

Frequently Asked Questions and Answers: FY 2023 – FY 2024 Pollution Prevention-Environmental Justice Grants

This document addresses frequently asked questions and answers to help potential applicants apply for FY 23-24 P2 grant funding. Topics posed relate to the pre- and post-application phase. Periodic updates to this document will be made during the application submission period.

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GENERAL QUESTIONS

1. Overview of Announcements

1.a: *I recently heard about these new grant funding opportunities. What is pollution prevention or P2?*

Answer: Pollution Prevention (also known as P2 or source reduction) is any practice that reduces, eliminates, or prevents pollution at its source before it is created and prior to recycling, treatment or disposal. More information about pollution prevention can be found on EPA's P2 program page here: <https://www.epa.gov/p2/learn-about-pollution-prevention>.

Date Posted: 3/8/2023

1.b: *What are the new EPA P2 grant programs for FY 23-FY 24? What is the purpose of these grants?*

Answer: There are two new P2 grant programs being offered for FY 23 –FY 24:

- [P2 Grants: Environmental Justice in Communities \(EPA-I-OCSP-OPPT-FY2023-001\)](#)
- [P2 Grants: Environmental Justice through Safer and More Sustainable Products \(EPA-I-OCSP-OPPT-FY2023-002\)](#)

EPA is announcing these new grant programs to fund projects that help reduce hazardous materials and reduce risks to human health and the environment in disadvantaged communities.

Grant funding must be used to offer technical assistance (information, training, expert advice) to businesses by giving them P2 tools and resources to: (1) prevent or reduce pollutants from entering the air, water, or land, and/or (2) increase access to safer and more sustainable products in disadvantaged communities. Please refer to the grant announcements and to remaining questions and answers offered below for more information.

Date Posted: 3/8/2023

1.c: *What is the difference between the FY 23-24 EPA P2 grant programs and the FY 22-FY 23 EPA P2 grant programs?*

Answer: There are two major differences between the new P2 grant programs and the prior P2 grant programs: (1) The new grant programs must fund projects specifically designed to benefit disadvantaged communities; and (2) The new grant programs encourage applicants to do so through either by: (a) preventing pollution at business/industrial facilities or (b) increasing the supply, demand, and/or use of safer and more sustainable products.

The new programs also do not require applicants to focus on a particular National Emphasis Areas (NEAs).

Date Posted: 3/8/2023

[REVISED] 1.d: *Can I apply to both types of new grants (products-based and communities-based)?*

Answer: Applicants may apply to both grant programs. To be considered for funding under both announcements, the work described in each application should be self-contained and implementable as proposed. The work in one proposal should not be dependent on the work proposed in the other proposal, which might not be selected for funding. Applicants choosing to apply to both grant programs must apply to each grant program.

Date Posted: 5/23/2023

1.e: *Can I apply if I currently have another P2 grant?*

Answer: Current P2 grantees can apply for the FY23 P2 grant competitions. However, the scope of work must indicate new project work. EPA cannot fund the same project tasks that are currently being funded under the applicant's existing P2 grant.

Date Posted: 3/8/2023

1.f: *Does the proposed project need to address the goal and objective of EPA's strategic plan?*

Answer: Yes. As noted in the grant announcements, applicants need to describe how their project work will support the most current version of the agency's strategic plan (see Section I.I of the Communities announcement and Section I.H of the Products announcement). Describing how the project work supports the agency's goal and objective for P2 is a threshold eligibility criterion (see Section III.D of announcements).

Date Posted: 3/8/2023

1.g: *Are the new EPA P2 grant programs for FY 23-24 one-time programs, or will they be available again?*

Answer: Another round of funding opportunities for both the new FY23-24 P2 grant programs (EJ in Communities and EJ Through Safer and More Sustainable Products) is planned for FY 2025-2026.

Date Posted: 5/23/2023

1.h: *How does the EPA decide whether to issue a grant or a cooperative agreement? What is the difference between grants and cooperative agreements?*

Answer: A grant is an assistance agreement where the EPA will not have any substantial involvement in the work, a cooperative agreement is an assistance agreement where EPA will have more substantial involvement.

The determination to issue a grant or cooperative agreement happens after the application has been reviewed. Determining whether a grant or cooperative agreement is the best assistance agreement to issue may be based on the complexity of the scope of work, the skill set of the staff carrying out the work, and/or the level of funding requested. EPA will be in communication with the intended recipient to determine the appropriateness of the agreement.

Date Posted: 5/23/2023

2. Grant Competition

2.a: *How will applications be selected? What are threshold eligibility criteria and how are they used?*

Answer: All applications will be reviewed against the threshold eligibility criteria noted in Section III.D of the grant announcements. The threshold eligibility criteria are used to screen which applications are eligible to merit further review. Applications that meet all threshold eligibility criteria will be evaluated against the evaluation criteria noted in Section V.A of the grant announcements.

Date Posted: 3/8/2023

2.b: Are these competitive grant programs?

Answer: Yes. To view the grant announcements, please go to [EPA's P2 Grant Programs](#) page.

Date Posted: 3/8/2023

2.c: How many grants will be awarded?

Answer: EPA anticipates that approximately 35-50 grant awards for both programs will be selected, which may be in the range of \$100,000 to \$800,000 for projects conducted within a single state or tribe, or up to \$1.2 million for multi-state or tribal projects.

Date Posted: 3/8/2023

2.d: How much funding is available?

Answer: The total amount available is approximately \$16 million between the two grant programs to be awarded in 2023 for projects with a two-year funding period. This estimate is based on anticipated funding which is not guaranteed and may change.

Date Posted: 3/8/2023

2.e: What is the maximum amount of funding each grant can receive?

Answer: Funding amounts may range from \$100,000 - \$800,000. Large projects across multiple states, and potentially across multiple EPA Regions, may be awarded up to \$1,200,000 per grant.

Applicants are encouraged to apply for the maximum amount of funding they would like to be considered for; partial funding may be available if EPA is not able to fully fund the proposal.

Date Posted: 3/8/2023

2.f: How will the awards be funded?

Answer: The agreements will be fully funded upon initial award. Awards will not be incrementally funded.

Date Posted: 3/8/2023

2.g: *When will grantees receive funding?*

Answer: Awards are anticipated to be issued by October 31, 2023.

Date Posted: 3/8/2023

2.h: *How long does the application review process take and when will I be notified of EPA's decision?*

Answer: Applications that do not pass the threshold eligibility review (based upon the criteria noted in Section III.D of the grant announcements) will be deemed ineligible. Applicants that fall into this category will receive a letter of ineligibility within 15 calendar days upon EPA making their decision. The letter of ineligibility will explain the reason for the disqualification from competition. EPA anticipates it will notify prospective grantees of anticipated funding recommendations between 60 – 90 days from the date of application submissions. Applications that met threshold criteria but did not merit funding consideration will receive an email notification.

Official grant award notices will be issued by EPA's Grants and Interagency Agreement Management Division (GIAMD) of the Office of Grants and Debarment (OGD).

Date Posted: 3/8/2023

2.i: *Will EPA hold debriefings for applicants?*

Answer: Applicants found to be ineligible are advised to request a debriefing within 15 calendar days of receiving the ineligibility letter from EPA.

Date Posted: 3/8/2023

2.j: *Are grant awards issued under this program eligible for inclusion in PPGs?*

Answer: No. Grant awards issued under this program are ineligible for inclusion in Performance Partnership Grants (PPGs). The budget accounting that is required under the Infrastructure Investment and Jobs Act of 2021 (IIJA)-appropriated funds requires that these funds are not mixed with other types of funding appropriation, which is inconsistent with the use of PPG agreements.

Date Posted: 3/8/2023

2.k: *Will there be a set aside for Tribal projects?*

Answer: No. The grant programs will not include a funding set aside for Tribal projects.

Date Posted: 3/8/2023

2.l: *Will applications be reviewed by EPA staff, outside experts/advisors, or combination?*

Answer: The applications will be reviewed by EPA internally.

Date Posted: 5/23/2023

2.m: *Do we have to specify the names of the businesses that will receive assistance under our proposal?*

Answer: You do not have to specify the names of the businesses who will potentially receive the technical assistance in the application. However, applicants should respond to all evaluation criteria in their application narratives, including **evaluation criteria 1d**. Applicants should review Section V.A of the RFAs to understand how applicants 'Identifying Businesses

Impacting Disadvantaged Communities' and other components of your proposal will be assessed. In accordance with EPA's Assistance Agreement Competition Policy – EPA Order 5700.5A1, P2 program staff may not provide advice to applicants on how to respond to ranking criteria.

Date Posted: 5/23/2023

3. Grant Type and Grant Structure

3.a: *How is a cooperative agreement different than a grant?*

Answer: The primary difference between a grant and a cooperative agreement is the level of EPA's involvement in the project during the project's performance period.

- Grants are awards of financial assistance issued by the federal government to eligible recipients based on approved workplans. EPA will not be substantially involved in the performance of grants but will monitor and perform oversight of grant work to ensure federal funds are being used as intended and expended in a timely and efficient manner.
- Cooperative Agreements are awards that involve substantial involvement between the EPA and the selected applicant in performance of supported work. EPA will work with the grantee to negotiate precise terms and conditions relating to substantial involvement as part of the award process. The determination of whether a cooperative agreement will be awarded will be made by EPA and the grantee.

Date Posted: 3/8/2023

3.b: *What is the timeframe for grantees to carry out their project(s)?*

Answer: The project period is 2 years from date of award. If needed, applicants may propose to allocate funds to complete data collection and develop case studies in year 3.

Date Posted: 3/8/2023

[REVISED] 3.c: *Can grants be conducted at a multistate/multiregional level?*

Answer: Yes. Applicants to the two FY 23-24 P2 grant competitions may propose P2 project work that involves multiple states, federally recognized tribes or EPA regions. Multi-state or multi-tribal project work should be either developed by entities across multiple states or tribes or conducted in multiple states or tribes. The work does not need to be confined to a single EPA region. Where appropriate, the project should involve proper consultation with any relevant state or tribal entities.

Date Posted: 5/23/2023

3.d: *Can grantees include more than one project in the grant?*

Answer: Yes. Grantees can have multiple projects within the grant. Please refer to the Request for Application to see examples of major project types.

Date Posted: 3/8/2023

3.e: *Can this grant be used with several businesses, or does it have to be one specific business?*

Answer: Applications do not need to focus on any one specific business. Applicants can propose work with as many businesses as makes sense for the proposed project. Involving multiple businesses is encouraged to the extent that it creates a more impactful proposal.

Date Posted: 5/23/2023

APPLICATION ELIGIBILITY AND PROCESS QUESTIONS

4. Applicant Eligibility

4.a: *Who is eligible to apply?*

Answer: Eligible grant applicants include: 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., any agency or instrumentality of a state or tribe, including colleges and universities, and federally recognized tribes and intertribal consortia. A list of intertribal consortia can be found here: <https://www.ncai.org/tribal-directory/tribal-organizations>.

Ineligible applicants: Local/city governments, individuals, nonprofit organizations, or privately owned entities (for example, private schools, for profit/private businesses, etc.)

Date Posted: 3/8/2023

4.b: *Can entities that are not eligible to apply participate in grant-funded projects?*

Answer: Entities that are not eligible for grant funding, such as local governments, businesses, community organizations and non-profit organizations, are encouraged to partner with eligible applicants to expand the reach of the proposed work and to increase the potential human health and environmental outcomes of the funded projects. Please attend one of the [informational webinars](#) or email P2HUB@epa.gov to learn more.

Date Posted: 3/8/2023

4.c: *When is the application deadline?*

Answer: The application deadline will be approximately 90 days after the RFA release.

- P2 Grants: Environmental Justice in Communities – due June 6, 2023
- P2 Grants: Environmental Justice through Safer and More Sustainable Products – due June 20, 2023

Date Posted: 3/8/2023

4.d: *Are individuals, nonprofits, or businesses eligible to apply for P2 grant funding?*

Answer: No. EPA is not authorized to award P2 grant funding to individuals, nonprofits, or privately owned entities – e.g., private schools, profit/private-owned businesses, etc. Eligible entities for P2 grants are limited 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 and universities, federally-recognized Indian tribes that meet the requirements for treatment in a manner similar to a state as described in (40 CFR 35.663), and Intertribal Consortia that meet the requirements in (40 CFR 35.504).

Date Posted: 5/23/2023

4.e: *Are communities, counties, city governments or municipalities eligible to apply?*

Answer: No, communities and local government are not eligible grant recipients. These grants are for state and tribal entities to provide technical assistance to prevent pollution. Non-eligible applicants are encouraged to reach out to eligible applicants in their area to discuss potential partnerships.

Date Posted: 5/23/2023

4.e: Who can be a Principal Investigator?

Answer: These grants do not require a principal investigator. Eligibility is limited to states and tribes (see Question 4a for full list of eligible applicants) and does not specify a principal investigator. A state university, for instance, may require a P.I. to submit the proposal, but that is not a part of this EPA Grant application process.

Date Posted: 5/23/2023

4.g: Can one NGO partner with multiple grant applicants?

Answer: That would be allowed: An NGO could be listed as a partner on multiple applications. There is no limitation to how many partners you can have, or how many grant recipients you can partner with as an NGO. However, the work described in each application should be self-contained and implementable as proposed. The work in one proposal should not be dependent on the work proposed in the other proposal, which might not be selected for funding.

Date Posted: 5/23/2023

4.h: Why aren't cities and local government eligible to apply?

Answer: The grant program is authorized through the Pollution Prevention Act. In that statutory authority, we are directed to award these grants to state entities, federally recognized tribes and intertribal consortia. Those are the guardrails that are provided within the statute, and the grant program has to adhere to those terms.

Date Posted: 5/23/2023

4.i: How does EPA define a state or state entity?

Answer: Under our grant regulations, "State means any state of the United States, the District of Columbia, the Commonwealth of Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, and any agency or instrumentality thereof **exclusive of local governments.**" 2 CFR 200.90.

Local government, defined at, 2 CFR 200.64 means any unit of government within a state, including a: County, Borough, Municipality, City, Town, Township, Parish, Local public authority (including any public housing agency under the United States Housing Act of 1937), Special district, School district, Intrastate district, Council of governments (whether or not incorporated as a nonprofit corporation under state law), and any other agency or instrumentality of a multi-, regional, or intra-state or local government.

Date Posted: 5/23/2023

4.j: *Can multiple departments within the same entity apply to these funding opportunities?*

Answer: Applicants may submit multiple proposals to each funding opportunity. While we may consider multiple applications from the same entity, the work described in each application should be self-contained and implementable as proposed. The work in one proposal should not be dependent on the work proposed in the other proposal, which might not be selected for funding. This is true for both multiple applications across FONs as well as applications to the same FON.

Date Posted: 5/23/2023

4.k: *Are historically black colleges and universities eligible to apply?*

Answer: Historically black colleges and universities could be eligible to apply if they are state universities or entities. EPA strongly encourages minority serving institutions (MSIs) that meet the eligibility criteria to apply for these grants. Universities that are not eligible applicants could partner on these grants with eligible applicants.

Date Posted: 5/23/2023

4.l: *Can an organization submit more than one application and if so, do we need to select one person to submit both via grants.gov?*

Answer: Yes, an applicant can submit more than one application. However, the work described in each application should be self-contained and implementable as proposed. The work in one proposal should not be dependent on the work proposed in the other proposal, which might not be selected for funding.

The person submitting an application must be assigned as the Authorized Organization Representative (AOR). One organization can have more than one AOR.

Date Posted: 5/23/2023

5. Application Process

5.a: *What do I need to do before submitting an application?*

Answer: You will need to have or establish a SAM.gov registration and obtain a Unique Entity ID (UEI). Then you will submit your application through [Grants.gov](#).

Date Posted: 3/8/2023

5.b: *Do I need a Sam.gov registration?*

Answer: Organizations applying to this funding opportunity must have an active [SAM.gov](#) registration. If you have never done business with the Federal Government, you will need to first register your organization in [SAM.gov](#). Within [SAM.gov](#) you will create an account using login.gov to complete your [SAM.gov](#) registration.

Date Posted: 3/8/2023

5.c: *How do I get a UEI?*

Answer: You will obtain an UEI through your [SAM.gov](#) registration.

Please note that [SAM.gov](#) registration is different than obtaining an UEI only. Obtaining an UEI only validates your organization's legal business name and address. Please review the Appendix E of grant announcements for further instruction.

Date Posted: 3/8/2023

5.d: Do I need to apply through Grants.gov?

Answer: Generally, applicants will need to apply through Grants.gov. In order to apply through [Grants.gov](https://www.grants.gov), applicants will need to set up an account. (See NOTE below). The registration process for applying through [Grants.gov](https://www.grants.gov) **may take a month or more to complete. Please register early.** The electronic submission of your application must be made by the Authorized Organizational Representative (AOR) of the organization who is registered with Grants.gov and is authorized to sign applications for federal funding assistance. See Section IV and Appendix E of announcements for more information.

NOTE: In limited exceptions the agency may consider applications not submitted through [Grants.gov](https://www.grants.gov). These limited exceptions are ONLY permitted for applicants who have limited or no Internet access. To be considered for this exception, applicants must submit a waiver to EPA requesting for their application to be considered through an alternative submission method. For more information see **Appendix E** of grant announcements.

Date Posted: 3/8/2023

5.e: What is included in the 15-page limit? Are explanations of budget plan costs (aka budget description) and project milestones (aka timeline) included in the 15-page limit?

Answer: The 15-page limit includes the:

- project narrative,
- cover page,
- budget description (not table) and
- timeline.

The project narrative cannot exceed 15 single-spaced pages, with a minimum font size of 11.5. Any pages submitted in excess of the page limit will not be reviewed. Please see Section IV.D of the grant announcements for instructions on what to include in the project narrative.

NOT INCLUDED in the 15-page limit:

- mandatory application forms,
- budget table,
- letters of support, and
- staff resumes

The budget table, letters of support and staff resumes should be uploaded as separate documents using the “Other Attachment Form” as provided in the Grants.gov Workspace grant application submission platform.

Date Posted: 3/8/2023

PROJECT WORK QUESTIONS

6. Eligible Projects and Scope of Work

6.a: Do projects need to address P2?

Answer: Yes. For projects to be considered for P2 grant funding they must address pollution prevention. More information may be found on EPA’s Grant Programs P2 page here: <https://www.epa.gov/p2/grant-programs-pollution-prevention>.

Date Posted: 3/8/2023

[REVISED] 6.b: *Are grantees limited to working with U.S.-based businesses?*

Answer: Grantees can work with businesses that are located in the U.S. and its territories, regardless of whether the parent company is U.S.-based or foreign-based. The proposed work needs to be within the United States. The grants are not for work to be done internationally.

Date Posted: 5/23/2023

[REVISED] 6.c: *What types of projects are not considered P2?*

Answer: Recycling of discarded materials, waste clean-up, disposal activities, managing or processing of non-hazardous solid waste (e.g., paper/cardboard, glass, plastics, etc.), and lean manufacturing activities that do not involve reductions in the use/release of hazardous substances, pollutants, contaminants, greenhouse gas releases or water use would not be considered P2. If any of these activities represent more than a small and ancillary part of the proposed work, EPA will not consider the application for an award. For assistance with recycling of discarded materials, waste clean-up, disposal and management or processing of non-hazardous solid waste activities, please refer to EPA's Reduce, Reuse, Recycle website.

Addressing soil contamination or other clean up or remediation activities would not be pollution prevention. The practice of pollution prevention must involve reducing the amount of a hazardous substance, pollutant or contaminant entering a waste stream, or that gets released into the environment, including pollution and emissions. These pollution prevention activities must be addressed prior to recycling of discarded material treatment or disposal.

Date Posted: 5/23/2023

6.d: *What is pollution prevention? What types of projects are considered P2?*

Answer: A project could be pollution prevention if it results in the conservation of resources or reduces the use or release of hazardous materials prior to recycling, treatment or disposal. The PPA, section 6603(5)(A), defines source reduction, also called pollution prevention or P2, as any practice which 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 of discarded material, treatment, or disposal; and reduces the hazards to public health and the environment associated with the release of those substances, pollutants, or contaminants. EPA has also interpreted P2 to include practices that may protect natural resources through conservation methods, or in-process recycling (i.e., process improvements to reuse materials within the same business in the production process). Reducing the amount of pollution in the environment means producing less waste to control, treat, or dispose. Less pollution means fewer hazards posed to public health and the environment.

P2 practices may involve but are not limited to: making equipment or technology modifications to reduce the amount of chemicals used or released into the environment, using environmentally preferable materials to reduce or eliminate the use of raw materials or more hazardous chemicals, making process or procedure modifications to conserve energy or natural resources, reformulating or redesigning products to reduce or eliminate hazardous materials or pollutants, retooling/retrofitting (accessorizing) equipment or improving control to reduce the likelihood of the release of pollutants.

Note: The program has developed grant project examples for applicants to reference to consider the type of projects that may be implemented. The examples may be found in Appendix A of the grant announcements. The examples provided in Appendix A are not intended to represent an exhaustive list of possible P2 projects, and the primary focus of the proposal must be providing technical assistance (e.g., information, training, expert advice) to businesses on P2 practices, and should include an explanation of how the proposed technical

assistance will benefit disadvantaged communities. See Section III.D. of the funding opportunity announcements for additional information

If you are unsure whether your project would qualify as P2, please contact the pollution prevention Agency Contacts listed in Section VII of the RFAs to clarify.

Date Posted: 5/23/2023

6.e: *Can I include an activity that is not P2 in this application?*

If any activity that is not pollution prevention represents more than a small and ancillary part of the proposed project, EPA will not consider the application for an award.

Date Posted: 5/23/2023

6.f: *How much of the proposed work can be assessing contamination, assessing P2 opportunities or feasibility, or R&D?*

Answer: Assessing contamination, assessing P2 opportunities or feasibility or research costs can be within the scope of the grant provided they are necessary components of the work needed to provide businesses with P2 technical assistance and addressing human health and environmental concerns in disadvantaged communities. Assessment, feasibility, or research without a connection to supporting P2 in businesses, would not be an eligible technical assistance activity.

Date Posted: 5/23/2023

6.g: *Are leadership and recognition programs eligible technical assistance activities?*

Answer: Providing awards or certifications to businesses which recognize the adoption of P2 practices, could be considered P2 technical assistance ***provided these programs are driving the adoption of newly implemented P2 practices as a result of P2 technical assistance provided under the grant.***

Date Posted: 5/23/2023

6.h: *Would a grant application be considered that proposes technical assistance to reduce elevated levels of indoor gas radon?*

Answer: A project focusing on reducing exposure to naturally occurring radon would be considered remediation, and not an eligible pollution prevention activity. Adjusted construction practices that mediate indoor buildup of radon, but do not reduce the amount of radon released, would not be considered source reduction.

Grant funding must be used to offer technical assistance (information, training, expert advice) to businesses by giving them P2 tools and resources to prevent or reduce pollutants from entering the air, water, or land. Interested applicants are encouraged to review [EPA's State and Tribal Indoor Radon Grants \(SIRG\) Program and Resources](#).

Date Posted: 5/23/2023

6.i: *Are water quality projects P2?*

Answer: Water quality projects could be considered P2, as long as the pollution prevention connection is being made, and the pollution prevention technical assistance is being provided to businesses.

Date Posted: 5/23/2023

6.j: *Are issues like land use (e.g. green zones, brownfield remediation, etc.) considered pollution prevention? How about work to address oil and gas drilling in vulnerable neighborhoods?*

Answer: Pollution Prevention grants need to focus on how to reduce (not relocate or remediate) pollution. Pollution prevention is any practice which reduces the amount of any hazardous

substance, pollutant or contaminant, entering any waste stream, or otherwise released into the environment prior to recycling of discarded material, treatment or disposal. Instead of remediation, this funding opportunity is asking applicants to go a little bit further back on the chain, preventing it before the contamination occurs.

Applicants interested in remediation are encouraged to review EPA's other grant programs, including EPA's Brownfields Program.

Date Posted: 5/23/2023

6.k: *Could a project to reduce a smell that is impacting a community be considered P2?*

Answer: The majority of the activity proposed must be pollution prevention. Non-pollution preventing activities can be an ancillary part of your grant but cannot be a focus of your grant. For smell reduction projects to be considered P2, the smell would need to be directly related to the use or release of a hazardous material, or other activity that has been defined as within the scope of pollution prevention. If the smell is unrelated to the use or release of a hazardous material or other polluting activity, smell reduction projects would not be considered P2.

Date Posted: 5/23/2023

6.l: *What would be considered a business?*

Answer: For the purposes of this announcement, the term "businesses" may represent for-profit or not-for-profit entities (as defined in 2 CFR 200.1). A "business" could also include certain public service entities that involve a fee for service like public hospitals or healthcare facilities, public colleges or universities, childcare centers, and water or wastewater treatment plants.

Date Posted: 5/23/2023

6.m: *Would a school be a business?*

If they are a for-profit, not-for-profit, or a public service entity that involves a fee for service, then they could be considered businesses. This may exclude public primary and secondary schools but could include contracted services at those schools (for example: cafeteria services, janitorial services, IT services etc.).

Date Posted: 5/23/2023

6.n: *What is in-process recycling? Is it considered P2?*

Answer: EPA's P2 Program defines "in-process" recycling to mean the act of re-using a material within the same business or facility during the production process. EPA has interpreted P2 to include practices that may protect natural resources through in-process recycling.

Date Posted: 5/23/2023

6.o: *Are reclaimed materials eligible for P2?*

Answer: Proposed projects which focus on providing technical assistance to businesses on establishing a recycling or reclamation program would not be considered source reduction and would be considered out of scope for the P2 Grants. However, advising businesses to substitute the use of virgin materials with recycled or reclaimed materials, may be considered P2 and a fundable activity under this grant.

Date Posted: 5/23/2023

6.p: *Would agricultural businesses be eligible to receive technical assistance under these opportunities? Do these grants need to focus on providing technical assistance to a specific industry or sector?*

Answer: There are no focus sectors under these funding opportunities, agricultural businesses as well as businesses working in other sectors would be eligible to receive technical assistance under this grant.

Date Posted: 5/23/2023

6.q: Are electrification activities considered pollution prevention?

Answer: EPA is announcing these new grant programs to fund projects that help prevent pollution and reduce risks to human health and the environment in disadvantaged communities. Electrification could be considered a pollution prevention activity if it results in conservation of resources or reduces the use or release of hazardous materials prior to recycling, treatment or disposal (for example, increasing the energy efficiency of a business, and thereby contributing to the P2 outcome of reducing greenhouse gas emissions).

Date Posted: 5/23/2023

6.r: Is plastics reduction P2?

Answer: Part of the goal of FY 2023 – FY 2024 Pollution Prevention Grants: Environmental Justice Through Safer and More Sustainable Products funding opportunity is to increase the supply, demand, and use of safer and more sustainable products. As exemplified in Project Example #10 (A-6 on page 35 of the RFA), this may include providing technical assistance to businesses to help them reduce or eliminate the use of single-use plastics in their operations or the products they manufacture.

Date Posted: 5/23/2023

6.s: Is waste reduction an eligible P2 area under this grant?

Answer: Waste reduction activities could be eligible for this funding opportunity if it they are a form of P2/source reduction. Pollution prevention, or source reduction, involves taking actions to reduce water, energy, material use, wastewater generation and other pollutants or contaminants that otherwise get released into the environment – all prior to out-of-process recycling, reclamation, treatment or disposal. The primary focus of the proposal must be providing technical assistance (e.g., information, training, expert advice) to businesses on P2 practices, including an explanation of how the proposed technical assistance will help the identified disadvantaged community. See Section III.D. For additional information.

Date Posted: 5/23/2023

6.t: Can PFAS reduction be an eligible P2 activity under this grant?

Answer: A PFAS reduction project could be pollution prevention if it results in the conservation of resources or reduces the use or release of hazardous materials prior to recycling, treatment or disposal. Applicants should keep in mind that for a project to be eligible it must be P2 and provide technical assistance to businesses (as well as meeting all other threshold criteria in Section III of the RFA). There are several examples of P2 projects that may include PFAS reduction in the FY23-24 Products RFA:

- **Project Example #5:** Work with property management companies to encourage the replacement of carpet and flooring materials with Cradle-to-Cradle certification, reducing potential exposure to several indoor air quality hazards that may be contained within and released by noncertified materials including PFAS chemicals.
- **Project Example #10:** Accelerate substitution of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in food contact materials (e.g., utensils, wrapping film, paper coatings, plastic containers treated with PFAS, compostable food ware, etc.).

Date Posted: 5/23/2023

6.u: *Can “green” foods and beverages be considered products under the P2 program?*

Answer: Green foods and beverages *could* be considered eligible products for this funding opportunity if they involve P2/source reduction. Pollution prevention, or source reduction can include taking actions to reduce water, energy, material use, wastewater generation and other pollutants or contaminants that otherwise get released into the environment – all prior to recycling, treatment or disposal.

Green foods and beverages could be considered P2 if they result in conservation of resources or reduce the use or release of hazardous materials. If an applicant is proposing green foods or beverages as a P2 project, there should be a clear explanation for how the food or beverage is safer than the product that would have otherwise been produced and purchased. For this funding opportunity, a proposal to increase the availability and use of safer and sustainable products should decrease harmful chemical exposures and impacts on human health and the environment in disadvantaged communities

The primary focus of the proposal must include providing technical assistance (e.g., information, training, expert advice) to businesses on P2 practices, and an explanation of how the technical assistance being proposed will help the identified disadvantaged community. See Section III.D of the [grant announcement](#) for more information on threshold requirements.

Some examples of pollution prevention in the food and beverage sector may include:

- Implementation of Integrated Pest Management (IPM) to reduce pesticide exposures
- Reducing Packaging or Substituting away from hazardous materials: Accelerate substitution of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in food contact materials (e.g., utensils, wrapping film, paper coatings, plastic containers treated with PFAS, compostable food ware, etc.)

Using less water or energy in production of the food or beverage

Date Posted: 5/23/2023

6.v: *Where can I find examples of projects that might be funded under this funding opportunity? Where are the Appendixes the RFA mentions?*

Answer: The program has developed grant project examples for applicants to reference to help them consider the type of projects that could be implemented. The examples may be found in Appendix A of the grant announcements. NOTE: The examples provided in Appendix A are not intended to represent an exhaustive list of possible P2 projects. This begins on page **A-1** , or page 31 of the [Products RFA PDF](#) and page 30 of the [Communities RFA PDF](#). The [P2 Grant Summaries](#) page shares summaries of projects funded under previous funding opportunities.

Date Posted: 5/23/2023

7. Environmental Justice Project Requirement

7.a: *What is environmental justice? How is it relevant to these grants?*

Answer: EPA defines environmental justice (EJ) as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

EPA views these grants as a component of the Biden Administration [Justice40](#) Initiative, which is designed to assure that “40 percent of the overall benefits of certain Federal investments flow to disadvantaged communities that are marginalized, underserved and overburdened by pollution.” To address EJ and meet the goals of the Justice40 Initiative, EPA is issuing this grant solicitation requesting applications for P2 projects that address environmental or public health concerns in disadvantaged communities.

Date Posted: 3/8/2023

7.b: *What is a disadvantaged community and what tools could be used to determine if a project would impact disadvantaged communities?*

Answer: Disadvantaged communities are communities that are marginalized, underserved, and overburdened by pollution can be identified through various tools, such as the Climate and Economic Justice Screening Tool, and through Supplemental Indexes in EPA’s EJ Screen, and the P2-EJ Facility Mapping Tool (more about these tools can be found below).

For the purposes of this grant, a community can be characterized by a particular geographic area and/or by the relationships among members with similar interests and can be characterized as part of a broader national or regional community where organizations can be focused on the needs of urban, rural, and/or tribal areas, workers, displaced workers, children with high levels of lead, asthmatics, subsistence fishers, and other similar groups.

Disadvantaged communities can be identified through [The Climate and Economic Justice Screening Tool \(CEJST\)](#), which is a geospatial mapping tool developed by CEQ and using Supplemental Indexes available in both: The EPA’s [EJScreen](#) tool, which is a tool that combines environmental and socioeconomic indicators in maps and reports; and the [P2 EJ Facility Mapping Tool](#), which allows users to identify industrial businesses located in or adjacent to US Census tracts that meet the EJ socioeconomic indicators featured in EJScreen and the P2-EJ Facility Mapping Tool.

Applicants may use other approaches and demographic indicators for identifying disadvantaged communities that may be appropriate for their state but must specify those approaches in their grant applications.

Date Posted: 3/8/2023

7.c: *What kinds of projects will EPA look to fund that will result in P2 benefits for disadvantaged communities?*

Answer: The program anticipates funding projects that address human health and/or environmental improvements in disadvantaged communities, which may include reducing emissions, reducing use of hazardous materials, reducing exposure to hazardous industrial processes/by-products, and reducing exposure to products containing ingredients with potential health impact.

Date Posted: 3/8/2023

7.d: *Are applicants required to focus on environmental justice (EJ)?*

Answer: Yes. EJ is a threshold eligibility criterion for these two grant competitions. All applicants **must** describe how the proposed project will identify disadvantaged communities and how the project will address human health and environmental concerns in those communities. Applications that do not address this focus area will not be considered for funding.

Date Posted: 3/8/2023

7.e: *What projects are considered P2 with an EJ focus?*

Answer: P2 projects can have an EJ focus by working to prevent pollution that impacts disadvantaged communities. Note: The program has developed grant project examples for applicants to reference to help them consider the type of projects that could be implemented. The examples may be found in Appendix A of the grant announcements. **NOTE: The examples provided in Appendix A are not intended to represent an exhaustive list of possible P2 projects.**

Date Posted: 3/8/2023

7.f: *Does a disadvantaged community need to be defined geographically? How can it be defined?*

Answer: No, communities do not need to be defined geographically and could focus on workers disproportionately affected by pollution through on the job exposure or other relationships among members with similar interests. See 7.b for a full definition of disadvantaged communities and an explanation of tools that can be used to identify communities. In their proposals, P2 applicants should describe the methodology and criteria they intend to use to identify the businesses with public health and environmental impacts on disadvantaged communities. If applicants use a methodology that is not identified in Section I, the applicant should clearly describe how disadvantaged communities are being defined and their methodology for identifying those communities.

NOTE: Applications from federally recognized tribes and intertribal consortia do not need to demonstrate a focus on disadvantaged communities but will need to identify how the projects will have public health and environmental impacts on the tribe.

Date Posted: 5/23/2023

7.g: *Would reducing GHG emissions at a business in a disadvantaged community be an eligible project?*

Answer: Reducing GHG emissions would be an eligible P2 activity, but to be considered under this funding opportunity, all applicants will also need to describe how the project being proposed will identify disadvantaged communities as described in Section I.F and how the project will address human health and environmental concerns in those communities. Applicants that pass all threshold criteria will still need to score well on the merit evaluation criteria outlined in Section V of the announcements to be selected for an award. In accordance with EPA's Assistance Agreement Competition Policy – EPA Order 5700.5A1, P2 program staff may not provide advice to applicants on how to respond to the ranking criteria.

Applicants are required to estimate and provide a comprehensive plan for gathering data and reporting the outcomes from the P2 technical assistance provided. If you are only proposing GHG emissions reductions, that should be provided as annual reductions in metric tons of CO2 equivalent. If your proposal does not include a reduction in pounds of hazardous materials used/released, please enter zero for that planned outcome, **do not double count CO2 equivalent emissions reductions under this outcome.**

Date Posted: 5/23/2023

7.h: *How are disadvantaged communities identified?*

Answer: The identification of disadvantaged communities is left to some extent to the applicant; an approach is not prescribed in the RFA. Applicants should add their rationale and methodology in their application.

Date Posted: 5/23/2023

7.i: *Does the disadvantaged community your project benefits need to be a formal partner in the project?*

Answer: Formal partnerships with disadvantaged communities is not a threshold criterion, so it is not a requirement for these grant programs. However, under merit evaluation criterion 1.e 'Engagement of Disadvantaged Communities,' eligible applications will be scored on the quality and extent to which the project narrative describes how the applicant intends to engage disadvantaged communities that are expected to benefit from technical assistance provided to businesses.

Date Posted: 5/23/2023

7.j: *Can the grant provide funding to an eligible entity not in a disadvantaged area if the benefit accrues in the disadvantaged area?*

Answer: A disadvantaged community does not need to be identified geographically. A threshold requirement for applications to be evaluated under this opportunity is "Applications must describe how the project being proposed will identify disadvantaged communities as described in Section I.F and how the project will address human health and environmental concerns in those communities." Applicants can see Section III.D of the Communities and Products RFAs for more information on threshold criteria. NOTE: Applications from federally recognized tribes and intertribal consortia will not need to demonstrate a focus on disadvantaged communities but will need to demonstrate how the project will improve human health and the environment for the tribe.

Date Posted: 5/23/2023

8. P2 Grants: EJ Through Safer and More Sustainable Products

(FON: EPA-I-OCSP-OPPT-FY2023-002)

The following questions and answers in Section 8 ONLY applies to the "Safer and More Sustainable Products" grant announcement.

8.a: *What is the goal of the grant program?*

Answer: The goal of this grant opportunity is to address environmental justice by providing P2 technical assistance to businesses (e.g., information, training, expert advice) to improve human health and the environment in disadvantaged communities by increasing the supply, demand

and use of safer and more sustainable products, such as those that are certified by EPA's [Safer Choice](#) Program, or those that conform to [EPA's Recommendations for Specifications, Standards and Ecolabels for Federal Purchasing \(EPA Recommendations\)](#).

Date Posted: 3/8/2023

8.b: What outputs and outcomes are required for the EJ Products P2 grants?

Answer: Applicants must estimate and provide a comprehensive plan for gathering and reporting the following outcomes based on the type of business provided technical assistance:

For manufacturers, report the following 7 outcomes in disadvantaged communities: 1) The number of products reformulated or redesigned, 2) Increase in sales for safer or more sustainable products, 3) Number of products that are newly certified to a safer or sustainable standard or ecolabel, or 4) number of products the manufacturer is actively seeking to certify, 5) Increase in production volume of safer or more sustainable products sold, 6) Number of manufacturers agreeing to new advertising or outreach and 7) Number of safer and more sustainable products adopted for use by manufacturers.

For distributors or retailers, report the following 5 outcomes in disadvantaged communities: 1) Increase in the number of safer or more sustainable products sold, 2) Increase in shelf space available to sell safer and more sustainable products, 3) Number of retailers agreeing to new advertising, outreach or signage on safer and more sustainable products, 4) Increase in volume of sales of safer and more sustainable products to disadvantaged communities and 5) Number of safer and more sustainable products adopted for use by distributors or retailers in their operations and maintenance.

For other businesses, report the following 2 outcomes: 1) The number of safer and more sustainable products adopted for use in the business operations and maintenance, and 2) the number of other businesses adopting a green purchasing program or committing to future purchase of safer and more sustainable products.

Note: The outputs and outcomes listed above are abbreviated, please see Section I.J.2 of the announcement for the full text of these output and outcome measures and for more details on how applicants should estimate their expected outputs and outcomes in their applications.

Date Posted: 3/8/2023

8.c: *Will applicants have an advantage if they focus on Safer Choice-certified products or other EPP recommended ecolabels? Can applicants focus on products not included in the recommendations by EPA's EPP program?*

Answer: No. Applicants will not have an advantage if they focus on Safer Choice or other EPA recommended ecolabels.

It is encouraged, but not required, that projects focus on products certified by EPA's Safer Choice program or other ecolabels/standards recommended by EPA's EPP program (see www.epa.gov/greenerproducts/recommendations-specifications-standards-and-ecolabels-federal-purchasing). If projects address the supply, demand, and/or use of products that are not certified by the EPA Safer Choice Program or do not conform to the EPA Recommended Standards and Ecolabels, applicants must provide a clear rationale for why those products should be considered safer and/or more sustainable.

Date Posted: 3/8/2023

8.d: *Are applicants required to focus on specific product categories?*

Answer: No. Applicants are not required to focus on any specific product categories in their proposed projects. Keep in mind that projects must address EJ concerns through the product category/categories of focus.

Date Posted: 3/8/2023

8.e: *For this funding opportunity, can the technical assistance focus on preventing pollution in the production processes, or does the final product itself need to be safer or more sustainable?*

Answer: The focus of this funding opportunity is not only on the final product. Production and process improvement to prevent pollution would be considered part of the supply of these products and would be eligible if it meets the rest of the threshold criteria.

Date Posted: 5/23/2023

8.f: *Would reformulating a product that is already on the market be an eligible activity?*

Answer: The reformulation or redesign of a product to be safer and more sustainable for disadvantaged communities could be an eligible activity for this funding opportunity, if all other threshold criteria are met (For example, the applicant must be an eligible state or tribal entity providing technical assistance to business(es)).

Date Posted: 5/23/2023

8.g: *Would identifying or specifically suggesting sustainable products to address the pollution prevention needs of underserved communities be eligible?*

Answer: This could be eligible so long as the focus is on providing technical assistance to businesses to help increase the supply, demand, or use of safer, more sustainable products for the disadvantaged communities. Those businesses could include the manufacturers, the retailers, or any other businesses that increase access to these products.

Date Posted: 5/23/2023

8.h: *Would creating a new product be an eligible project?*

Answer: If a state or tribal entity applies, technical assistance is provided to a business, and the work benefits disadvantaged communities, an eligible project could involve the creation of a new, safer, and more sustainable product. The creation of a new, safer and more sustainable product could be an eligible project if all threshold criteria are met (See Section III.D of RFA for complete list of threshold criteria).

Date Posted: 5/23/2023

8.i: *How do you define safer or more sustainable products?*

Answer: We are encouraging folks to focus on either Safer Choice-certified products or other environmentally preferable purchasing (or EPP) recommended standards and ecolabels. You do not have to focus on either of those. If you choose to focus on other types of products, explain in your application why those products are considered safer or more sustainable.

Date Posted: 5/23/2023

9. P2 Grants: EJ In Communities

(FON: EPA-I-OCSP-OPPT-FY2023-001)

The following questions and answers in Section 9 ONLY applies to the “Communities” grant announcement.

9.a: *What is the goal of the grant program?*

Answer: The goal of this grant opportunity is to address environmental justice priorities and improve human health and the environment in disadvantaged communities by providing P2 technical assistance to businesses (e.g., information, training, expert advice) on source reduction, also known as pollution prevention (P2).

Date Posted: 3/8/2023

9.b: *What outputs and outcomes are required for the EJ in Communities P2 grants?*

Answer: Applicants will be required to estimate five outputs in their proposals: 1) The number of businesses provided technical assistance to improve human health and/or the environment in disadvantaged communities, 2) the percent of those businesses that the grantee follows up with, 3) the percent of businesses that implement at least one new P2 practice, 4) the number of case studies developed, and 5) the number of outreach activities and informational materials implemented.

Applicants must estimate and provide a comprehensive plan for gathering and reporting the following four outcomes impacting disadvantaged communities: 1) Annual reduction in pounds of hazardous materials used and of hazardous substances, pollutants and contaminants released at each business establishment, 2) Annual reductions in metric tons of carbon dioxide equivalent (MTCO₂e) at each business, 3) Annual reductions in gallons of water used at each business, and 4) The annual dollar savings associated with implementing P2 actions at each business.

These outputs and outcomes are abbreviated, please see Section I.I.2 of the announcement for the full text of these output and outcome measures and for more details on how applicants should estimate their expected outputs and outcomes in their applications.

Date Posted: 3/8/2023

ALLOWABLE USES OF FUNDING

10. Cost Share

10.a: *Is there a cost share/match requirement for this grant program?*

Answer: No. There is no cost share/match requirement for this grant program.

Date Posted: 3/8/2023

11. Donations

11.a: *Can grantees accept in-kind donations from third parties to carry out project activities (e.g., a manufacturer donates safer/more sustainable products or retail manufacturer coupons to be distributed)?*

Answer: Yes, this is considered leveraging funds and is allowable.

Date Posted: 3/8/2023

12. Equipment

12.a: *How is equipment defined?*

Answer: For purposes of these P2 grants, as defined under 2 CFR § 200.1, 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 2 CFR §200.1 for definitions of Capital assets, Computing devices, General purpose equipment, Information technology systems, Special purpose equipment, and Supplies.

Date Posted: 3/8/2023

12.b: *Can we purchase equipment using P2 grant funding?*

Answer: Equipment may be purchased with grant funding as noted in 2 CFR § 200.313, provided the equipment is integral to the grant activity (i.e., the equipment is necessary to provide technical assistance, training, or tools to businesses). Grantees may use such equipment for which it was acquired as long as needed, regardless of whether the project or program continues to receive federal funding. The recipient may also use the equipment in other activities currently or previously supported by a federal agency.

Date Posted: 3/8/2023

12.c: Is there a dollar limit on how much grant money may be used to purchase equipment?

Answer: There is not a specific programmatic dollar limit on the purchase of equipment. However, on a case-by-case basis, the program will consider the purchase and use of equipment if it deems the costs are reasonable and necessary to implement the P2 grant activity. This guidance is in accordance with 2 CFR §§ 200.403 and 200.404. In addition, equipment costs must adhere to 2 CFR § 200.313, including the provisions governing the priority for use of the equipment (2 CFR § 200.313(c)), management of the equipment (2 CFR § 200.313(d)), and disposition of the equipment (2 CFR § 200.313(e)).

The applicant's budget description and budget table should include: 1) equipment costs as a "Direct" cost under the "Equipment" category, 2) the type of equipment, 3) the equipment's intended use, and 4) accessories necessary to make equipment operational.

Applicants should also indicate in their budget description if their organization has established lower cost limits for equipment.

Equipment does not include:

1. Equipment planned to be leased/rented, including lease/purchase agreement. Costs for renting equipment is a different action and should be noted under the "Other" budget category.
2. Equipment service or maintenance contracts that are not included in the purchase price for the equipment.

These types of proposed costs should be included in the "Other" category.

Date Posted: 3/8/2023

12.d: May I share equipment funded with a P2 grant with other grantees or grant partners?

Answer: Yes. The recipient may share the equipment with other grantees or partners, provided the recipient, who purchased the equipment, adheres to 2 CFR § 200.313, including the provisions governing the priority for use of the equipment (2 CFR § 200.313(c)), management of the equipment (2 CFR § 200.313(d)), and ultimately the disposition of the equipment (2 CFR § 200.313(e)).

Date Posted: 3/8/2023

12.e: What happens to equipment funded with a P2 grant after the grant is over?

Answer: When the recipient no longer needs the equipment for the original project or program, or for other activities currently or previously supported by a federal agency, and the fair market value is less than \$5,000, the equipment may be kept, sold, or disposed of by the applicant with no further obligation by EPA. If the fair market value of the equipment is \$5,000 or more, the recipient may keep or sell the equipment at which point EPA would have the right to proceeds from the sale. The amount of compensation will be computed by calculating the percentage of federal participation in the cost of the project – this will be assessed on the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient will need to submit a formal request to EPA to state that there will not be a need for keeping the equipment. Refer to 2 CFR § 200.313. In cases where a recipient fails to take appropriate disposition actions, EPA may direct the recipient to take such actions.

Date Posted: 3/8/2023

13. Partnerships: Voluntary, Subawards and Contracts

13.a: *What does EPA consider a partnership? How can other public or private entities contribute to project activities?*

Answer: Partnerships may occur under different scenarios.

A partnership could occur through a contract, subaward or via a pass-through entity. Partnerships may also occur through a voluntary, unpaid activity. Paid partnerships through subawards, contracts or through pass-through entities (grantees who issue subawards) may be utilized in appropriate circumstances, if the program deems the costs to be reasonable and necessary. Applicants are advised to clearly and succinctly describe all partnerships (either paid or unpaid).

For additional information on subawards, see [Question 13e](#).

For additional information on contracts, see [Question 13d](#).

Date Posted: 3/8/2023

13.b: *Are we required to have partnerships to apply for the grant?*

Answer: No. Partnerships are not required but are encouraged to help implement proposed work. Partnerships should be formed with organizations that can help you reach the target audience or strengthen the applicant's ability to provide P2 technical assistance. All partnerships should be formed and conducted in a way that aligns with EPA guidance on partnerships, procurement, contracts and sub-awards.

Date Posted: 3/8/2023

13.c: *Can a private entity be a partner?*

Answer: A private entity may partner with an eligible entity to apply for grant funding. However, only the eligible entity may apply for grant funding. The private entity is not eligible to apply. The eligible entity acting as the sole applicant will be responsible for submitting the application. Applications need to be submitted based on the program and submission requirements provided in the solicitation announcement. If selected as a grant recipient, the eligible entity will be responsible for overseeing the execution and implementation of the grant work plan. The eligible entity will be responsible for negotiating with the private entity and, as appropriate, fund the private entity's participation to conduct specified work during the project period. Please refer to [Question 13d](#) for further information on serving as a contractor.

Date Posted: 3/8/2023

13.d: *May grantees hire or subaward to private consultants or private businesses?*

Answer: Private consultants and businesses are generally not eligible to serve as subrecipients (see 13e for more subaward details). Grantees may instead hire for-profit organizations or individuals through procurement contracts, and through subcontracts. See below for more details.

For Contractors – Grantees may hire for-profit firms and individual consultants as contractors provided the grantees comply with the Procurement Standards of 2 CFR Part 200 and 2 CFR Part 1500. (Subcontractors are firms or individuals hired by prime contractors). States follow their own procurement procedures for the most part as provided by 2 CFR § 200.317, but are subject to EPA's 40 CFR Part 33 Disadvantaged Business Enterprise rule. For other P2 grantees (eligible tribes, colleges, and universities), the Procurement Standards generally

require competition for purchases in excess of \$10,000, unless the recipient has an acceptable sole source justification. It is very unlikely that EPA will accept a sole source justification for products and services that are available in the commercial marketplace such as environmental consulting. Applicants are advised to not specifically name a contractor or consultant on a grant application unless that contractor has been selected in compliance with the Procurement Standards. Instead, the applicant should indicate what experience or expertise they intend to contract for to meet the objectives of the grant project. If a specific contractor is named, applicants should be able to demonstrate how securing the contractor's services will meet the Procurement Standards. EPA encourages applicants to review the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) for additional information on EPA's policies on competitive procurement by grantees.

For Subcontractors – Prime contractors may hire subcontractors.

Additional guidance on procurement contractors is available in [EPA Subaward Policy](#) Section 7.0 and Appendix A: Distinctions Between Subrecipients and Contractors of this policy. The Procurement Standards of 2 CFR Part 200 include competition requirements.

Date Posted: 3/8/2023

13.e: When can grantees make subawards?

Answer: Subawards can be made to other organizations to carry out a portion of the Federal award under terms that establish a financial assistance relationship to accomplish a public purpose that is authorized under a Federal program. Subrecipients (also referred to as subawardees) only receive reimbursement for their actual direct or approved indirect costs such that they do not “profit” from the transaction and subrecipients are subject to the same Federal requirements as the pass-through entity.

Grantees may provide financial assistance and make subawards to eligible subrecipients to carry out part of their EPA funded project, provided the grantee: (1) determines that a subaward is the appropriate funding instrument (rather than a contract); and (2) maintains oversight over the use of funds to ensure the funds are used in accordance with the applicable rules and requirements associated with the grant authority.

Eligible subrecipients (a.k.a. subawardees) include tribes, intertribal consortia, local governments, non-profit organizations, and institutions of higher education that are either state or tribal institutions or operate on a nonprofit basis.

With few exceptions, for-profit organizations/individuals are not eligible to serve as subrecipients. However, an example of an eligible for-profit subrecipient would be a manufacturing firm that receives financial assistance to adopt P2/source reduction practices at its facility and uses those funds from the project to improve its' own facility. Also, if the for-profit receives funds for its' own staff or for the operation and maintenance of contractors as well as equipment purchases supporting P2/source reduction practices then a subaward would be appropriate.

Note: If the grant recipient will only plan to subsidize the purchase and installation of the equipment then the funding transfer to the for-profit could be categorized as a participant support cost and in so doing a subaward would not be necessary.

As defined in 2 CFR § 200.1, pass-through entities are grantees who issue subawards. These entities must comply with the subrecipient monitoring and management requirements at 2 CFR §§ 200.331 through 200.333. Among other things, subrecipients must comply with the 2 CFR Part 200 and Part 1500 Procurement Standards when hiring contractors. For more information,

please refer to Grants Policy Issuance 16-01: [EPA's Subaward Policy](#) and applicable provisions of 2 CFR Part 200.

For more information, please refer to 2 CFR §§ 200.331-200.333 and [Grants Policy Issuance 16-01: EPA's Subaward Policy](#).

Date Posted: 3/8/2023

13.f: *How can we participate if we are not an eligible entity?*

Answer: Any ineligible entity is encouraged to partner with eligible entities. However, only the eligible entity may apply for grant funding. The ineligible entity is not eligible to apply. The eligible entity acting as the sole applicant will be responsible for submitting the application. Applications need to be submitted based on the program and submission requirements provided in the solicitation announcement. If selected as a grant recipient, the eligible entity will be responsible for overseeing the execution and implementation of the grant work plan. The eligible entity will be responsible to negotiate with the ineligible entity and, as appropriate, fund the ineligible entity's participation to conduct specified work during the project period. Please refer to other FAQs in '**Allowable Uses of Funding: 13. Partnerships**' for further information on serving as a contractor, subawardee or subrecipient.

While businesses are ineligible entities and cannot apply for these awards, they could be the recipients of pollution prevention technical assistance from eligible entities.

Date Posted: 5/23/2023

13.g: *Can an applicant partner with a municipality?*

Answer: Subawards can be made to other organizations to carry out a portion of the Federal award under terms that establish a financial assistance relationship to accomplish a public purpose that is authorized under a Federal program.

Date Posted: 5/23/2023

13.h: *Do subawardees need to justify indirect costs?*

Answer: The EPA Subaward policy states that for Subrecipient's Indirect Cost Rate, "The indirect cost rate may be a rate negotiated and approved by the subrecipient's cognizant Federal agency. If the subrecipient does not have a Federal indirect cost rate, the pass-through entity may negotiate an indirect cost rate with the subrecipient that complies with 2 CFR Part 200, Subpart E or use the 10% de-minimis indirect cost rate described at 2 CFR 200.414(f)."

Date Posted: 5/23/2023

14. Miscellaneous

14.a: *Can funds be used for a project that will start before the expected award date?*

Answer: Yes. EPA's regulations allow applicants to incur project costs up to 90 days before EPA officially awards the grant or cooperative agreement. If an applicant incurs costs more than 90 days before the award, the EPA Project Officer must alert the Grants Management Office and prepare a written justification to allow those incurred costs.

Date Posted: 3/8/2023

14.b: *May an applicant use P2 grant dollars to help a business client or project participant carry out a P2 project activity?*

Answer: Reasonable and necessary participant support costs for P2 implementation may be considered to the extent that widespread benefit to disadvantaged communities (beyond the business receiving the support cost) can be demonstrated.

Date Posted: 3/8/2023

14.c: *The RFA notes applications may be considered for partial funding. What is partial funding? How does it work?*

Answer: Under the P2 grant program EPA reserves the right to issue P2 grant awards that partially-fund discrete activities, portions, or phases of the grant application. If EPA does decide to partially fund an application, it will do so in a manner that will not prejudice any applicant or affect the basis upon which the application or a portion thereof will be evaluated or selected for an award.

Date Posted: 3/8/2023

14.d: *Can grant funds be used to support college or university student tuition and student trainee fees?*

Answer: Under these grant programs, EPA may consider grant dollars to be used toward student tuition and training fees. Costs must be reasonable and necessary for the performance of the P2 project activity and will be considered on a case-by-case basis.

Date Posted: 3/8/2023

14.e: *What should the start date on our project proposal be?*

Answer: Applicants should plan to start their project work in fall of 2023. Awards are expected to be selected by September 31, 2023 and issued by December 31, 2023. EPA's regulations allow applicants to incur project costs up to 90 days before EPA officially awards the grant or cooperative agreement. If an applicant incurs costs more than 90 days before the award, the EPA Project Officer must alert the Grants Management Office and prepare a written justification to allow those incurred costs.

Date Posted: 5/23/2023

14.f: *Can you tell me if my planned costs are eligible and reasonable?*

Answer: We cannot guarantee that any budget line would be reasonable and necessary before reviewing the application in full, which we cannot do in advance because it would give an unfair advantage to that applicant.

Date Posted: 5/23/2023

14.g: *How do applicants justify their budget request?*

Answer: Refer to Appendix D in the RFAs for budget guidance and a budget table example. The information in Appendix D includes detailed guidance regarding your proposed budget, specifically that the cost should be adequate, reasonable, and cost-effective to implement this project.

Date Posted: 5/23/2023

14.h: What are participant support costs?

Answer: As defined at 2 CFR 200.1, participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects. As noted in the EPA guidance on participant support costs, EPA regulations expand the definition of participant support costs to include rebates, subsidies and payments to program participants provided by recipients to encourage environmental stewardship. PSC are allowable with prior EPA approval as provided at 2 CFR 200.456.

Participant support costs should be included as direct costs and each line item should be included in sufficient detail under the 'Other' direct cost category for EPA to determine the reasonableness and allowability of its cost. Please see Appendix D of the RFA and RAIN-2018-G05, "EPA Guidance on Participant Support Costs" for further information.

<https://www.epa.gov/grants/rain-2018-g05-r1>.

Date Posted: 5/23/2023

14.i: What participant support costs can applicants include in their applications? Is providing equipment replacement and efficiency upgrades for businesses an eligible P2 activity or participant support cost?

Answer: Applicants may include costs in their budget plan that use federal P2 grant dollars to fund P2 implementation as a way to incentivize business clients and/or beneficiaries to implement P2 without having them absorb the costs for taking this action, including equipment and efficiency upgrades.

Reasonable and necessary participant support costs for P2 implementation, may be considered to the extent that the proposal can demonstrate that approach will provide widespread benefit to disadvantaged communities (beyond the business receiving the support cost) and provided those costs are reasonable and integral to implementing the P2 activity. This approach can best be justified in cases where the support costs will help a business adopt a new or innovative P2 approach that would not otherwise be adopted because of the implementation costs and the P2 approach can serve as a demonstration for other businesses to replicate. However, EPA would not rate grant proposals highly under Merit Evaluation Criteria 1.c., "Effectiveness and Efficiency of the P2 Technical Assistance Approach," if the participant support costs are for P2 actions that are already widely known and adopted, without the potential for replicability.

Date Posted: 5/23/2023

AWARD REQUIREMENTS

15. Reporting and Case Studies

15.a: Do applicants need to submit a reporting plan for their proposed project? What are the reporting expectations for grantees?

Answer: Applicants must provide an estimate of expected outputs and outcomes, as well as a plan for reporting outputs and outcomes during the grant period. Once grants are awarded, grantees will be required to submit:

1. Midyear updates at the 6-month and 18-month mark should be emailed to the grantees' Project Officer providing an update on the number of businesses provided technical assistance. This is a brief email update.
2. Annual reports detailing the outputs and outcomes described in Section VI.C.3, should be submitted annually (e.g., at the one- and two-year mark of the grant).
3. In addition to the annual reports, a final report should be submitted at the conclusion of the grant period detailing outputs and outcomes as described in Section VI.C.3, and including at least one case study.

More details on these reporting requirements can be found in Section VI.C.3 for outputs and outcomes details and VI.C.4 for guidance on submission and content expectations for each report.

Date Posted: 3/8/2023

15.b: *The grant announcements note grantees are required to develop case studies. Can EPA further explain what is needed?*

Answer: EPA expects that each grantee will develop at least one case study during the grant period, which should be submitted along with the final report at grant completion (see reporting expectations above).

Case studies (2-5 pages) will provide technical information on 1 or 2 specific P2 practices, so that other P2 technical assistance providers or interested businesses can learn from and replicate those practices. Guidance on the elements of a P2 case study may be found in Appendix B of the grant announcements.

Case studies are encouraged to highlight P2 practices that are new, not widely known or adopted, or where the grantee believes detailed information on the P2 practices could benefit other business facilities or P2 technical assistance providers. Case studies submitted by grantees will be used to build and share a body of knowledge about P2 practices that could be implemented at other similar business facilities.

Date Posted: 3/8/2023

15.c: *Who owns any information, tools or training developed under this grant? (For example, if a grantee uses EPA funds to help develop a toolkit or training course for an industry sector, who owns the toolkit or training course once it is complete?)*

Answer: In this example, the grantee will own the information, tools or training. However, as discussed in 2 CFR § 200.315, EPA reserves a right to obtain, reproduce, publish, or otherwise use the applicable product(s). By accepting the grant funds subject to this regulation, the grant recipient has agreed to EPA having a license to use the applicable product(s) and data generated with grant funds and authorizing others to freely access and use the material as discussed in the regulation.

Date Posted: 3/8/2023

15.d: *What is the grant reporting database and when/how are grantees required to use it?*

Answer: EPA is developing an online grant reporting database that grantees will be required to use once it becomes available for the annual progress report and the final report. Earlier grant reports should be shared with the grant recipient's Project Officer through email. The grants reporting database link and instructions will be shared with grantees when they become available.

Date Posted: 3/8/2023

15.e: *Are grantees required to use the Excel reporting spreadsheets?*

Answer: Use of these Excel spreadsheets is strongly encouraged, but currently not required. Applicants should consider referring to these templates in their Reporting Plans as their planned method to collect, document and submit the required reporting to EPA. EPA will use this required reported information to determine if workplan requirements are being met and to build a repository of P2 practices that can be widely shared and replicated. Use of the optional Excel spreadsheets will help EPA make the most effective use of the reporting provided. EPA is developing an online grant reporting database that will be required for reporting once the database is completed and posted.

Date Posted: 3/8/2023

RESOURCES

16. Additional Resources

16.a: *Are there any additional P2 project resources (e.g., case studies, guidance, videos or tools) that EPA can share that may help me develop a project?*

Answer:

- P2 grant summaries from 2010 – 2021 are available on [EPA's P2 Grant Award Summary](#) page and describe the types of grant projects previously funded.
- EPA's P2 Program has developed a [resource tool](#) page that allows the public to search through a collection of case studies, webinars, tools, and articles about P2 solutions, practices, and technologies.
- Note: Some of the resources listed are grantee work products and may not have been formally reviewed by EPA and may not reflect the views and policies of EPA. The EPA does not endorse trade names or recommend the use of commercial products mentioned in these documents.
- The [P2 grant program webpages](#) contain applicant resources and more information on the grant programs.

Date Posted: 3/8/2023

16.b: *Are there resources that can help me submit a complete application?*

Answer: Yes. The P2 Program has developed two separate Project Narrative Examples (optional) for each corresponding grant announcement. The documents are provided to help applicants address and organize their project narratives – see Section IV and Appendix C of the corresponding announcement for more information. See the P2 [Communities](#) and [P2 Products](#) Grant Programs pages for more information.

Also, the program has developed an [application checklist](#) to help determine whether your application is ready to submit.

You may find both resources on EPA's Grant Programs for P2 page here:

<https://www.epa.gov/p2/grant-programs-pollution-prevention>.

For general information on submitting a federal grant application please refer to the following sites:

- EPA's Office of Grant and Debarment's website for How to Apply for Grant funding: <https://www.epa.gov/grants/how-apply-grants>.
- EPA's Grant Recipient Training Opportunities page was put together for prospective grant applicants and grantees, see here: <https://www.epa.gov/grants/recipient-training->

[opportunities](#). The page provides a wealth of useful information, e.g., how to develop a budget, understanding the grant process from application to closeout, understanding the different uses of subawards and contracts in a grant, and so much more.

Date Posted: 3/8/2023

16.c: *Who may I contact if I have additional questions on the grant announcements? And what types of questions can EPA answer?*

Answer: P2 program staff may respond to general questions regarding threshold eligibility criteria, administrative issues related to the submission of the application, and requests for clarification about the announcement.

However, in accordance with [EPA's Assistance Agreement Competition Policy – EPA Order 5700.5A1](#), program staff may not meet with individual applicants to discuss draft proposals/applications, provide informal comments on draft proposals/applications, or provide advice to applicants on how to respond to ranking criteria. Program staff also cannot perform cursory reviews of applications. Applicants are responsible for the contents of their applications. To reach P2 program staff, see Agency Contacts – Section VII of the grant announcements.

Date Posted: 3/8/2023

16.d: *Are the pollution prevention webinars for these opportunities recorded and are the slides available?*

Answer: The recordings and downloadable slides from the FY 23-24 pollution prevention webinars can be found [here](#).

Date Posted: 5/23/2023

16.e: *Can I meet with EPA to discuss my plans for an application?*

Answer: EPA cannot meet with applicants, review project proposals, review applications for submission or otherwise show preferential treatment toward an applicant. If you have questions specific to the RFA, you may email p2hub@epa.gov.

Date Posted: 5/23/2023

16.f: *I am not eligible for these grants, where can I find other EPA grant programs?*

Answer: [EPA's grants home page](#) provides additional resources on how to find grant opportunities, including a list of [Specific EPA Grant Programs](#).

Date Posted: 5/23/2023

16.g: *What is the partner connections list? Where can I access it?*

Answer: The partner connection list is a platform EPA has provided for eligible applicants and potential partners to have an opportunity to connect with each other. Early in the application period, we publicized the opportunity to sign up for the partner connection list. Signing up for the partner connection list involved providing your name, organization name, contact information, and areas of expertise in relation to proposed grant work. The sign-up window ended in late April 2023, and the list was distributed to all who signed up. The partner connection list is not publicly available; it is only available to those who provided their information to EPA upon signing up. Participants are responsible for contacting potential partners. EPA will not actively connect eligible applicants and potential partners.

Date Posted: 5/23/2023

16.h: *Who should letters of support be addressed to?*

Answer: Applicants can address letters of support to the grant program contacts listed in Section VII of the applicable RFAs since the contact information has been provided. There is no requirement for who to address these letters to, and applicants will not be penalized for using a different contact.

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