution Prevention Information Network grants should be directed to [Beth Anderson](mailto:anderson.beth@epa.gov) (anderson.beth@epa.gov) or call 202-564-8833.

Questions about whether a proposed project is appropriate for a Pollution Prevention Grant or a Source Reduction Assistance grant should be directed to the EPA Regional Pollution Prevention contact for your state. Here is a list of those contacts:

www.epa.gov/p2/forms/contact-us-about-pollution-prevention#regionalcontacts

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