FEDERAL AGENCY: U.S. Environmental Protection Agency (EPA), Office of Chemical Safety and Pollution Prevention, Office of Pollution Prevention and Toxics

FUNDING OPPORTUNITY TITLE: FY 2024 – FY 2025 Pollution Prevention Grant Program Funded by the Bipartisan Infrastructure Law

ANNOUNCEMENT TYPE: Notice of Funding Opportunity (NOFO). This is the initial announcement for this funding opportunity.

FUNDING OPPORTUNITY NUMBER: EPA-I-HQ-OCSPP-OPPT-FY2024-002

ASSISTANCE LISTING NUMBER: 66.708

KEY DATES:

March 18, 2024 NOFO OPENS

March 26/April 11, 2024 GENERAL INFORMATION SESSIONS March 27, 2024 INFORMATION SESSION FOR TRIBES

May 17, 2024 NOFO CLOSES – APPLICATIONS DUE BY 11:59 PM (ET)
August 30, 2024 ANTICIPATED NOTIFICATION OF FUNDING SELECTION
ANTICIPATED AWARD APPLICATION SUBMISSION

DEADLINE: Application packages must be submitted electronically to EPA through <u>Grants.gov</u>, no later than May 17, 2024, to be considered for funding.

Note: Prior to naming a contractor (including consultants) or subrecipient(s) in your application as a "partner" or in any other capacity, please carefully review Section IV.D. of EPA's Solicitation Clauses that are incorporated by reference in this announcement and discussed in relevant part here. Applicants are not required to identify subrecipients and/or contractors (including consultants) in their grant¹ application. However, if they do, the fact that an applicant selected for award has named a specific subrecipient, contractor, or consultant in the application EPA selects for funding does not relieve the applicant of its obligations to comply with subaward and/or competitive procurement requirements as described in Section IV.D. of EPA's Solicitation Clauses. Applicants must compete contracts for services and products, including consultant contracts, and conduct cost and price analyses, to the extent required by the procurement provisions of the regulations at 2 CFR Part 200. Please note that applicants may not award sole source contracts to consulting, engineering, or other firms assisting applicants with the application solely based on the firm's role in preparing the application or based on an assertion that the individual or firm has "unique qualifications."

EPA will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractors during the application evaluation process under criteria #3 for *Partnerships* and criteria #6.c. for *Description of Organizational and Staff Experience*,

¹ For the purposes of this funding opportunity, the term "grant" refers to the grant or cooperative agreement that EPA will award to a successful applicant.

worth 10 points total, unless the applicant provides documentation that it has complied with these requirements. Failure to provide this information may adversely impact the scoring of the application.

For additional guidance, applicants should review EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements, EPA's Subaward Policy, and EPA's Subaward Policy Frequent Questions. EPA expects recipients of funding to comply with competitive procurement contracting requirements in 2 CFR Parts 200 and 1500 as well as EPA's rule on Participation by Disadvantaged Business Enterprises in EPA Programs in 40 CFR Part 33.

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SECTION I. FUNDING OPPORTUNITY DESCRIPTION

A. Background

Applicants are strongly encouraged to read this funding announcement in its entirety. It provides important information on the goals and priorities of the program, explains statutory program requirements, explains criteria used to evaluate and score grant applications, and explains agency grant policies and procedures.

In addition to this Notice of Funding Opportunity (NOFO), EPA is publishing a second Pollution Prevention (P2) NOFO using ongoing appropriated P2 State and Tribal Grant (STAG) funds. The NOFOs are similar. The ongoing STAG-funded NOFO grants have a fifty (50) percent cost share/match requirement as required by section 6605(c) of the Pollution Prevention Act (PPA) of 1990, a larger award funding ceiling, are eligible for inclusion in performance partnership grant agreements and will be incrementally funded over a two-year funding period.

Applicants are welcome to apply to one or both NOFOs. However, applicants should clearly indicate that the work described in each application and workplan is either **separate from or in addition to** the work described in the application and workplan submitted under the other P2 grant announcement. If applicants apply to both NOFOs, 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. For more information on this second P2 grant announcement, see <u>EPA's P2 Grant Program page</u>.

This grant opportunity is announced under the authority of the PPA and is funded by IIJA. EPA is announcing a two-year competitive funding opportunity for awards to eligible entities to provide technical assistance (TA) (e.g., information, training, tools, expert advice) to businesses² to encourage the development and implementation of source reduction practices (also known as "pollution prevention" or "P2"). The priorities for P2 TA, or National Emphasis Areas (NEAs), are described in Section I.F. below. Across all the industrial sector NEAs, where feasible and appropriate, EPA strongly encourages applicants to emphasize TA that addresses environmental justice for disadvantaged communities (see Section I.E.) and/or reduction in the use of hazardous, harmful or toxic materials or substances (toxics).³ Entities that are eligible to apply for this funding opportunity include the fifty states, the District of Columbia, the U.S. Virgin Islands, the Commonwealth of Puerto Rico, any territory or possession of the United States, federally recognized tribes and intertribal consortia, and any agency or instrumentality of a state

² 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.

³ Toxic chemicals can be identified through different EPA toxic or hazardous chemical lists, such as the Toxic Substances Control Act inventory, Toxics Release Inventory (TRI), Resource Conservation and Recovery Act (RCRA), and EPA's List of Lists. Applicants may use other approaches to defining toxics that may be appropriate for their state and project(s) but must specify those approaches in their grant applications.

or federally recognized tribe, including colleges and universities.⁴ Applicants are encouraged, but not required, to develop partnerships where they can strengthen their ability to provide P2 TA to businesses. The goal of this grant opportunity is to provide P2 TA to businesses that will allow those businesses to reduce the use of toxic chemicals and reduce pollution from air, water and land that can adversely impact human health and the environment. This will also help businesses save money by reducing their resource use, expenditures, waste, and liability costs.

To allow a greater number of businesses and communities to benefit from the results and lessons learned from projects funded by these grants, EPA is requiring recipients to develop at least one P2 case study and one P2 success story during the grant period. A P2 case study should provide detailed technical information on one or two specific source reduction/P2 practices implemented by a business, and the benefits achieved, so that other P2 TA providers or interested businesses have enough technical information that they can learn from and replicate those P2 practices. A P2 case study should focus on P2 approaches that are new and not widely known or adopted and/or where the recipient believes detailed information on the project could support more widespread project replication. Case studies submitted by recipients will be used to build and share a body of knowledge about P2 approaches. See Appendix C for guidance on developing case studies. In contrast, a P2 success story is targeted for a very broad audience and succinctly describes how a P2 grantee helped specific businesses adopt P2 approaches, and the environmental and economic benefits achieved from the P2 implementation. Success stories are meant to communicate the value of specific source reduction/P2 actions and the success of the TA provider, with only general information about the technologies and P2 practices. See Appendix D for more guidance on the elements and purpose of a P2 success story. EPA also encourages other means to document, amplify, and widely share projects and lessons learned through the TA provided through these grants. This could include development of videos, training, webinars, or other outreach materials.

B. Pollution Prevention Definition

Section 6603(5)(A) of the PPA 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,

⁴ Colleges or universities that are agencies or instrumentalities of a state government and/or federally recognized tribe are eligible. Colleges and universities must be chartered, commissioned, and/or publicly-owned/operated by the state or tribe in order to be deemed eligible.

minimizing packaging and products, 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 inventory control to reduce the likelihood of the release of pollutants. See <u>Appendix E</u> for examples of P2 approaches and TA projects.

C. Practices that are not P2

As described in Section 6603(5)(B) of the PPA and 40 CFR 35.343(b) and 35.662(b), P2 does not involve practices which alter the physical, chemical, or biological characteristics or the volume of a pollutant, hazardous substance or contaminant through a process or activity which itself is not integral to and necessary for the production of a product or in providing a service. Providing TA on practices that are not considered P2 cannot serve as the basis for P2 grant funding. These non-P2 practices include: recycling of discarded materials, waste clean-up, disposal activities, managing or processing of non-hazardous solid waste (e.g., paper, cardboard, glass, plastics), and the implementation of Lean manufacturing activities that do not involve reductions in the use/release of hazardous substances, pollutants, contaminants, greenhouse gas releases or water use. If any of these activities represent more than a small and ancillary part of the proposed project, EPA will not consider the application for an award. For assistance with recycling of discarded materials, waste clean-up or disposal, and/or management or processing of non-hazardous solid waste activities, please refer to EPA's Reduce, Reuse, Recycle website.

D. Statutory/Regulatory Authority Criteria

Pursuant to Section 6605(b) of the PPA which authorizes these grants and EPA's P2 regulations at 40 CFR 35.342 and 35.661, a P2 grant application must address at least one of the following:

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

E. Environmental Justice (EJ)

This grant program is responsive to the Administration's call for agencies to advance environmental justice in Executive Order 14096: Revitalizing Our Nation's Commitment to Environmental Justice for All. <u>Environmental justice</u>, which is defined by the EPA as the *just treatment* and *meaningful involvement* of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment.

Where appropriate and feasible, EPA encourages applicants to design their projects to incorporate opportunities for meaningful community engagement to consider and address community concerns.

Executive Order 14008, "Tackling the Climate Crisis at Home and Abroad," issued on January 27, 2021, also affirms the Administration's commitment to advancing environmental justice by creating the Justice40 Initiative. The Justice40 Initiative establishes a goal that 40 percent of the overall benefits of certain federal investments—including those in climate change; clean energy and energy efficiency; clean transit; affordable and sustainable housing; training and workforce development; the remediation and reduction of legacy pollution; and the development of critical clean water infrastructure—flow to disadvantaged communities. In addition, Section 219 of the Executive Order stresses that environmental and economic justice are key considerations to factor into governmental decision-making and that transforming disadvantaged communities—historically marginalized, underserved, and overburdened—into healthy, thriving communities, and undertaking robust actions to mitigate climate change while preparing for the impacts of climate change across rural, urban, and Tribal areas are governmental priorities. The Executive Order also calls for making environmental justice part of Agency missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related and other cumulative impacts on disadvantaged communities, as well as the accompanying economic challenges of such impacts.

To address EJ and meet the goals of the Justice40 Initiative, EPA is issuing this grant solicitation requesting applications for P2 projects that emphasize environmental or public health concerns in disadvantaged communities. For the purposes of this grant, a disadvantaged community can be characterized by a particular geographic area identified through the geospatial mapping tools described below, 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. These projects will help transform these disadvantaged communities into healthy, thriving communities capable of addressing the environmental and public health challenges they have historically faced, as well as current and future challenges.

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 Environmental Justice Web-based Screening Tool - Applicants are encouraged, as appropriate, to include data from EPA's EJScreen Supplemental Indexes tool (or other EJfocused geospatial mapping tools) as **part** of their application to help characterize and describe the affected communities/populations and area(s). Data from other sources (e.g., studies, census, and third-party reports) may also be included to give a more complete picture of the impacted communities and populations. Instructions, resources, and tutorials on how to use the EJScreen Supplemental Indexes are included at the hyperlink above; and,

The P2 EJ Facility Mapping Tool, which allows users to identify industrial businesses located in or adjacent to US Census tracts. Applicants should choose the "Supplemental Demographic Index" feature in the tool to identify and characterize the affected communities/populations and area.

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. 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.

F. P2 National Emphasis Areas and Program Priorities

EPA's P2 Program has adopted **six** (6) program priorities referred to as P2 National Emphasis Areas (NEAs), which are described below. Focusing technical assistance (e.g., information, training, tools, expert advice) on these NEAs provides the opportunity for synergies among P2 grantees, businesses and other partners/stakeholders affiliated with similar sectors or communities. By encouraging this collaborative engagement, information, expertise, lessons learned, training, and tools can be more easily shared among grantees working in similar NEAs.

Under this grant competition, five of the P2 Program NEAs address industrial sectors and the sixth is available to federally recognized tribes and intertribal consortia working in Indian country. EPA has posted <u>fact sheets</u> on each of the five industrial sector NEAs which help characterize some P2 opportunities which may exist within that sector.

Across all five industrial sector NEAs, where feasible and appropriate, EPA strongly encourages applicants to emphasize P2 TA that can reduce the use of toxic chemicals and address EJ concerns in disadvantaged communities. Applicants should describe in their project narrative how they will do this.

Applicants may refer to <u>Appendix H</u> for North American Industry Classification System (NAICS) codes covered by the industrial sector NEAs, and to <u>Appendix E</u> for examples of possible P2 grant projects that can support all NEAs.⁵ The project examples in <u>Appendix E</u> are provided for illustrative purposes only.

Applications must address at least <u>one</u> of the NEAs to be eligible for award. Addressing more than one NEA or all NEAs will not give an applicant ranking preference in EPA's selection process. Grants must prioritize and emphasize P2 technical assistance within the NEAs. P2 applications and grants may also address some P2 technical assistance outside of the industry sectors represented by the NEAs:

NEA #1: Food and Beverage Manufacturing and Processing: Carry out P2 technical assistance and projects with food and beverage manufacturing and processing businesses normally associated with NAICS codes <u>311</u> and <u>3121</u> for the purpose of reducing toxic air emissions or water discharges, water or energy usage, hazardous materials generation and use. TA projects or activities associated with entities that are not included under NAICS codes 311 or 3121, such as restaurants, grocery stores and other retail establishments, do not qualify for this NEA.

⁵ North American Industry Classification System, or "NAICS" is the "standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy." Refer to https://www.census.gov/naics.

NEA #2: Chemical Manufacturing, Processing and Formulation: Carry out P2 TA and projects with businesses normally associated with NAICS code 325 and associated subsectors (4-6 digit NAICS codes under 325). Projects under this NEA should facilitate and encourage businesses within this NAICS code to identify, develop, and adopt P2 practices in the production of chemical products and formulations. Projects can also include working with businesses within this NAICS code to promote research, development, and marketing of green chemistry products and processes that reduce or eliminate the generation of hazardous substances.

NEA #3: Automotive Manufacturing and Maintenance: Carry out P2 TA and projects with businesses in the automotive industry, normally associated with NAICS codes 3361, 3362, 3363, and 8111 and associated subsectors. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop and adopt P2 practices in manufacturing and maintenance of automobiles and automotive products.

NEA #4: Aerospace Product and Parts Manufacturing and Maintenance: Carry out P2 TA and projects with businesses in the aerospace industry, normally associated with NAICS codes <u>3364</u> and subsectors for manufacture and <u>488190</u> for maintenance. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop and adopt P2 practices in any aspect of aerospace product and parts manufacturing and maintenance.

NEA #5: Metal Manufacturing and Fabrication: Carry out P2 TA and projects with businesses normally associated with NAICS codes 331 and 332, (primary metal manufacturing and/or fabricated metal manufacturing and subsectors). Primary metal manufacturing is associated with smelting and/or refining ferrous and nonferrous metals from ore, pig or scrap, using electrometallurgical and other process metallurgical techniques. Fabricated metal product manufacturing includes transforming metal into intermediate or end products, such as forging, stamping, bending, forming, and machining, used to shape individual pieces of metal; and other processes, such as electroplating, polishing, coating, welding and assembling. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop and adopt P2 practices in any aspect of primary metal manufacturing and/or fabricated metal. manufacturing and subsectors.

NEA #6: Supporting Pollution Prevention in Indian Country and Alaska Native Villages: *This NEA is only available to federally recognized tribes and intertribal consortia.* Carry out P2 TA and projects with businesses in Indian country and Alaska Native Villages. Projects under this NEA should facilitate and encourage businesses and their facilities in Indian country or in Alaska Native Villages to identify, develop and adopt P2 practices and do not need to support the previous five NEAs or any other specific industrial sector. *Note: TA may also be provided to businesses operated by the federally recognized tribe or intertribal consortium and/or to businesses located in Indian country or in Alaska Native Villages.*

Note that EPA is considering whether to phase out and replace some or all of the NEAs in future P2 Grant solicitation cycles. EPA will seek stakeholder engagement on future NEAs.

G. Technical Assistance (TA) Approaches

All applications must describe how the P2 technical assistance will be provided to businesses (Section I.A, Section I.B). The following approaches may include but are not limited to those listed below, and should, where feasible, prioritize P2 TA where the approaches are new, not widely known or adopted, or where the recipient believes detailed information on the project could support more widespread project replication. Additional examples can be found in Appendix E.

- 1. On-site TA: Conducting TA on pollution prevention practices at businesses.
- 2. Off-site TA: Providing information on P2 practices to businesses remotely, such as by phone, video conferencing, e-mail or through on-demand video instruction.
- 3. Safer Chemical Substitution: Helping businesses assess and redesign their operations, processes and supply-chain practices to replace harmful toxic chemicals with safer chemical alternatives.
- **4. Training:** Developing and conducting training for businesses on use of P2 tools, adopting P2 practices on preventing and/or reducing the release of hazardous materials, reducing the use of toxic chemicals in business operations, or adopting environmental management system protocols.

H. Engaging Partners in Technical Assistance

Applicants are strongly encouraged to develop partnerships that strengthen their ability to provide P2 TA to businesses and facilitate the development, adoption, and dissemination of P2 solutions. Applications will be evaluated on the extent they leverage expertise through partnerships or describe why partnerships are not needed for the proposed work (see Section V.A.3.). EPA's P2 Technical Assistance Resources may be useful for identifying potential partners. Partnerships may include, but are not limited to, university-based TA and cooperative extension programs, environmental assistance programs offered within a State, Tribe or community, local governments, nonprofit or for-profit organizations, businesses, organizations representing disadvantaged communities to ensure equity in participation and others. Partnerships may also include but are not limited to trade organizations, federal programs, EPA's Small Business Environmental Assistance Programs (SBEAPs), the Department of Commerce's National Institute of Standards and Technology (NIST) Manufacturing Extension Partnership Program, and the Department of Energy's (DOE) Industrial Assessment Centers.

NOTE: If you intend to fund a partner's participation in the project, your application must describe how the proposed financial transaction complies with the applicable requirements in 2 CFR Parts 200 and 1500, 40 CFR Part 33 (EPA's Disadvantaged Business Participation Rule), EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Financial Assistance Agreements, EPA's Subaward Policy, and/or EPA's Guidance on Participant Support Costs. EPA will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractors during the application evaluation process under

criteria #3 for *Partnerships* and criteria #6.c. for *Description of Organizational and Staff Experience*, worth 10 points total, unless the applicant provides documentation that it has complied with these requirements. Failure to provide this information may adversely impact the scoring of the application.

Naming a contractor (including a consultant) as a "partner" does not relieve the applicant from complying with competitive procurement requirements in 2 CFR Parts 200 and 1500 as well as 40 CFR Part 33. EPA will not accept sole source contract justifications for professional services (including environmental consulting services and consulting services on preparing grant applications) that are available in the commercial marketplace. (Appendix I)

I. Linkage to EPA Strategic Plan and Goals

EPA must review the linkage of proposed applications to the Agency's Strategic Plan. The grants and cooperative agreements funded under this announcement will need to support EPA's FY
2022-2026 Strategic Plan, under Goal 7: Ensure Safety of Chemicals for People and the Environment, Objective 7.2: Promote Pollution Prevention. Project narratives must explain how the work proposed will support the EPA Strategic Plan goal and objective identified above.

The program anticipates that assistance agreements (grants and cooperative agreements) awarded under this announcement will achieve the Agency's goals and objectives for P2 by addressing the required output and outcome performance measures described in Appendix B.

J. Additional Provisions for Applicants Incorporated into the Solicitation

Additional provisions that apply to Sections III, IV, V, and VI of this solicitation and/or awards made under this solicitation, can be found at <u>EPA's Solicitation Clauses</u>. These provisions are important for applying to this solicitation and applicants must review them when preparing applications for this solicitation. If you are unable to access these provisions electronically at the website above, please communicate with the EPA contacts listed in <u>Section VII</u> of this solicitation to obtain the provisions.

SECTION II. AWARD INFORMATION

A. Number of Expected Awards and Funding Amounts

The total estimated funding for awards under this competitive opportunity is approximately \$13.9 million, issued in full at the time of award. Individual award ceilings are \$350K. EPA anticipates issuing up to 50 awards.⁶ EPA will release awards in the form of grants or cooperative agreements under the authority of Section 6605 of the PPA and IIJA. As provided in IIJA, recipients will not be expected to provide funds to match the federal award.

The awardee's budget and workplan may set aside funds from the two-year award for an optional third year to obtain and report the required information as described in <u>Appendix B</u> of this NOFO. If funds are set aside for an optional third year, the third year should be included in the proposal's period of performance on the SF-424 and be included in the workplan timeline.

⁶ Recipients may partner with other states and tribes within the EPA Region they are located.

In their application, applicants should identify what region their project will be performed in. For a list of EPA regions and the states within each region refer to <u>Section VII</u>.

The number and dollar amount of P2 grants issued will be dependent on funding availability, Congressional appropriations, the quality of applications received, and other applicable considerations. Funding is not guaranteed. EPA anticipates that final selections will be made 180 days after this announcement is published. EPA reserves the right to reject all applications and issue no awards or issue fewer awards than anticipated under this solicitation. All awards will be consistent with applicable EPA regulations and grant policies. In addition, EPA reserves the right to issue additional awards under this announcement, if additional funding becomes available. Any additional awards will be made no later than six months from the date of the original selections.

B. Partial Funding

In appropriate circumstances, EPA reserves the right to partially fund applications by funding discrete portions or phases of proposed projects. If EPA decides to partially fund an application, it will do so in a manner that does not prejudice any applicant or affect the basis upon which an application or a portion thereof was evaluated or selected for an award, therefore maintaining the integrity of the competition and selection process.

C. Funding Agreement Types

Successful applicant(s) will be issued funds in the form of a grant or cooperative agreement under the authority of PPA Section 6605 to cover a two-year funding period⁷ as appropriate. A cooperative agreement is an assistance agreement that is used when there is substantial federal involvement with the recipient during the performance of an activity or project. EPA awards cooperative agreements for those projects in which it expects to have substantial interaction with the recipient throughout the recipient's performance of the project. EPA will negotiate the precise terms and conditions of "substantial involvement" as part of the award process.

The anticipated substantial federal involvement for cooperative agreements under this NOFO may include: close monitoring of the recipient's performance to verify compliance with the EPA-approved workplan and achievement of environmental results; collaboration during the performance of the scope of work, including participation in project activities, to the extent permissible under EPA policies; reviewing proposed procurements in accordance with 2 CFR 200.317 and 2 CFR 200.318; and/or reviewing and commenting on reports prepared under the financial assistance agreement (the final decision on the content of reports rests with the recipient). For more information see: https://www.epa.gov/grants/epa-funding-instruments-and-authorities.

SECTION III. ELIGIBILITY INFORMATION

Note: Additional provisions that apply to this section can be found at <u>EPA Solicitation Clauses</u>.

⁷ Awardee budgets and workplans may set aside funds from the potential two years of federal funding to allow time for a third year to perform the required follow-up with facilities for reporting and developing case studies.

A. Eligible Applicants

Section 6605 of the PPA and applicable parts of 40 CFR Part 35, Subparts A and B (40 CFR 35.340 et seq. and 35.660 et seq.) authorize EPA to award grants and/or cooperative agreements to the fifty states, the District of Columbia, the U.S. Virgin Islands, the Commonwealth of Puerto Rico, any territory or possession of the United States. (40 CFR 35.345), federally recognized tribes that meet the requirements as described in 40 CFR 35.663, Intertribal Consortia that meet the requirements in 40 CFR 35.504, and any agency or instrumentality of a state or federally recognized tribe, including colleges and universities. 8 Colleges and universities must be chartered, commissioned or publicly-owned/operated by the state or the federally recognized tribe in order to be eligible. Colleges and universities must include documentation within their applications indicating or confirming that they are an instrumentality of a state or a federally recognized tribe. This documentation may include, but is not limited to, a state constitutional reference, college/university charter or a W-7 tax form. EPA strongly encourages minority serving institutions (MSIs) that meet the eligibility criteria to apply for these grants. *Note: Local* governments, private universities, for-profit organizations, nonprofit organizations (which are not state or tribal entities), private businesses, and individuals are not eligible to apply for funding under this announcement but can partner with eligible applicants.

B. Cost Sharing and Matching Requirements

There is no cost share/match requirement under this program as authorized under IIJA – <u>Pub. L.</u> <u>117-58</u>, <u>135 Stat.</u> <u>1404</u>.

C. Performance Partnership Grant (PPG) Agreements

Because of the budget accounting that is required for IIJA-appropriated funds, assistance agreements issued under this program are not eligible for inclusion in PPGs.

D. Threshold Eligibility Criteria

Each application must meet the Threshold Eligibility Criteria provided below at the time of submission to be considered for funding. If these requirements are not met by the time of submission, the application will not be considered for funding. Only applications from eligible entities (Section III.A) that meet all threshold eligibility criteria will be evaluated against the merit evaluation criteria in Section V.A of this NOFO. If necessary, EPA may contact applicants to clarify threshold eligibility questions prior to making an eligibility determination. If applications are deemed ineligible for funding consideration as a result of the threshold eligibility review, the applicants will be notified within 15 calendar days of the ineligibility determination.

1. **Statutory Criteria**: Applications must adhere to the statutory criteria for P2 grants by addressing one or more of the Statutory/Regulatory Authority Criteria in <u>Section I.D.</u> and the definition of P2 in <u>Section I.B.</u> The focus of work described in

⁸ Under this grant program, federally recognized tribes and intertribal consortia are not required to have "treatment in a manner similar to a state" (TAS) authorization in order to apply or receive grant funding. The requirements as noted in the code of federal regulations (CFR) and in the preamble to 40 CFR Part 35 provide that the grant program shall have the authority and discretion to evaluate based on the merit evaluation criteria the extent to which federally recognized tribes or intertribal consortia have the capacity to successfully execute the proposed grant activities.

applications must provide technical assistance to businesses on source reduction, such as providing information, training, tools, or expert advice. 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. Non-P2 technical assistance to businesses may only represent a small and ancillary part of the proposed work and must be funded from other sources. If applications include ineligible tasks or activities (i.e., those not considered to be pollution prevention/source reduction, or P2 technical assistance to business) then those activities may be found ineligible for funding and may, depending on the extent of the ineligible activities, render the entire application unsuitable for funding.

- 2. Support of NEAs: Applications must support at least one of the P2 National Emphasis Areas (NEAs) described in Section I.F. Note that P2 technical assistance described in the application must prioritize and emphasize work within the NEAs. P2 activities outside the NEAs may be conducted at low levels, but substantial activities outside the P2 NEAs may be found ineligible for funding and may render the application unsuitable for funding.
- 3. Link to EPA Strategic Plan: Applications must specify how the grant activity links to and supports the goal and objective of EPA's FY 2022-2026 Strategic Plan for P2 and must explain how the grant activities will support expected outputs and outcomes Section I.I and Section I.J.
- **4.** Eligibility: Applications must be from eligible applicants <u>Section III.A.</u>
- **5. Submission Instructions**: Application packages must substantially comply with the submission instructions and requirements set forth in <u>Section IV</u> of this announcement. Project Narratives must be 15 pages or less with a minimum font size of 11.5. Any pages submitted in excess of the 15-page limit will not be reviewed.
- 6. Application Submission Information Through Grants.gov: Application information must be submitted electronically through Grants.gov as stated in Section IV.A of this announcement (except in limited circumstances where another mode of submission is specifically allowed for as explained in Section IV and Appendix G) on or before the application submission deadline noted in Section IV.A. of this announcement. Applicants are responsible for following the submission instructions in Section IV of this announcement to ensure that their application is timely and properly submitted. Please note that applicants experiencing technical issues with submitting through Grants.gov should follow the instructions provided in Section IV, which include both the requirement to contact Grants.gov and email a full application to EPA prior to the deadline. Applications submitted outside of Grants.gov will be deemed ineligible without further consideration unless the applicant can clearly demonstrate that it was due to EPA mishandling or because of technical problems associated with Grants.gov or the System for Award Management (SAM.gov). An applicant's failure to timely submit their application through Grants.gov because they did not timely or properly register in SAM.gov or Grants.gov will not be considered

an acceptable reason to consider a late submission. See <u>Section IV</u> and <u>Appendix G</u> of this solicitation for instructions to submit through <u>Grants.gov</u>.

NOTE: DO NOT WAIT! Register in SAM.gov and Grants.gov as soon as possible. Finalizing these registrations could take a month or more. Late registration in <u>SAM.gov</u> can prevent timely application submission to <u>Grants.gov</u>.

If more than one application is submitted for an identical project by the same applicant (either in error or to replace a previously submitted application), EPA will only review the most recently submitted application, unless notification is sent to p2grants@epa.gov specifying which application to review.

SECTION IV. APPLICATION SUBMISSION INFORMATION

Note: Additional provisions that apply to this section can be found at <u>EPA Solicitation Clauses</u>.

A. Application Submission Deadline

The submission deadline is <u>May 17, 2024, 11:59 PM (ET)</u>. To apply, the applicant's Authorized Organizational Representative (AOR) must submit a complete application package electronically to EPA through Grants.gov (https://www.grants.gov).

B. Grants.gov Submission Instructions

Complete application instructions for applying through <u>Grants.gov</u> can be found in <u>Appendix G</u> of this announcement. Applications submitted through <u>Grants.gov</u> will be time and date stamped electronically. If you have not received a confirmation of receipt from EPA (not Grants.gov) within 30 days of the application deadline, please contact the EPA representative listed in <u>Section VII</u>. Failure to do so may result in your application not being reviewed.

Please reserve enough time to successfully submit your application in the event unexpected errors require you to resubmit your application.

C. Prior to Applying through Grants.gov – Applicants must:

- 1. Designate an AOR as the individual who will submit the application through Grants.gov.
- 2. Be registered and have an active **SAM** account to apply for federal assistance.
- 3. Be registered in Grants.gov.

Note: The registration process for SAM.gov and Grants.gov may take a month or more to complete. <u>Please register early</u>.

D. Content and Forms for Application Submission

Submit *all* materials as described below. Please see <u>Appendix G</u> of this announcement for instructions on how to submit your application through <u>Grants.gov</u>.

1. Mandatory Forms and Documentation:

a. SF-424, Application for Federal Assistance: To properly prepare and submit

- this form Existing and new SAM.gov registrants will be assigned a free SAM-issued Unique Entity Identifier (UEI).
- **b. SF-424A**, **Budget Information**, **Non-Construction Programs**: Prepare form as indicated to address the budget categories of grant work. NOTE: The dollar totals on the SF-424, SF-424A, and the detailed budget submitted as part of the narrative proposal **MUST** all be the same.
- c. EPA Form 4700-4, Pre-Award Compliance Review Report for All Applicants Requesting Federal Financial Assistance: Prepare form as indicated. Helpful tips for completing the form can be found at: https://www.epa.gov/grants/tips-completing-epa-form-4700-4.
- **d. Key Contacts Form (5700-54):** Identify key personnel who will file and manage the paperwork, fund activities, and direct funded work.
- e. Eligible Applicant Documentation for Non-State Agencies (e.g., Colleges and Universities): Documentation within the application indicating or confirming that they are an instrumentality of a state or a federally recognized tribe. This documentation may include, but is not limited to, a state constitutional reference, college/university charter or a W-7 tax form.
- **f. Grants.gov Lobbying Form:** To be submitted by applicants requesting more than \$100,000 of EPA grant funding.
- g. Project Narrative: The Project Narrative should contain the following: a cover page sharing contact details; responses to threshold criteria; merit evaluation criteria responses; and a timeline. All items described below must be 15 pages or less with a minimum font size of 11.5. Any pages submitted in excess of the 15-page limit will not be reviewed.
 - Project Narrative Components: The project narrative should include the following components:
 - A cover page, including: grant name and funding opportunity number; applicant type; national emphasis area (NEA) supported by the project, EPA region where the work will be performed; funding requested; SAM registration date; applicant contact information; and a project summary that fully describes the project and will be used in public-facing communications on the EPA website;
 - Demonstration of the following threshold criteria: statutory criteria; eligibility; support of NEA(s); and link to EPA strategic plan for P2 (Section III.D.3);
 - Responses to <u>all</u> merit evaluation criteria, including the budget description (<u>Section V.A</u>)
 - o Applicants must include a detailed budget for their application which itemizes project costs broken out by budget categories. For the convenience of applicants, an example of an itemized budget is provided in Appendix F. Use of this optional budget table example is encouraged but not required and applicants that do not use the optional budget table example will not be penalized. However, using the optional budget table example provided in Appendix F can assure that the proper level of budget detail and itemization is clearly provided. The itemized budget

must account for two years of federal grant funding with an optional third year to perform follow-up to determine P2 implementation for reporting and to develop at least one P2 case study and one P2 success story. Applicants should consider the costs of the entire project implementation including reporting on P2 outcome and output measures, following up on P2 implementation, and developing at least one P2 case study and one P2 success story. Itemized budgets are expected to include expenses to travel to and attend national and regional EPA P2 Grantee meetings. The budget totals provided here MUST match the funds requested on the SF-424 and the SF-424A. Note that applicants may upload the required itemized budget to Grants.gov as a document separate from the Project Narrative, such as by using the optional budget table example. If this is done, the itemized budget will not count toward the 15-page limit for the Project Narrative.

- **Project Narrative Example:** An optional Project Narrative Example is included in Appendix A. Applicants are encouraged, but not required, to use this optional Project Narrative Example to assure that the components of the Project Narrative listed above (cover page, threshold criteria demonstration and merit evaluation criteria responses) are effectively addressed and organized within their project narrative submission. Use of the example may help expedite EPA's review and scoring of your grant application. The optional Project Narrative Example is also available for download on the P2 Grant website as an editable Microsoft Word document, which will allow users to enter their narrative in expandable sections. Applicants are encouraged to convert the final Project Narrative file to pdf prior to submitting their grant applications. While applicants are not required to use the optional Project Narrative Example, including cover page, it is being provided as a tool to assist applicants in preparing their applications. Applicants who do not use the sample format will not be penalized when EPA evaluates their applications.
- Additional Merit Evaluation Criteria Guidance for the Narrative:
 When responding to evaluation criteria, refer to Section V.A. Additional language is provided below for each criteria:
 - Technical Approach: Applicants should provide a technical approach that:
 - provides a clear description of their project and how they will deliver technical assistance to businesses;
 - is feasible and adequately developed;
 - supports the P2 National Emphasis Areas (NEAs);
 - describes the environmental and/or human health concerns the P2 technical assistance is intended to address;
 - emphasizes toxics use reduction through P2 technical assistance; and
 - is likely to result in the recommendation of P2 actions that are new or not widely known.

- Addressing Environmental Justice Concerns in Disadvantaged Communities: The project narrative should describe:
 - o how the P2 technical assistance can address human health and environmental impacts in disadvantaged communities;
 - a plan to identify disadvantaged communities and businesses that are in or adjacent to, or otherwise impacting those communities within each NEA industrial sector; and
 - a plan, as appropriate and feasible, to engage disadvantaged communities in targeting businesses and designing P2 technical assistance projects.
- Partnerships: Applicants should describe a plan to develop partnerships to strengthen the ability to provide P2 technical assistance to businesses or demonstrate how the applicant will be able to be achieve project objectives without partnerships. Note that if specific partners are named (whether identified as contractors, consultants, and/or subrecipients) that will be funded through the grant, the applicant must describe how they comply with subaward and/or competitive procurement requirements as described in Section IV.D. of EPA's Solicitation Clauses and the procurement provisions of the regulations at 2 CFR Part 200. See also Section I.H. and Appendix I.
- Amplification of Best Practices: The project narrative should describe a plan to:
 - o identify audiences to share P2 best practices with; and
 - widely share P2 best practices developed and lessons learned from the grant implementation with identified audiences to encourage project replication.
- Environmental Results, Measurement, and Reporting: Applicants should describe:
 - o A reporting plan that is consistent with the reporting requirements and measures described in Appendix B; and
 - a plan and commitment to develop at least one case study (<u>Appendix</u>
 <u>C</u>) and one success story (<u>Appendix</u> <u>D</u>) and any other materials to document adopted P2 practices.
- Programmatic Capability and Environmental Results Past
 Performance: Applicants should submit a list of federally and/or non-federally funded assistance agreements (assistance agreements include Federal grants and cooperative agreements but not Federal contracts) that your organization performed within the last three years (no more than 5 agreements) and describe:
 - whether, and how, you were able to successfully complete and manage those agreements;

- your history of meeting the reporting requirements under those agreements including whether you adequately and timely reported on your progress towards achieving the expected outputs and outcomes of those agreements (and if not, explain why not) and whether you submitted acceptable final technical reports under the agreements; and
- o your organizational experience and plan for timely and successfully achieving the objectives of the proposed project, your staff expertise/qualifications, staff knowledge, and resources or the ability to obtain them, to successfully achieve the goals of the proposed project. Note that if a partner (whether identified as contractors, consultants, and/or subrecipients) will be funded through the grant and is included as part of an applicant's organizational and staff experience and expertise, EPA will not consider the qualifications, experience, and expertise of the named partners in the evaluation process unless the applicant provides documentation that it has complied with the subaward and/or competitive procurement requirements as described in Section IV.D. of EPA's Solicitation Clauses and the procurement/subaward provisions of the regulations at 2 CFR Part 200. See also Section I.H. and Appendix I.
- Timeline: The timeline must include all project tasks mentioned in the proposed project. Each task should have associated milestones necessary to complete the task and an expected date of completion for each milestone. Project tasks should include, but not be limited to, setting the groundwork for the project, developing and providing necessary training, identifying community and other project partners, identifying businesses to be served, TA to be provided, proposed follow-up with businesses, development of marketing and outreach materials, implementation of a marketing plan, measuring and gathering results, development of case studies, and required reporting.
- **Budget:** The project narrative should include:
 - A budget description of the procedures and controls to ensure grant funds will be expended in a timely and efficient manner and a description of why budget costs are integral and necessary to carry out the proposed project. The budget description counts toward the 15-page limit for the project narrative.
 - An itemized budget that provides estimated costs (by category) that are eligible, adequate, reasonable, and cost-effective to implement the project. The itemized budget must account for two years of federal grant funding with an optional third year to perform follow-up to determine P2 implementation for reporting and to develop at least one P2 case study and one P2 success story. Applicants should consider the costs of the entire project implementation including reporting on P2 outcome

and output measures, following up on P2 implementation, and developing at least one P2 case study and one P2 success story. The itemized budget is expected to include expenses to travel to and attend national and regional EPA P2 Grantee meetings. The budget totals provided here MUST match the funds requested on the SF-424 and the SF-424A. Applicants must itemize costs using the budget categories and may use the optional budget table example provided in Appendix F and outlined in the project narrative (Section IV.D.g).

Applicants should also provide further detail on;

- any contracts and subawards that have been budgeted (including the types of activities that will be supported and procurement plan);
- any program income generated through the work; and
- a brief description of the intended use of any equipment or supplies budgeted. Please see the Budget Guidance in <u>Appendix F</u> for more details on which costs should be explained.

Please note that applicants have the option of submitting the itemized budget as a separate document from the project narrative. If the itemized budget is submitted as a separate document from the project narrative, it will not count toward the 15-page limit of the project narrative.

- **2. Optional Documents:** The following documentation, while not required, is encouraged to be submitted, and will not count toward the 15-page limit for the Project Narrative:
 - **a.** Letters of Support: Describe the community organizations and other partner organizations that will be engaged in the project and the service(s) they will provide to help carry out and enhance the project activity.
 - **b. Staff resumes:** Reflect the knowledge, experience and/or expertise to conduct proposed work.
 - c. The Climate and Economic Justice Screening Tool (CEJST) Data: Include data, analyses, and results to help characterize and describe the affected communities/populations and area(s) (Section I.E.)
 - **d.** Approval Letter: If applicable to use alternate means to submit initial application.
 - e. Negotiated Indirect Cost Rate Agreement: Applicants may budget for indirect costs pending approval of their Indirect Cost Rate Agreement by the cognizant Federal agency or an exception granted by EPA under section 6.3 or 6.4 of EPA's Indirect Cost Policy for Recipients of EPA Assistance Agreements. However, recipients may not draw down indirect costs until their rate is approved or EPA grants an exception.

Note: Please attach optional documents to the "Other Attachment Form" provided within <u>Grants.gov</u>.

E. Releasing Copies of Applications

In concert with the EPA's commitment to conducting business in an open and transparent manner, copies of applications submitted under this NOFO may be made publicly available on the EPA's Pollution Prevention Grant's website or other public website for a period of time after the selected applications are announced. The EPA recommends that applications not include trade secrets or commercial or financial information that is confidential or privileged, or sensitive information, if disclosed, that would invade another individual's personal privacy (e.g., an individual's salary, personal email addresses, etc.). However, if such information is included, it will be treated in accordance with 40 CFR § 2.203. (Review the EPA Clause IV.a., Confidential Business Information, under the EPA Solicitation Clauses.)

Clearly indicate which portion(s) of the application you are claiming as confidential, privileged, or sensitive information, or state 'n/a' or 'not applicable' if the application does not have confidential, privileged, or sensitive information. As provided at 40 CFR § 2.203(b), if no claim of confidential treatment accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to the submitter.

F. Opportunity for Questions and Answers Regarding this Announcement

EPA's national P2 Program will host informational webinars for potential applicants and interested stakeholders on this announcement. The webinars will be held from 2:00-3:30 PM (ET) on the following dates: March 26 and April 11, 2024, and on March 27, 2024, for tribal entities.

To register, please go to:

March 26, 2-3:30 PM ET:

https://www.zoomgov.com/webinar/register/WN 2sWo5AfvQfCKHU3n Cl9Vw

March 27, 2-3:30 PM ET (for tribal entities):

https://www.zoomgov.com/webinar/register/WN oFbojyaiRXWfTrdN-Kuqqg

April 11, 2-3:30 PM ET:

https://www.zoomgov.com/webinar/register/WN v7lOPt5GTP6eT720RFqVgg

For each webinar, attendees are advised to connect five minutes prior to the scheduled time indicated to ensure proper connection. The webinar link works best when using the Google Chrome browser.

Connection problems may result when using Internet Explorer or Microsoft Edge. For those unable to attend, a recording of the webinar will be posted to <u>EPA's Pollution Prevention Grant Program</u> website. For details on the types of questions EPA can respond to, please refer to the grant solicitation clause on <u>Pre-Proposal/Application Assistance and Communication</u>.

Additionally, interested applicants are strongly encouraged to review <u>EPA Grants Management Training for Applicants and Recipients</u> for general information on EPA grants and the P2 Grant Program's List of Frequent Questions that provides questions and answers on P2 grants. Please

refer to EPA's P2 Grant Program web page for information: https://www.epa.gov/p2/grant-programs-pollution-prevention.

SECTION V. APPLICATION REVIEW INFORMATION

Note: Additional provisions that apply to this section can be found at EPA Solicitation Clauses.

Only eligible entities whose complete applications meet the threshold eligibility criteria in Section III.D of this announcement will be reviewed against the merit evaluation criteria provided below. Each application will be rated using the points-scale system described below. Applications will be evaluated based on a maximum total of 100 points.

EPA will review project narratives for clarity, concise form, logical flow of information and clear responsiveness to all merit evaluation criteria. To assist EPA reviewers, applicants are strongly encouraged to reference the numbers and titles of the merit evaluation criteria in their project narratives to help identify where the criteria are being addressed. To help ensure applicants are addressing all merit evaluation criteria and to assist EPA review of applications, applicants are encouraged, but not required, to use the optional Project Narrative Example found in Appendix A.

A. Merit Evaluation Criteria

Applications will be evaluated based on the following:

Criterion	Description	Points
1. Technical Approach (34 Points)	 a. Description of Proposed Project and Technical Assistance (TA) Approach. The quality and extent to which the project narrative provides: a clear description of the project; how the project is consistent with the definition of P2; and how the TA will be delivered to businesses (e.g., direct on-site TA to businesses, off- site or remote TA to businesses, developing and delivering training courses or webinars, and/or developing or delivering written materials or online content). 	6
	 b. Feasibility of the Approach. The quality and extent to which the project narrative describes a technical approach which: is adequately developed and appropriate to the goals of the project; is feasible to complete project tasks, estimated outputs and outcomes; and addresses whether there are potential problem areas. 	7
	 c. Support of P2 National Emphasis Areas (NEAs): The quality and extent to which the project narrative describes how the P2 TA project will prioritize work within the NEA(s) selected for this grant, including: whether the application clearly explains the approach to identify and target facilities associated with the North American Industry Classification System (NAICS) codes in the NEA(s); and the specific work planned that will support the NEA(s). NOTE: Applications will not be awarded additional points or given added preference for addressing multiple NEAs. Refer to Section I.F and Appendix H. 	6
	d. Environmental and/or Human Health Concern. The quality and extent to which the project narrative describes the environmental and/or human health concerns the P2 TA is intended to address.	9

Criterion	Description	Points
	e. Toxics Use Reduction. The quality and extent to which the project narrative addresses how the grant will emphasize toxics use reduction through the P2 TA (Section I.A).	3
	f. Innovation of the P2 TA Approach. The quality and extent to which the project narrative describes a TA approach that will result in the recommendation of P2 approaches that are new or not widely known or adopted.	3
2. Addressing Environmental Justice Concerns in Disadvantaged Communities (5 Points)	 The quality and extent to which the narrative describes: P2 TA that can address human health and environmental impacts in disadvantaged communities; a plan to identify disadvantaged communities and businesses that are in or adjacent to, or otherwise impacting those communities within each NEA 	
	 industrial sector as described in <u>Section I.E</u>; and a plan, as appropriate and feasible, to engage disadvantaged communities in targeting businesses and designing P2 TA projects that can improve human health and the environment in their communities. NOTE: Applications from federally recognized tribes and 	5
	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.	
3. Partnerships (5 Points)	The quality and extent to which the project narrative describes a plan to develop partnerships to strengthen the ability to provide P2 TA to businesses or demonstrate how the applicant will be able to be achieve project objectives without partnerships (Section I.H). NOTE: If your application describes partnerships that will be funded through the grant to help carry out project tasks, you must describe how you have or will comply with the subaward and/or competitive procurement requirements as described in Section IV.D. of EPA's Solicitation Clauses and the procurement provisions of the regulations at 2 CFR Part 200.	5

Criterion	Description	Points
4. Amplification of P2 Best Practices (7 Points)	 Amplifying P2 Best Practices. The quality and extent to which the project narrative describes a plan and clearly demonstrates a commitment to: identify audiences to share P2 best practices (e.g., other P2 TA providers, interested businesses, environmental professionals); and widely share P2 best practices, including outreach materials developed during the grant (e.g., case studies, success stories, webinars, toolkits, assessment checklists, training modules, videos) and lessons learned from the grant implementation (e.g., insights, challenges, successes, recommendations) with identified audiences to encourage project replication. 	7
5. Environmental Results, Measurement, & Reporting (21 Points)	 a. Reporting Plan. Applications will be evaluated based on the quality and extent the project narrative describes a reporting plan that is consistent with the reporting requirements and measures described in Section I.J. and Appendix B, including: a commitment to report on the output and outcome measures specified in Section I.J. and Appendix B for each facility provided P2 TA under the grant; an estimate of the number of specified outputs and expected outcome measures (Note: this is a requirement to estimate and not an expectation or a commitment to a certain level of outputs and outcomes); and the approach for following up with each business provided P2 TA under the grant to identify and report on P2 actions that have been implemented and what outcomes resulted. 	14
	b. Documenting P2 Best Practices. The quality and extent to which the project narrative describes a plan and commitment to develop at least one case study and one success story and any other materials (e.g., outreach materials, videos, trainings) to document adopted P2 practices, as specified in Section I.A and consistent with the guidance on Case studies and Success Stories found in Appendix C and Appendix D.	7
6. Programmatic Capability & Environmental Results Past Performance	Applicants will be evaluated based on their ability to manage the proposed project. EPA will consider the information provided by the applicant and may also consider relevant information from other sources including agency files and prior/current grantors (e.g., to verify and/or supplement the information supplied by the applicant). If	3

Criterion	Description	Points
(11 Points)	you do not have any relevant or available past performance or past reporting information, please indicate this in the application and you will receive a neutral score for a. and b. of criterion 6 (a neutral score is half of the total points available in a subset of possible points). If you do not provide any response for these items, you may receive a score of 0 for these factors. Applicants will be evaluated considering their: a. Project Completion. Past performance in successfully completing and managing assistance agreements (federal and non-federal grant agreements) identified in response to Section IV.D of the solicitation.	
	b. Reporting History. History of meeting the reporting requirements under prior federal and non-federal assistance agreements identified in response to Section IV.D of the solicitation, including whether the applicant submitted acceptable final technical reports under those agreements and the extent to which the applicant adequately and timely reported on their progress toward achieving the expected outputs and outcomes under those agreements and if such progress was not being made whether the applicant adequately reported, why not.	3
	c. Description of Organizational and Staff Experience. Organizational and staff expertise/qualifications, staff knowledge and resources, and/or the ability to obtain them to successfully achieve the goals of the proposed project. Note that if a partner will be funded through the grant and is included as part of an applicant's organizational and staff experience and expertise, EPA will not consider the qualifications, experience, and expertise of the named partner in the merit evaluation process unless the applicant demonstrates compliance with the regulations and EPA Policies pertaining to procurement/subawards, consistent with the language in criterion #3 for Partnerships.	5

Criterion	Description	Points
7. Timeline (7 Points)	Applications will be evaluated based on the quality and extent to which project narratives set forth a reasonable timeline for executing tasks associated with the project. The timeline must include the following components: • tasks mentioned in the description of proposed project; • anticipated dates (from start to completion of each task); • milestone markers (including the timing and approaches used to follow up with business); • development of case studies, success stories and other outreach materials; and • a brief explanation for achieving project goals and objectives by the end of the project. NOTE: The timeline must account for an expected two-year project period, with an optional third-year available for obtaining and reporting required information as described in Appendix B of this NOFO and developing case studies and success stories.	7
8. Budget (10 Points)	 a. Budget Description. Applicants will be evaluated based on the quality and extent to which their budget description addresses the following components: a description of the procedures and controls to ensure awarded grant funds will be expended in a timely and efficient manner; and a description of why budget costs are integral and necessary to carry out the proposed project(s), where additional information may be needed to determine if they are eligible, adequate, reasonable, and cost-effective to implement the project. For example, applicants should provide further detail on any contracts and subawards that have been budgeted (including the types of activities that will be supported and procurement plan), any program income generated through the work, and a brief description of the intended use of any equipment or supplies budgeted. Please see the Budget Guidance in Appendix F for more details on which costs should be explained. 	5

Criterion	Description	Points
	b. Itemized Budget. Applicants will be evaluated based on the quality and extent to which a detailed budget is presented that itemizes estimated costs (by budget category) that are eligible, adequate, reasonable, and cost-effective to implement the project. Note: The itemized budget must account for two years of federal grant funding with an optional third year to perform follow-up to determine P2 implementation for reporting and to develop at least one P2 case study and one P2 success story. Applicants should consider the costs of the entire project implementation including reporting on P2 outcome and output measures, following up on P2 implementation, and developing at least one P2 case study and one P2 success story. Itemized budgets are expected to include expenses to travel and attend national and regional EPA P2 Grantee meetings. The budget totals provided here MUST match the funds requested on the SF-424 and the SF-424A. Applicants must itemize costs using the budget categories and may use the optional budget table example provided in Appendix F and outlined in the project narrative (Section IV.D). Note that if the itemized budget is submitted to Grants.gov as a separate document, such as the optional Budget Table Example provided in Appendix F, it will not count toward the 15-page limit for the project narrative.	5

B. Review and Selection Process:

- 1. Review: All applications received by Grants.gov by the submission deadline will first be evaluated by EPA staff against the Threshold Eligibility Criteria (Section III.D). Applications that do not meet the Threshold Eligibility Criteria and are deemed ineligible will not be evaluated further or considered for funding. Only applications meeting the Threshold Eligibility Criteria in Section III.D will be evaluated using a national review process where regional review panels in each EPA Region will review applications for projects proposed in their region. Reviewers on each regional review panel will include P2 program staff from that EPA region, P2 program staff from another EPA region and EPA Headquarters. Some EPA regional review panels may also include staff from other agency program offices. Applications will be evaluated and ranked based on the merit evaluation criteria and point allocation scale provided in Section V.A.
- 2. Selection: Each EPA review panel will recommend applications for funding to the applicable Regional Selection Official based on their evaluations and rankings. The Regional Selection Official may also consider geographic diversity and P2 programmatic priorities in making selection decisions. Selection(s) and funding decisions will be sent to the National P2 Program Director in EPA Headquarters for review, concurrence, and to ensure that the project(s) meet the objectives of this NOFO. EPA anticipates final selection decisions will be made by August 30, 2024.

SECTION VI. AWARD ADMINISTRATION INFORMATION

Note: Additional provisions that apply to this section can be found at **EPA Solicitation Clauses**.

A. Award Notification

EPA anticipates award notifications will be made via electronic mail (email) to the successful applicants by August 30, 2024. The notifications will be sent to the original signer of the application or to the project contact listed on the Key Contact form of the application package. This notification will inform the applicant that their application has been selected and is being recommended for an award, but it is not an authorization to begin work. The official notification of an award will be made by the appropriate EPA Award Official. Applicants are cautioned that only an EPA grants officer is authorized to bind the Federal Government to the expenditure of funds. Selection of a P2 grant application does not guarantee an award will be made. For example, statutory authorization questions, funding issues, or other discoveries found during the award process may affect the ability of EPA to make an award to an applicant. The award notice, signed by an EPA grants officer, is the authorizing document and will be provided by email. The successful applicant may need to amend or submit additional documents and forms which must be approved by EPA before the grant can officially be awarded. The time between notification of selection and award of a grant can take up to 90 days or longer.

B. Submission Requirements

All application forms must be filled out in their entirety, prior to being considered for an award (refer to 2 CFR Part 200, as applicable). Successful applicants will be required to certify that they have not been debarred or suspended from participation in federal assistance awards in accordance with 2 CFR Part 180.

C. Administrative Requirements

- 1. Awards Management: Awards will be issued in FY 2024 and FY 2025 and managed by the applicable EPA Regional P2 Program. Awards are anticipated to be issued by November 30, 2024. Awards issued under this announcement are subject to the requirements of the Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards; Title 2 CFR, Parts 200 and 1500. EPA also has programmatic regulations located in 40 CFR Chapter 1 Subchapter B. A listing and description of general EPA regulations applicable to the award of assistance agreements may be viewed at https://www.epa.gov/grants/epa-policies-and-guidance-grants. General Terms and Conditions may be found at https://www.epa.gov/grants/grant-terms-and-conditions.
- **2. Quality Assurance Documentation**: Quality assurance documentation is required for awards that involve Environmental Information Operations (EIO). EPA Project Officers will work with all selected recipients on quality assurance (QA) requirements. Once the award is made that would involve EIO, a Quality Management Plant (QMP) and/or Quality Assurance Project Plan (QAPP) are/is required for the project, the applicant will develop the document and submit for EPA's approval. Selected applicants cannot begin environmental information operations until EPA approves the QMP and / or QAPP. If graded approach is applicable, a QMP may be combined with a QAPP to develop a combined QMP-QAPP.
 - a) Environmental Information Operations: A collective term that encompasses the collection, production, evaluation, or use of environmental information and the design, construction, operation, or application of environmental technology. Environmental information includes data and information that describe environmental processes or conditions. Examples include but are not limited to: direct measurements of environmental parameters or processes, analytical testing results of environmental conditions (e.g., geophysical, or hydrological conditions), information on physical parameters or processes collected using environmental technologies, calculations or analyses of environmental information, information provided by models, information compiled or obtained from databases, software applications, decision support tools, websites, existing literature, and other sources, and development of environmental software, tools, models, methods, and applications.
 - **b) QMP**: The recipient will need to develop a QMP if the project involves EIO. The QMP describes an organization's Quality Program. Requirements for QMPs are found in the most recent version of EPA's <u>Quality Management Plan Standard</u>. A QMP documents the technical activities to be performed and how the program will integrate QA, quality control, QAPPs, training, etc., into all its environmental information operations.

- c) QAPP: The recipient will need to develop a QAPP(s) if the project involves EIO. A QAPP describes how environmental information operations are planned, implemented, documented, and assessed during the life cycle of a project. Requirements for QAPPs are found in the most recent version of EPA's Quality Assurance Project Plan Requirements. Quality assurance is sometimes applicable to assistance projects (see 2 CFR 1500.12). Quality assurance requirements apply to the collection of environmental data. Environmental data are any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology. Environmental data include information collected directly from measurements, produced from models, and compiled from other sources, such as databases or literature. Once the award is made, if a QAPP is required for the project, the applicant will have to draft a QAPP prior to beginning work on the project. You must reserve time and financial resources in the beginning of your project to prepare your QAPP and include the cost for developing your QAPP in your Detailed Budget. Selected applicants cannot begin data collection until EPA approves the QAPP.
- 1. Mark-up showing Guidance on Reporting Requirements: The reporting required for grant recipients is detailed in <u>Appendix B</u> and should help inform the Reporting Plan that applicants must include in their Project Narrative as described in <u>Section I.J.</u>
- 2. **Progress Reports and Final Technical Reports**: Recipients are required to submit annual progress reports and a final technical report using the guidance below. Some regions may also require additional semi-annual progress reports, e.g., sharing information on milestones, and deliverables beyond these required reports. If a grant is extended, applicants may be required to submit additional midyear updates and annual progress report(s), depending on the length of extension.

a. Midyear Update Guidance:

i. **Submission:** Recipients are expected to email the midyear update to the EPA Project Officer six months and 18 months after the grant award date.

ii. Content:

- 1. Recipients should include the grant award number in the email.
- **2.** Outputs: Provide an update on the number of business establishments provided P2 TA in the last six months.

b. Annual Progress Report Guidance:

i. **Submission:** Recipients are expected to submit annual performance reports on outputs and environmental outcomes achieved as described in <u>Appendix B</u>. Reports must be emailed annually to the EPA Project Officer within 60 days after the anniversary of the grant award and should include the grant award number. The Excel spreadsheet reporting templates, which are available from EPA's P2 Program <u>Grant Reporting page</u>, may be used for this reporting.

ii. Content:

- 1. Outputs: Within the annual progress report(s), the recipient should report on all work completed under this grant to date, not just work completed since the prior report. If the outputs achieved during the reporting period differ from the expected outputs communicated to EPA in the assistance agreement, the recipient should provide an explanation for those differences.
- 2. Outcomes: Outcome data should be collected through follow-up with each business before the end of the grant. If follow-up has not been conducted yet for a business, the outcomes do not need to be reported in the annual progress report(s). Note that only outcome measures from P2 actions that were actually implemented by the businesses receiving P2 TA under this grant will be counted for reported P2 outcomes measures.

c. Final Technical Report Guidance:

- i. **Submission:** Recipients are expected to email a final technical report to the EPA Project Officer within 120 days after the grant activities have concluded and should include the grant award number.
- ii. Content: This report should include all output and outcome data from prior reports as well as any new information received from business follow ups conducted since the last progress report was submitted. Recipients are encouraged, but not required, to report outputs and outcomes in table or spreadsheet form. The Excel spreadsheet reporting templates, which are available from EPA's P2 Program Grant Reporting page, may be used for this reporting. If the outputs achieved differ from the expected outputs communicated to EPA in the assistance agreement, the recipient should provide an explanation for those differences. Note that only outcome measures from P2 actions that were implemented by the businesses receiving P2 TA under this grant will be counted for reported P2 outcomes measures.
- iii. Attachments: Recipients are required to submit at least one P2 case study and one P2 success story, which should be submitted no later than, or with, the final technical report. Case studies should follow the Guidance for Developing P2 Case Studies described in Appendix C.
 Success stories should follow the Guidance for Developing P2 Success Stories described in Appendix D. For each training and TA material developed over the course of the grant, recipients should provide a link to the content or include attachments with their final report. This content may include marketing materials, webinars or videos developed, and tools developed.

SECTION VII. AGENCY CONTACTS

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Appendix A: Project Narrative Example

Introduction: The following example is provided to assist applicants in preparing their project narrative submissions. The example provides instructions and guidance in italicized text that should be removed from the final application. While the use of this example narrative format is optional, utilizing it will help applicants ensure that all the required components of the project narrative are addressed, and the project proposal aligns with threshold and merit evaluation criteria. Use of this optional format may also help EPA more expediently review and score grant applications. In addition to this appendix, an <u>editable Word version of this Project Narrative Example</u> is available for download from the P2 grant site.

Eligible applications will be evaluated and scored based on the applicant's project narrative, which consists of three components listed under <u>Section IV.D.1.g.</u>

- 1) **Cover page**: Including grant name and funding opportunity number, applicant type, NEA supported by the project, location the work will be performed, funding requested, SAM registration date, applicant contact information, a project summary, and if there are any named contractors, consultants and/or subrecipients;
- 2) **Demonstration of the following threshold criteria:** Statutory criteria, eligibility, support of NEAs, and link to EPA strategic plan for P2 (Section III.D); and
- 3) Responses to all merit evaluation criteria (Section V.A).

Preparing the Narrative Submission

Text formatting and page limits: The project narrative must not 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. All information requested below will count toward the 15-page limit except the itemized budget if submitted as a separate attachment. The example narrative format provided below is encouraged, but not required, for the project narrative. This format is also available as an editable Microsoft Word document on the EPA P2 Grant website.

File Type: Applicants are strongly encouraged, but not required, to submit their mandatory forms, project narrative, and cover page as .pdf document files.

Narrative Example

Cover Page: Applicant & Proposal Information: To assist in the review of applications, applicants are advised to complete the following chart with proposed grant details, removing the italicized text:

Applicant and Proposal Information	
Applicant Name: New Hampshire Departmen	Prevention Grant Program Funded by the Bipartisan
Eligible Applicant Type:	Example: State, state entity, federally recognized tribe etc. [Note: See Section III.A] for a full list of eligible entities]
State(s) or tribe(s) where the work will be performed	Example: New Hampshire
EPA Funding Requested:	Example: \$300,000
System for Award Management (SAM) registration date:	MM/DD/YYYY
Optional: If a contractor (including consultant) and/or subrecipient is named, state where and when the Request for Proposals/Request for Qualifications were posted and describe how the proposed financial transaction complies with the applicable requirements in Section I.H.	MM/DD/YYYY, posting location, and description of meeting requirements.
Primary Contact	Administrative Contact (if applicable)
Jane Doe Pollution Prevention Program New Hampshire DES 29 Hazen Drive Concord, NH 03302 Tel: 222-222-2222 Email: jane.doe@state.nh.us	John Doe NH DES Grants Office New Hampshire DES 29 Hazen Drive Concord, NH 03302 Tel: 222-222-2222 Email: john.doe@state.nh.us
Explain how your project is linked to the FY 2022-2026 EPA Strategic Plan Goal 7: Ensure Safety of Chemicals for People and the Environment, Objective 7.2: Promote Pollution Prevention	Example of how your project is linked to the EPA Strategic Goal 7 and 7.2.

Project Summary - fewer than 900 characters

This summary should include a brief description of the applicant's proposed approaches for providing P2 technical assistance to businesses, and how the proposed work will improve human health and the environment in disadvantaged communities. Please note that funding request and a project summary that fully describes the project will be used in public-facing communications on the EPA website. For example:

[Applicant's name] proposed project will provide technical assistance to
[name the <u>business sector/facilities</u>] to [name the pollution prevention activity]. Technical
assistance will include [name the technical assistance activities: technical assistance
can include information, training or tools]. The proposed project will improve human health
and the environment in disadvantaged communities by [environmental objective] in [name
identified disadvantaged communities].

Merit Evaluation Criteria

To assist in the review of applications, applicants are encouraged, but not required, to organize their Project Narrative using the example below to help describe how their work will address the merit evaluation criteria. Please see <u>Section V.A</u> of the FY 2024 – FY 2025 Pollution Prevention Grant Program Funded by the Bipartisan Infrastructure Law grant announcement, EPA-HQ-OCSPP-OPPT-FY2024-002, for the merit evaluation criteria descriptions.

Applicants that do not use the sample format provided below will not be penalized when EPA evaluates their applications. Applicants that use a different format are encouraged to include the identical headers in the same sequence, thereby identifying the criteria being addressed (For example, Criteria 1a. Description of Proposed Project and Technical Assistance Approach). Applicants that choose to use the formatting provided below should remove the italicized text prior to submitting their application. Note: Applicants can expand the response areas below where they need to include more content.

Criteria 1: Strategy and Approach

1a. Strategy and Approach: Description of Proposed Project and Technical Assistance Approach (6 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

1b. Strategy and Approach: Feasibility of the Approach (7 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

1c. Strategy and Approach: Support of P2 National Emphasis Areas (NEAs) (6 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

1d. Strategy and Approach: Environmental and/or Human Health Concern (9 Points)

Please describe how the proposed project meets this criterion as described in <u>Section V.A.</u>

1e. Strategy and Approach: Toxics Use Reduction (3 Points)

Please describe how the proposed project meets this criterion as described in <u>Section V.A.</u>

1f. Strategy and Approach: Innovation of the P2 Technical Assistance Approach (3 Points)

Please describe how the proposed project meets this criterion as described in <u>Section V.A.</u>

Criteria 2: Addressing Environmental Justice Concerns in Disadvantaged Communities

2. Addressing Environmental Justice Concerns in Disadvantaged Communities (5 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

Criteria 3: Partnerships

3. Partnerships (5 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

Criteria 4: Amplification of P2 Best Practices

4. Amplification of P2 Best Practices (7 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

Criteria 5: Environmental Results, Measurement, & Reporting

5a. Environmental Results, Measurement, & Reporting: Reporting Plan (14 Points)

Please describe how the proposed project meets this criterion as described in <u>Section V.A.</u>

5b. Environmental Results, Measurement, & Reporting: Documenting P2 Best Practices (7 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

Criteria 6: Programmatic Capability & Environmental Results Past Performance Criteria

6a. Programmatic Capability & Environmental Results Past Performance Criteria: Project Completion (3 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

6b. Programmatic Capability & Environmental Results Past Performance Criteria: Reporting History (3 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

6c. Programmatic Capability & Environmental Results Past Performance Criteria: Description of Organizational and Staff Experience (5 Points)

Please describe how the proposed project meets this criterion as described in Section V.A.

Criteria 7: Timeline

7a. Timeline: Milestone Schedule (7 Points)

Please provide a timeline that meets this criterion as described in Section V.A.

Applicants are encouraged, but not required, to use the timeline example table provided below. If used, please replace the italicized example text with the relevant information for your proposal's activities. Note that the timeline counts toward the narrative page limit.

Task Description	Start-Complete Dates	Milestone Marker
Develop Sustainable Breweries program criteria/guidelines, workbook/list, certificate	10/22-6/23	Materials finalized, program launch event with CT Guild
Recruit applicants for program through assistance, verify P2 actions, continued promotion	6/23 –9/24	5 or more P2 actions implemented, measurable outcomes
Identify facilities for onsite assistance (energy, wastewater), coordinate w utilities, vendors	11/22 -7/24	2 –4 business receiving assistance, 1 or more P2 recommendations implemented, measurable results
Develop criteria, promote to breweries (EJ community target)	12/22 –2/24	1 –3 host brewery sites in EJ area, reaching 1 – 5 breweries, measurable pollutant reductions

Criteria 8: Budget

8a. Budget: Budget Description (5 points)

Please describe how the proposed project meets this criterion as described in Section V.A.

8b. Budget: Itemized Budget (5 points)

The itemized budget should meet this criterion as described in Section V.A.

Note that the itemized budget may be submitted as a separate .pdf document rather than included here. If the itemized budget is submitted as a separate document to Grants.gov, it will <u>not</u> be counted toward the Project Narrative 15-page limit. Whether using the example budget table in <u>Appendix F</u>, or another format, the information provided should be <u>broken out</u> by budget category. Further information on the itemized budget and an example budget table can be found in <u>Appendix F</u>.

Note: The budget table provided as part of the applicant's proposal is separate from and is meant to supplement information provided on SF-424A, Budget Information – Non-Construction Programs. This form is noted in Section IV.C.1.

ADDITIONAL COMMENTS

Use the remaining space to provide any additional comments or information on your application that has not been addressed above.

Appendix B: Measurement and Reporting Requirements

I. Reporting Requirements: The P2 program relies on grantee performance reporting to provide support and oversight, to demonstrate the value of the grant program, and to provide the business community and technical assistance (TA) providers with lessons learned from each grant. The reporting required for grant recipients is laid out below so applicants fully understand the reporting requirements should they be selected as recipients and to help inform the Reporting Plan that applicants must include in their Project Narrative as described in Section I.J.

Grant recipients will be expected to provide reporting on:

- 1. The required grant outputs (activities and products) for each grant, including the number of outreach and educational activities performed;
- 2. Recipients that provide direct P2 TA to individual business establishments must report the P2 recommendations provided to each business establishment (note: this reporting element is not required for training courses, outreach, or certification and leadership programs);
- 3. Based on information obtained by following up with each business establishment provided P2 TA, **all** grant recipients must report all *newly implemented P2 actions* at each business establishment, and the results (outcomes) from that implementation;
- 4. All recipients must submit any educational, outreach, or TA materials if they are developed as part of the grant;
- 5. All recipients should submit required success stories and case studies as they are developed, but must submit these no later than the final technical report (see <u>Appendix D</u> and <u>Appendix C</u>); and
- 6. Recipients may also report additional output and outcome measures if they choose.
- II. Format: Recipients are encouraged, but not required, to report outputs and outcomes in table or spreadsheet format. For the convenience of the recipients, EPA is providing optional business establishment-level Excel spreadsheet reporting templates, which are available from EPA's P2 Program Grant Reporting page and may be used for the required reporting. These optional Excel spreadsheet reporting templates are designed to capture all the data elements described in the sections below at the facility-level throughout the entire grant cycle. EPA will use this information to determine if workplan requirements are being met and to build a repository of P2 practices. EPA is developing an online grant reporting database that will be required for reporting once the database is completed and posted.

Note: Recipients should not work with businesses that are not willing to provide information to support the reporting described below. Recipients may omit reporting the affiliated business name and location if a business has confidentiality concerns with providing the information needed for the required reporting.

III. Annual Progress Report and Final Technical Report Elements: Annual Progress Report

and Final Technical Reports must include the following data elements:

1. Overview:

- **a. Grant information**: Grant recipient name, Recipient state or tribe, Grant project number, Grant award date, Recipient contact name, Recipient contact phone number, Recipient contact e-mail).
- **b.** Partners and Community Involvement (<u>Optional</u>): Community groups and other organizations partnered with during the grant: Name of organization, entity or group, Point of contact name and email, Partnership description.
- **2. TA Activities:** The reporting requirements for grant recipients are specified below according to the type of grant work performed.
 - i. Grant Work Providing Direct P2 TA to Individual Facilities: Report as described below. If you use the optional Excel Reporting Template 1 that will be posted on the EPA Grant Reporting webpage, these data elements are captured automatically.
 - i. **Report on P2 recommendations provided to each facility**: Within the grant year that the grantee provided the P2 recommendations to a facility, the grantee will need to report to EPA:
 - The facility identifier information, including:
 - Business or facility name (Highly recommended, but optional).
 - EPA facility ID number (Highly recommended, but optional).
 - Facility contact (Name, phone, e-mail) (Highly recommended, but optional).
 - Facility location (city, state) (Highly recommended, but optional).
 - Facility NAICS code (Required).
 - Indicate if the facility is located in or adjacent or is otherwise impacting a disadvantaged community to an underserved community (Required).

NOTE: If a facility raises confidentiality concerns or there are confidentiality constraints under state law, report a generic facility name such as Facility A and omit the EPA facility ID, contact, and the city.

- The date the grantee provided P2 recommendations to the facility.
- An informative description of each specific P2 recommendation the grantee provided to the facility (e.g., specific equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of chemicals or raw materials in a named process). **Do not report recommendations not considered P2** (Section I.B and Section I.C).

- ii. **Report on P2 recommendations implemented at each facility**: A year after the P2 recommendations were provided to a business establishment ⁹or by the end of the grant, grant recipients must follow-up with each facility provided TA and report to EPA:
 - The date(s) the grantee followed up with the business establishment to determine the implementation status of the P2 recommendations previously provided (appropriate follow-up includes phone call, visit, letter, and/or email).
 - For each P2 action recommended to a business establishment, indicate if the recommendation was implemented (y/n). Note: Only report <u>newly</u> implemented P2 actions. Only outcome measures from P2 actions that were newly implemented following the P2 TA will be counted for final reported P2 outcomes measures below.
 - If the recommendation was not implemented:
 - Does the business establishment intend to implement the recommendation in the next 5 years (y/n)? If no, what was the barrier to implementation identified by the business establishment?
 - The gross **cost** of implementation for each newly implemented P2 action if this information can be obtained from the facility.
 - The annualized outcomes ¹⁰achieved from implementation of each P2 action at the business establishment ¹¹, expressed in:
 - reductions of pounds of toxics used (input);
 - reduction in lbs. hazardous waste;
 - reduction in lbs. hazardous air emissions;
 - reduction in lbs. hazardous materials released to water;
 - reductions in gallons of water used;
 - reductions in MTCO₂e released; and/or
 - the dollar savings associated with implementing each P2 action.
 NOTE: Do not include savings from lean manufacturing activities not associated with implementing the P2 actions.
- iii. **Report on P2 outputs:** (Note that several of these outputs, including EJ specific measures, will be calculated automatically if using the optional P2 grant reporting Excel spreadsheet Template 1, which will be posted on the <u>EPA P2</u> reporting website by the time of award):
 - Number of business establishments provided P2 TA.
 - EJ: Number of those establishments provided P2 TA that are in or adjacent

⁹ If implementation occurs the same year as recommendations were made, grantees can report it that year.

¹⁰ Annualized calculations are actual annual results, or the conversion of a partial year result to estimate the result for a full year. If variables other than additional time are being used for this calculation (e.g., seasonality or ramping up implementation of the P2 approach), the variables and methodology should be explained.

¹¹ Indicate the methodology used to calculate this measure, such as use of the optional EPA P2 calculators, utility bills, or other identified methodology. If there are no results for these measures, report zero.

- to, or otherwise impacting disadvantaged communities.
- Percentage of business establishments provided P2 TA that the grantee follows-up with (e.g., phone call, visit, letter, or email) to determine which P2 practices were implemented (should be 100% by the end of the grant).
- Percentage of establishments that implement at least one new P2 practice as a result of the technical assistance provided by the grantee.
 - EJ: Percent of establishments that implement at least one new P2 practice to improve human health and the environment in disadvantaged communities as a result of the TA provided by the recipient.
- Number of case studies and other P2 documentation products describing specific P2 best practices identified, developed, or implemented through the grant.
 - EJ: The number of those case studies that document the projects and approaches used to improve human health and the environment in disadvantaged communities.
- Number of success stories developed to communicate the value of P2 and the success of the TA provider.
- Number of other outreach activities and informational materials (i.e., webinars postings, video postings, mass mailings, or other outreach) that widely share P2 approaches implemented through the grant.
- iv. Grant Work Providing P2 TA to Multiple Facilities at a Time (e.g., P2 training, webinars, roundtables, certification or leadership programs, and other outreach). Report as described in sections i and ii below. If you use the optional Excel Reporting Template 2 that will be posted on the EPA Grant Reporting webpage, these data elements are captured automatically.
 - Within one-year after the TA was provided, or by the end of the grant period, the grantee must make a good faith effort to follow-up with businesses that attended training courses, webinars, roundtables, participated in certification or leadership programs, or otherwise received outreach provided under this grant, to determine if there were any P2 actions that were newly implemented as a result of the P2 technical assistance the grantee provided. If there was, the grantee must report to EPA:
 - The facility identifier information described in this Appendix in Section III.2.a.i above;
 - The date of follow-up with the business establishment to determine the P2 actions implemented;
 - An informative description of each specific P2 action implemented by the business establishment (e.g., specific equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of chemicals or raw materials in a named process). Do not report recommendations not considered P2 (Section I.C). Note that only outcome measures from P2 actions that were newly implemented following the P2 TA will be counted for final

reported P2 outcomes measures below; and

- The gross cost of implementation for each newly implemented P2 action if this information can be obtained from the facility. Do not indicate any savings at this stage.
- The annualized outcomes ¹²achieved from each newly implemented P2 action at each business establishment ¹³, expressed in:
 - 1. reductions of pounds of toxics used (input)
 - 2. reduction in lbs. hazardous waste;
 - 3. reduction in lbs. hazardous air emissions;
 - 4. reduction in lbs. hazardous materials released to water;
 - 5. reductions in gallons of water used;
 - 6. reductions in MTCO₂e released; and/or
 - 7. the dollar savings associated with implementing each P2 action.

<u>NOTE</u>: Do not include savings from lean manufacturing activities not associated with implementing the P2 actions.

- **v. Report P2 outputs:** (Note that several of these outputs, including EJ specific measures, will be calculated automatically if using the optional P2 Grant Reporting Excel Template 2, which will be posted on the <u>EPA P2 reporting</u> website by the time of award):
 - Number of case studies and other P2 documentation products describing specific P2 best practices developed or implemented through the grant.
 - EJ: The number of those case studies that document the projects and approaches used to improve human health and the environment in disadvantaged communities.
 - Number of success stories developed to communicate the value of P2 and the success of the TA provider.
 - Number of amplification activities (e.g., training, webinars, roundtables, or other outreach) that widely share P2 practices and documentation.
 - EJ: Number of these amplification activities that widely share P2 practices and documentation in disadvantaged communities.
 - Standard outputs associated with each amplification event:
 - 1. Topic(s) covered.

¹² Annualized calculations are actual annual results, or the conversion of a partial year result to estimate the result for a full year. If variables other than additional time are being used for this calculation (e.g., seasonality or ramping up implementation of the P2 approach), the variables and methodology should be explained.

¹³ Indicate the methodology used to calculate this measure, such as use of the optional EPA P2 calculators, utility bills, or other identified methodology. If there are no results for these measures, report zero.

- 2. Number of businesses attending each event.
- 3. Increased participant understanding of topics and types of skills achieved during these events.

Appendix C: Guidance for Developing P2 Case Studies

<u>Purpose of Pollution Prevention (P2) Case Studies</u>: To provide technical information on one or two specific P2 practices implemented by a business, including the costs and benefits, so that other P2 technical assistance (TA) providers or interested businesses can learn from and replicate those P2 practices. Case studies will be used to build and share a body of knowledge about P2 practices that could be implemented at similar businesses.

Case studies are not the same as success stories, which are communications targeted for a broad audience. Success stories are meant to demonstrate the value of P2 and the success of the TA provider, with only general information about the technologies and practices that may be of interest to other environmental professionals.

Case studies should not describe all P2 practices implemented. They should only describe one or two specific P2 practices that the recipient believes are new or not widely known or adopted, or where the recipient believes other businesses or P2 TA providers would benefit from the additional technical detail that a case study would provide.

P2 case studies should provide information describing the P2 practice with enough detail that others could generally understand what was done, why it was implemented, and the costs and benefits so that others can determine if the practice is relevant to their circumstance and whether they could replicate the practice. Documentation of implemented actions may enable other businesses to amplify successful P2 practices achieved from P2 grantees. If applicable, the case study should also provide information on the financing mechanism, mode, and/or approach used to implement the P2 practices if that information could be useful to others who may want to replicate the P2 practices described in the case study.

<u>Audience</u>: The target audience for these case studies are environmental professionals, such as State and Tribal P2 Technical Assistance Providers (TAPs) and similar businesses seeking to identify, assess and implement P2 best practices.

Elements: Generally, within 2-5 pages.

- Name and location of the business (optional if confidentiality concerns).
- EPA Region.
- NAICS code¹⁴ and type of business.
- General description of the business (e.g., size of business, annual revenues, number of employees).
- Why did the business choose to explore P2? (e.g., company goals or EMS requirement)
- What problem(s) was identified through P2 TA?

¹⁴North American Industry Classification System, or "NAICS" is the "standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy." Refer to https://www.census.gov/naics.

- What were the major or innovative P2 actions implemented at the business (e.g., process change, chemical substitution, green chemistry solution, equipment changes)? Please provide detail.
- If applicable, what was the financing mechanism, model or approach used to implement the P2 practice(s)?

- Results (to the extent that the information below applies to the P2 action implemented):
 - Narrative description of the human health or environmental benefits addressed in disadvantaged communities, cost savings, or regulatory relief achieved by implementing the P2 actions.
 - o Simple payback period.
 - o Numerical results and associated cost savings for each P2 action and outcome:
 - Reduction in hazardous materials used measured in lbs.
 - Reduction in hazardous substances, pollutants and contaminants released to air, water and land measured in lbs.
 - Reduction in metric tons of carbon dioxide equivalent (MTCO2e).
 - Water conserved measured in gallons.
 - Include regulatory relief not covered in the above (e.g., waste hauling costs, reductions in permitting costs).
 - Other numerical outcomes.

Appendix D: Guidance for Developing P2 Success Stories

<u>Purpose of P2 Success Stories</u>: Success stories are meant to demonstrate the value of P2 and the success of the technical assistance (TA) provider, with only general information about the technologies and practices that may be of interest to a broad audience. Success stories are meant to build interest about how the pollution prevention grant program is implemented and how businesses adopted P2 practices through TA from grantees. Similar to case studies (<u>Appendix C</u>), EPA wants to showcase stories about *completed* implementation actions in businesses, not just recommendations. However, these stories can include information about the nature of the technical assistance that led to the change. For example, the success story can include information about how the technical assistance provider gained access to the business and how the business came to make any modifications to its systems or processes.

Technical information on specific P2 practices implemented by a business, including specific costs and benefits, should be covered in case studies. Further guidance for developing P2 case studies is included in <u>Appendix C</u>.

Audience: The general U.S. public.

<u>Timeline and Process</u>: A completed success story is a required project output and grantees should email at least one success story to their Project Officer along with, or prior to, final reporting. Success stories are not required in the application but should be planned for as an output within the application narrative.

<u>Format and Length</u>: A completed success story should contain the elements listed below. One to two pages in length should be sufficient for written content. EPA encourages the use of photos in the success story (see below for informed consent that is needed for EPA to publish the story on its website). EPA also encourages other success story formats, such as videos or blog posts, if the content meets the elements provided below.

Informed Consent: EPA encourages grantees to obtain consent from subjects of case studies and success stories to share their story and image. For the content collected as part of this report, EPA will not share surnames, the first names of individuals under 18 years of age, or first names and community name in the same story or post in accordance with our privacy policies. If you have any questions regarding this reach out to your EPA Project Officer. Any consent forms should be shared with EPA along with the submitted case study and success story. If consent forms were not signed, EPA may reach out to the subjects in submitted photo(s) and ask them to sign EPA consent forms.

Elements: Success stories should include the elements in the optional success story format below.

- 1. Success Story Name
- 2. Grantee Information (please include at least the grantee name in the output)
- 3. Business or Facility that received P2 Technical Assistance:

- Business/ Facility Name
- Describe the type of business
- Location
- Year P2 was implemented

4. P2 Overview:

- Describe the pollution problem as well as any human health or environmental concerns that the TA was intended to address;
- Describe the P2 action taken/implemented to address the human health or environmental issue (Note: pictures and other media are encouraged and welcome, but please refer to the informed consent above to obtain releases of individuals depicted in the stories); and
- If applicable, describe any environmental justice concerns that were addressed through the P2 actions being implemented.
- **5.** Challenges Faced (e.g., barriers to implementation)
- **6. Results Achieved:** (answer applicable measures)
 - Environmental/P2 Benefit
 - Economic Benefit
 - Social Benefit
- 7. Potential for Replication
- **8.** Beneficiary Feedback (e.g., a quote from the business)
- **9. EPA Role** (e.g., EPA P2 grant funding)
- 10. Grantee Contact Information

Appendix E: Examples of P2 Technical Assistance Projects Under this Grant Program

This Appendix provides examples of P2 technical assistance (TA) projects to address environmental and human health impacts (also see <u>Section I.B.</u>). These project examples are illustrative and do not represent all eligible project possibilities. Applicants that cite these examples must still describe how their proposals support the Threshold and Merit Evaluation Criteria. Summaries of previously funded P2 grant projects which could be refined and/or combined to meet the goals of this P2 Grant Program can be found at: https://www.epa.gov/p2/grant-summaries.

- Identify and conduct P2 technical assessments at a business establishment in the disadvantaged community to identify and develop P2 practices, including changing the supply chain inputs to reduce or eliminate the use of hazardous substances, pollutants or contaminants in business operations. Document P2 practices implemented to create transferable lessons for additional businesses.
- In P2 technical assessments, look for opportunities to reduce pollutants discharged by businesses to water that can impact the environment of disadvantaged communities (e.g., reducing the quantity and toxicity of cleaning products which may contaminate water; reducing the use of processing chemicals that contribute to wastewater contamination) and disseminate that information to businesses and impacted disadvantaged communities.
- Work with manufacturers, including small and disadvantaged businesses, and their supply chains, to accelerate substitution of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in products.
- In P2 assessments, look for opportunities to use lower-toxicity products or chemicals which can improve human health and the environment (e.g., for product ingredients, refrigerants, equipment cleaning, building cleaners, food-grade lubrication and processing techniques and equipment) and disseminate that information to local businesses and disadvantaged communities.
- Convene industry roundtables among manufacturers, technical experts, trade associations and impacted disadvantaged communities to exchange information and ideas for P2 approaches that may improve human health and the environment for the disadvantaged communities. Work with businesses to implement some of the P2 approaches identified. Follow up to determine if any P2 practices identified or developed from the roundtables were implemented by business establishments.
- Develop alternative lower-toxicity chemicals or procedures as <u>Green Chemistry</u> solutions (e.g., for solvents, equipment clean-in-place products, building cleaning products) and disseminate that information to businesses impacting disadvantaged communities.
- Conduct trainings for businesses on P2 best practices that can reduce health impacts on disadvantaged communities. Engage the wider community in the training. This work

could target facilities that manufacture, process, or otherwise use chemicals on the TSCA Work Plan or on the TRI list as they potentially pose more harm to human health.

- Conduct trainings for many businesses on P2 best practices being applied in an NEA sector or to demonstrate a technology not widely known.
- Conduct training and P2 outreach to teach groups of businesses to identify and reduce the use of hazardous chemicals, water and energy.
- Assist businesses with reducing or eliminating the manufacture and use of single-use plastics in packaging and/or products manufactured and/or identifying alternative lower-toxicity chemicals to replace additives and processing aides of concern during the plastics manufacturing process.
- Provide P2 awards or certifications to business facilities which recognize adoption of a set of P2 practices, provided these programs are driving the adoption of newly implemented P2 practices as a result of P2 TA provided under this grant. Develop a special training or other outreach emphasis in a State leadership or green certification program to achieve sector-based results.
- Assist businesses within an NEA sector to improve material practices to reduce the risk
 of release of hazardous chemicals during a storm, flooding or other natural disaster
 event. (i.e., inventory practices to reduce the amount of hazardous material stored onsite).
- Identify and target NEA business facilities within environmental justice communities to provide P2 assessments focusing on hazardous materials and/or energy and water use reduction and training.
- Partner with trade associations relevant to the NEA to develop or provide training on P2 practices, or to host roundtables to develop P2 solutions.
- In P2 assessments, look for opportunities to conserve water (e.g., use high-volume, low-pressure washing systems that reuse water; identify practices to minimize loadings to wastewater systems, extend production line times between cleanings to minimize water use, reducing potential combined sewer overflows [CSOs] in disadvantaged communities) and disseminate that information to local businesses and disadvantaged communities.
- Develop a technical P2 analytic tool for an NEA sector.

Appendix F: Budget Guidance and Optional Budget Table Example

Applicants must provide estimated budget amounts by category in their itemized budget (an example is provided at the bottom of this appendix in table format). For all proposed costs, applicants should use whole dollars, with no decimal values. To comply with cost sharing and matching requirements, the itemized budget must indicate the project costs paid by the applicant, EPA, and/or other partners. Selected applicant(s) will need to submit a copy of their current indirect cost rate that has been negotiated with a federal cognizant agency prior to award. Additional guidance for developing the applicant's budget is available in EPA's "Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance." See also RAIN-2019-G02-R1.

For guidance, EPA is providing a list of definitions for the budget categories, and a sample budget below.

Direct Cost Budget Categories:

- i. Personnel: Indicate costs for the salaries and job title of the recipient employees who will perform work directly on the project (generally, paid employees of the applicant organization as reflected in payroll tax records). If the applicant is including staff time (in-kind services) as a cost-share, this should be included as Personnel costs. Personnel cost does not include: 1) costs for services of contractors including consultants ("Contractual" category); 2) costs for employees of sub-recipients under subawards ("Other" category); 3) personnel costs that are not directly in support of the proposed project which may be covered by the organization's indirect cost rate; and 4) compensation for program participants (e.g., stipends or other allowances) such as interns and fellows (other than individual fellowships under 40 CFR Part 46) who are not employees of the recipient organization are participant support costs as provided in 2 CFR § 200.1 ("Other" category). The budget detail must identify the personnel category type by Full Time Equivalent (FTE), including percentage of FTE for part-time employees, number of personnel proposed for each category, and the estimated funding amounts.
- ii. Fringe Benefits: Indicate all mandated and voluntary benefits to be supplemented with the grant funds. Fringe Benefits are allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages. Fringe Benefits may include, but are not limited to, the cost of 1) annual leave, 2) holiday pay, 3) health insurance, 4) retirement contributions, and 5) employer's portion of FICA Insurance. If the applicant's fringe rate does not include the cost of leave, and the applicant intends to charge leave to the grant, it must provide supplemental information describing its proposed method(s) for determining and equitably distributing these costs.
- iii. Travel: Indicate the number of individuals traveling, destination of travel, number of trips, and reason for travel, along with the proposed costs. Applicants should budget for travel costs for one national conference. The itemized budget should include the dollar amount of the expenses for transportation, lodging, subsistence, and related items. Travel may be integral to the purpose of the proposed project (e.g., inspections) or

related to proposed project activities (e.g., attendance at meetings) or to a technical training or workshop that supports effective implementation of the project activities. Under 2 CFR 200.475(d), allowable travel costs may not exceed the rates and amounts for Federal travel unless the recipient's cognizant Federal audit agency (or EPA if requested by the recipient to do so) has accepted a travel policy that provides differently. Federal lodging and per diem rates are available at http://www.gsa.gov/portal/content/104877. The costs of first class and business class transportation are generally not allowable. Finally, if the applicant intends to use any funds for travel outside the United States, it must be specifically identified. All proposed foreign travel must be approved by the EPA's Office of International and Tribal Affairs prior to being taken.

- a. Travel Participants: Only include travel costs for employees of the applicant organization in the travel category. Travel costs for executives (e.g., Governors, Mayors, elected Tribal Leaders) and legislators (including Tribal Council members) are allowable with prior approval by the EPA Award Official if the travel is specifically related to performing an EPA funded project or program. Under 2 CFR 200.475, travel by Trustees, Directors and similar officials with nonprofits or Institutions of Higher Education is allowable as a direct cost only if the travel costs are allocable to an EPA award and not included in the recipient's indirect cost pool.
- **b.** Travel costs do not include: (1) costs for travel of contractors (including consultants), which are included in the "Contractual" category; and (2) travel costs for employees of subrecipients under subawards and non-employee program participants (e.g., trainees), which are included in the "Other" budget category under "participant support costs." Further, travel does not include bus rentals for group trips, which would be covered under the "Contractual" category.
- iv. Equipment: Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. Equipment also includes accessories necessary to make the equipment operational. Equipment does not include: (1) equipment planned to be leased/rented, including lease/purchase agreement; or (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. Pursuant to the definitions of *Equipment* and *Supplies* in 2 CFR § 200.1, items with a unit cost of less than \$5,000 should be categorized as supplies. The budget detail must include an itemized listing of all equipment proposed under the project. If installation costs are included in the equipment costs, labor expenses shall be itemized with the detailed number of hours charged and the hourly wage. If the applicant has written procurement procedures that define a threshold for equipment costs that is lower than \$5,000, then that threshold takes precedence. Note that not all funding programs allow for the purchase of equipment and some programs encourage leasing rather than purchasing equipment. If your project requires the purchase of equipment, you are encouraged to check with the EPA Regional Pollution Prevention contact prior to submitting your application to ensure that the equipment purchases are allowable.
- v. Supplies: Supplies are tangible personal property other than equipment. Recipients

should indicate any items, other than equipment, that will be purchased to support the project. Supplies include such items such as: 1) office supplies, 2) computing devices (e.g., laptops and tablets), 3) monitoring supplies, 4) educational or field supplies, and 5) laboratory supplies. Non-tangible goods and services associated with supplies, such as printing services, photocopy services, and rental costs should be included in the "Other" category.

vi. Contractual Costs: Contractual services (including consultant services) are those services to be carried out by an individual or organization, other than the applicant, in the form of a procurement relationship. EPA's Subaward Policy and EPA Subaward Frequent Questions provides detailed guidance for differentiating between contractors and subrecipients. Leased or rented goods (e.g., equipment or supplies) should be included in the "Other" category. The applicant should list the proposed contract activities along with a brief description of the scope of work or services to be provided, proposed duration, and proposed procurement method (competitive or noncompetitive), if known.

EPA does not require or encourage applicants to procure contractors (including consultants) before the EPA grant is awarded, but applicants may choose to do so. State recipients follow their own procurement rules consistent with 2 CFR 200.317. All other entities must follow the Procurement Standards in 2 CFR Part 200, which generally require full and open competition for purchases in excess of the micro-purchase threshold (generally \$10,000 for most applicants) unless the recipient has an acceptable sole source justification. Note, EPA will not accept a sole source justification for products and services that are available in the commercial marketplace, such as environmental consulting, training services, or research support based on a contention that the contractor has "unique qualifications."

Applicants are advised to not specifically name a contractor, including consultants, in their grant application unless that contractor has been selected in compliance with the Procurement Standards in 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 (EPA's Disadvantaged Business Participation Rule). 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, EPA may require that the applicant demonstrate how securing the contractor's services will meet the Procurement Standards contained in 2 CFR Parts 200 and 1500, as well as 40 CFR Part 33, prior to award. **EPA will not consider the qualifications, experience, and expertise of named contractor(s) during the application evaluation process unless the applicant provides documentation that it has complied with these requirements**.

The EPA encourages applicants to review EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements for additional information on EPA's policies on competitive procurement by EPA financial assistance recipients (including encouraging the use of small and disadvantaged business enterprises as required by 40 CFR Part 33). Additionally, the EPA suggests that applicants review EPA's Subaward Policy and EPA's Subaward Policy Frequent Questions.

Successful applicants that procure a contractor(s) after being advised by the EPA of selection, but prior to award, must describe how they complied with the procurement procedures described above when submitting the final workplan for the award.

Recipients of EPA funding who select a contractor(s) after award must fully comply with the procurement standards at 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

vii. Other: This category should include only those types of direct costs that do not fit in any of the other budget categories. Examples of costs that may be in this category are: insurance; rental/lease of equipment or supplies; equipment service or maintenance contracts; printing or photocopying; participant support costs such as non-employee training stipends and travel, subsidies, or rebates for purchases of pollution control equipment (such as a specified amount of funding for residential woodstove changeouts or truck owners to purchase cleaner trucks); and subaward costs. "Other" does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the "Contractual" category.

Subawards (e.g., subgrants) and participant support costs are distinct types of costs under this category. The term "subaward" means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient even if the agreement is referred to as a contract. Rebates, subsidies, and similar one-time, lump-sum payments to program beneficiaries for purchase of eligible emission control technologies are considered participant support costs.

Applicants should describe the items included in the "Other" category and include the estimated amount of participant support costs in a separate line item. Additionally, applicants must provide the aggregate amount they propose to issue as subaward work as a separate line item in the "Other" category, and a description of the types of activities to be supported. Additional information about participant support costs and subawards is available at: RAIN-2018-G05-R1 and EPA Guidance on Participant Support Costs; EPA's Subaward Policy; and, EPA's Subaward Policy Frequent Questions.

Note, the EPA does not require or encourage applicants to name a specific subrecipient(s) in their grant application. However, if a specific subrecipient is named, the EPA may require that the applicant demonstrate how the proposed subaward complies with the requirements discussed below even if the entity is referred to as a "partner" in the application, prior to award. EPA will not consider the qualifications, experience, and expertise of named subrecipient(s) during the application evaluation process unless the applicant provides documentation that it has complied with these requirements.

EPA may request that applicants that name a specific subrecipient in their application demonstrate that the subrecipient is eligible for a subaward in compliance with the EPA's Subaward Policy. This policy provides, among other things, that transactions between recipients and for-profit firms and individual consultants are procurement contracts rather

than subawards when the transaction involves the acquisition of services from the firm or individual, with very few exceptions.

Successful applicants that do not name a specific subrecipient(s) in their application but identify a subrecipient(s) after being advised of selection and/or award a subaward after the grant is awarded, must also comply with the requirements described above.

- viii. Total Direct Charges: Applicants should include a summary of all costs associated with each line- item category.
- ix. Indirect Costs (IDCs): Indirect costs are those incurred by the recipient for a common or joint purpose that benefit more than one cost objective or project and are not readily assignable to specific cost objectives or projects as a direct cost. Examples of indirect costs include: 1) insurance, 2) publication costs, 3) occasional document reproduction at self service firms (staples), 4) communication costs, and 5) rental/lease of equipment or supplies.
 - **a. Indirect Cost Rate:** For IDCs, grant recipients with a current Approved Indirect Cost Agreement or a current Indirect Cost Proposal submitted to their cognizant agency, need to demonstrate that they have a current or proposed rate. Organization must provide documentation of a federally approved indirect cost rate (percentage) reflective of proposed project/grant period. Applicant should indicate if organization is in negotiations with appropriate federal agency to obtain a new rate. Please refer to EPA Solicitation Clauses Section VI.u. on indirect costs for competitions for more information.

In the itemized budget, applicants should:

- Indicate the approved rate and base and the date that rate will be active until, if applicable. For example, Federal Negotiated Indirect Cost Rate = 10% (Indirect Rate x Personnel = Indirect Costs)
- Applicant should indicate if organization is in negotiations with appropriate federal agency to obtain a new rate.
 - Examples of Indirect Cost Rate calculations are shown below:
 - Personnel (Indirect Rate x Personnel = Indirect Costs)
 - Personnel and Fringe (Indirect Rate x Personnel & Fringe = Indirect Costs)
 - Total Direct Costs (Indirect Rate x Total direct costs = Indirect Costs)
 - Direct Costs minus distorting or other factors such as contracts and equipment

Additional indirect cost guidance is available in <u>RAIN-2018-G02</u>, "<u>Indirect Cost Guidance</u> for Recipients of EPA Assistance Agreements."

x. Additional Guidance: If the proposal includes conferences or workshops that the recipient will conduct or includes activities during which meals and/or light refreshments will be provided, the recipient <u>must</u> respond to each of the following prompts in their budget description.

- **a. Guidance on Conferences and Workshops** (2 CFR 200.432, 200.438, 200.456, and 200.475):
 - Applicants may include costs to use federal grant dollars to support the facilitation, hosting/co-hosting of P2 focused events and/or to attend inperson P2 focused events. Events must be regional or national in scale and scope and will need to address providing technical assistance (outreach, training, videos) to businesses and/or the sharing of P2 best practices and lessons learned with others. Federal dollars awarded under this program may not be used to facilitate or directly benefit EPA-led/sponsored events.
 - If the proposal includes conferences or workshops that the recipient will conduct, the recipient <u>must</u> respond to each of the following prompts in their budget description:
 - Briefly describe the conference or workshop.
 - Who is initiating the conference or workshop?
 - Whose logo will be on the agenda and conference, workshop, and meeting materials?
 - What is the expected percentage distribution of the persons attending the conference, workshop, or meeting (i.e., percent of federal, state, local, or public participants)?
 - Is the recipient going to conduct the proceedings or analysis/analyses and disseminate this information back to the appropriate state, local, and scientific community?
 - Does the recipient anticipate any program income being generated from the conference, workshop, or meeting, including registration fees?

b. Guidance on Meals and Refreshments:

If the proposed budget detail includes activities during which meals and/or light refreshments will be provided, the recipient <u>must</u> address each of the following in their budget description:

- Briefly describe the event where meals and/or light refreshments will be provided and provide an estimated cost for the event.
- Will those attending the event receive a per diem financed through grant funds?
- Why is the provision of light refreshments and/or meals necessary to achieve the objectives of the assistance agreement?
- Why is the provision of light refreshments and/or meals necessary to achieve the objectives of the event?
- When will meals and/or light refreshments be made available (before, during, or after the event)?
- For further guidance on costs associated with conferences and workshops and meals and light refreshments, please see the Office of Grants and Debarment (OGD) Guidance on Selected Items of Cost.

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

Optional Budget Table Example:

Budget Category	Budget Items	Application Request (\$)
Personnel	 Project Manager @ \$75,000 annual salary X 100% of time on project = \$150,000 for two years Outreach worker @ \$35,000 annual salary X 20% of time on project = \$21,000 Community support leader @ \$20,000 annual salary X 15% = \$9,000 	\$180,000
Fringe Benefits	 Project Manager 15% of salary (includes medical, dental, life insurance) = \$22,500 for two years Outreach worker 10% of salary (includes medical, dental, life insurance) = \$10,500 Community support leader 10% of salary (includes medical, dental, life insurance) = \$6,000 	\$39,000
Travel	 Local mileage for Project Manager to attend quarterly partner meetings at State Capital: 25 miles @ \$0.55/mi. X 48 meetings = \$660.00 Local mileage for Outreach worker to conduct monthly community outreach efforts within Howard County: 15 miles @ \$0.55/mi. X 30 times X 24 months = \$5,940 Travel to EPA National P2 Grantee Meeting in Atlanta, GA: Per diem - \$30 per day X 3 days = \$90; Airfare = \$1,500 	\$8,190
Equipment	Note: Equipment costs that are integral to implementing the P2 grant activity may be purchased using P2 grant funds. Costs to purchase equipment should be noted as a "Direct" cost under the "Equipment" category. Costs for renting equipment should be noted under the "Other" budget category. EPA will make the determination on a case-bycase basis that proposed equipment costs are reasonable and necessary to implement the project and costs adhere to the regulations of 2 CFR 200.313, including the provisions governing the priority for use of the equipment	\$0

	(2 CFR 200.313(c)), management of the equipment (2 CFR 200.313(d)), and disposition of the equipment (2 CFR 200.313(e)).	
Supplies	 30 reams of copy paper @ \$4.00 to print outreach materials to technical assistance recipients = \$120 Laptop computer for Outreach worker to work off-site on community \$1,500 Miscellaneous supplies for staff on this project = \$1,510 2 Air Monitors: 2 air monitors X \$3,830 = \$7,660.00 2 Filters (500 filter): 2 filters X \$2,000 = \$4,000 	\$14,040
Contractual	 Bookkeeper/Accountant \$22.5/hr. @ 3 hrs./week @ 104 weeks = \$7,020 Contract with Lab to conduct tests @\$45 X 750 = \$33,750 Data Processing Contract=\$45,000 (provide details regarding the purpose of the contract if possible) 	\$85,770
Construction	NOTE -Construction related activities may include heavy machinery rental costs, demolition-related costs, and costs related to building structures	\$0
Indirect Costs	IDC Rate Agreement of 20% of Salaries and Wages (\$150,000 X 20%) See attached indirect cost rate agreement	\$30,000
Other (includes subawards and specific participant support costs such as stipends)	 Subaward to CBO to conduct outreach activities and project recruitment = \$34,800 (see Budget Description for more details) Participant Support Costs (stipends for community members attending meetings at \$50 per attendee X 160 attendees) = \$8,000 Fee to present project results at industry meeting = \$200 	\$43,000
Total Project Costs		\$400,000*

^{*} The total EPA funding requested here and the total costs for each budget category should match the total costs in the applicant's SF-424A.

Appendix G: Grants.gov Instructions and Limited Exception Procedures

A. Requirement to Submit Through Grants.gov and Limited Exception Procedures

Applicants must apply electronically through <u>Grants.gov</u> under this funding opportunity based on the Grants.gov instructions provided in this appendix. If your organization has no access to the Internet or access is very limited, you may request an exception for the remainder of this calendar year by following the procedures outlined <u>here.</u> Please note that your request must be received at least <u>fifteen calendar days before the application due date to allow enough time to negotiate alternative submission methods</u>. Issues with submissions with respect to this opportunity only are addressed in Section C. *Technical Issues with Submission* below.

B. How to Register and Apply:

NOTE: Registering in SAM.gov or Grants.gov can take a month or more. Applicants are advised to begin their registration process early, so it does not interfere with drafting the application near the deadline.

Applicants should visit EPA's page on <u>How to Register to Apply for Grants</u> for additional information. All EPA grant applications must be submitted online, except in limited circumstances. Organizations must be registered in two federal government systems to apply for EPA grants:

- 1. <u>SAM.gov</u> registers organizations to conduct business with the U.S. Government, which includes federal grants.
- 2. <u>Grants.gov</u> is the official system for managing all federal grant applications.

These two systems share information. Together, they provide access to everything needed to identify federal grant opportunities and to complete the online application process.

Note that individuals can access both systems through a single user account set up in Login.gov. Creating a Login.gov account is easy. If you do not have a Login.gov account, you will be prompted to create one when you register with <u>SAM.gov</u> or <u>Grants.gov</u>. <u>Learn more about Login.gov</u>.

If you have done business with the federal government previously, you can and should check your entity status using your government issued Unique Entity Identifier (UEI) to determine if your registration is active. <u>SAM.gov</u> requires you renew your registration every 365 days to keep it active. Organizations should ensure that their <u>SAM.gov</u> registration includes a current E-Business (Ebiz) point of contact name and email address. The Ebiz point of contact is critical for Grants.gov Registration and system functionality. If the point of contact has changed, you may need to contact the <u>Federal Service Desk</u> for help with your <u>SAM.gov</u> account: (866) 606-8220. The Federal Service desk hours of operation are Monday – Friday, 8 AM– 8 PM (ET).

Please note that <u>SAM.gov</u> registration is different than obtaining a UEI only. Obtaining an UEI only validates your organization's legal business name and address. Please review the <u>Frequently Asked Questions</u> document for additional details.

Follow these steps to register to apply for EPA grants. **Start the registration process early**. The process can take a month or more. Errors or inconsistencies in registration in the two systems can prolong the process. Applicants are encouraged to start the registration process **before you begin working on your application**.

Step 1. Register Your Organization in SAM.gov

Organizations must register with <u>SAM.gov</u> to obtain a UEI, which is a 12-character alphanumeric identifier assigned to each unique organization. There is no fee for registering with <u>SAM.gov</u> and registration must be renewed annually.

Registration in <u>SAM.gov</u> requires providing assertions, representations and certifications, and other information so that the federal government can verify the existence and uniqueness of the organization.

Follow these steps to get started:

- 1. Go to the <u>SAM.gov Entity Registration</u> page. Review the "Before You Get Started" section and download the Entity Registration Checklist to help prepare.
- 2. Click the "Get Started" button when you are ready. You may be prompted to accept the usage terms and sign in through Login.gov. If necessary, click the "Get Started" button again after you sign in.
- 3. You will be prompted to choose what you want to do. Most grant applicants will select the option to "Register for Financial Assistance Awards Only."
- 4. Select the appropriate option and click the Next button. Proceed through the registration process by answering the questions and providing the necessary information.

Organizations will need to designate an E-Business Point of Contact (Ebiz POC). The Ebiz POC is likely to be your organization's Chief Financial Officer or authorizing official. There can be only one Ebiz POC for each unique organization. The Ebiz POC will:

- 1. Set up the Grants.gov profile for the organization (see Step 2 below).
- 2. Oversee all activities for the organization within Grants.gov.
- 3. Assign all roles in Grants.gov for individuals from the organization who will be involved in applying for grants, including the Authorized Organization Representative (AOR), Expanded AOR roles, Workspace Manager, and Custom roles (see Step 3 below).

Note: The Ebiz POC does not submit grant proposals for the organization. Proposals are submitted by the AOR in <u>Grants.gov</u>. After the information submitted through the registration

process is authenticated, the Ebiz POC will receive an email from <u>SAM.gov</u> indicating that the registration is active.

Contact the <u>Federal Service Desk</u> for help with your <u>SAM.gov</u> account, to resolve technical issues or chat with a help desk agent: (866) 606-8220. The Federal Service desk hours of operation are Monday – Friday, 8 AM – 8 PM (ET).

Once your <u>SAM.gov</u> account is active, you must register in <u>Grants.gov</u>. Grants.gov will electronically receive your organization information, such as Ebiz POC email address and UEI.

Step 2. Create a User Account and Applicant Profile in Grants.gov

After obtaining a UEI, an organization must create an applicant profile in Grants.gov.

The Ebiz POC will set up the applicant profile in 2 steps:

- 1. Create a user account in <u>Grants.gov</u> with the same email address used by the Ebiz POC in <u>SAM.gov</u>. The email address is used to match the Ebiz POC from <u>SAM.gov</u> to <u>Grants.gov</u>.
- 2. Create the applicant profile in Grants.gov using the UEI obtained from SAM.gov.

Grants.gov registration is FREE. If you have never applied for a federal grant before, please review the Grants.gov applicant registration instructions. As part of the Grants.gov registration process, the Ebiz point of contact is the only person that can affiliate and assign applicant roles to members of an organization. In addition, at least one person must be assigned as an AOR. Only person(s) with the AOR role can submit applications in Grants.gov. Please review the Intro to Grants.gov - Understanding User Roles and Learning Workspace – User Roles and Workspace Actions for details on this important process. Applicants need to ensure that the AOR who submits the application through Grants.gov and whose UEI is listed on the application is an AOR for the applicant listed on the application. Additionally, the UEI listed on the application must be registered to the applicant organization's SAM.gov account. If not, the application may be deemed ineligible.

Contact <u>Grants.gov</u> for assistance at 1-800-518-4726 or <u>support@grants.gov</u> to resolve technical issues with <u>Grants.gov</u>. Applicants who are outside the U.S. at the time of submittal and are not able to access the toll-free number may reach a Grants.gov representative by calling 606-545-5035. The <u>Grants.gov</u> Support Center is available 24 hours a day, 7 days a week, excluding federal holidays.

Step 3. Create Individual Grants.gov Accounts for Organization Members

There is no fee for registering with <u>Grants.gov</u>. Each member of the organization who will participate in the online grant application process needs to register an individual account on Grants.gov.

- 1. Go to the <u>Grants.gov registration</u> page.
- 2. Complete the form, which includes specifying a username and password. This username and password are used to create the Grants.gov account. You will be prompted to link the Grants.gov account to your Login.gov account.
- 3. Associate your individual account with the organization's UEI. You will also enter the organization's Profile Name and your Job Title.

The organization's Ebiz POC can delegate administrative roles to other Grants.gov users associated with the UEI, as necessary. Learn more about managing roles in Grants.gov.

Step 4. Learn How to Use Workspace in Grants.gov

Workspace is the application in <u>Grants.gov</u> that an organization's grant team uses when applying for federal grants. Workspace is a role-based tool, in which the user's assigned role controls permissions to perform specific actions, such as accessing and editing application forms. As noted in Step 3 above, the Ebiz POC has the initial responsibility to assign roles to individuals.

The core roles include:

- Expanded AOR: has the most privileges.
- Standard AOR: allows user to submit the final application and perform other actions.
- Workspace Manager: the minimum role required to create a workspace and begin work on an application.

Custom roles can also be created. Becoming familiar with <u>Grants.gov</u> workspace roles and understanding the process will help applicants be better prepared to submit applications. The videos <u>on this page</u> are just two of many <u>Grants.gov</u> training resources to help applicants get started.

1. Application Submission Process

To begin, go to <u>Grants.gov</u> and click the "Search Grants" tab to search the opportunity number associated with this funding opportunity – EPA-HQ-OCSPP-OPPT-FY2024-002. Once the opportunity has been selected, click the red "Apply" button at the top of the View Grant Opportunity page.

- **a.** The electronic submission of your application to this funding opportunity must be made by an official representative of your organization who is registered with <u>Grants.gov</u> and is authorized to sign applications for Federal financial assistance. If the submit button is grayed out, it may be because you do not have the appropriate role to submit in your organization. Contact your organization's EBiz point of contact or contact <u>Grants.gov</u> for assistance at 1-800-518-4726 or support@grants.gov.
- **b.** Applicants need to ensure that the Authorized Organization Representative (AOR) who submits the application through <u>Grants.gov</u> and whose UEI is listed on the application is an AOR for the applicant listed on the application. Additionally, the

UEI listed on the application must be registered to the applicant organization's <u>SAM.gov</u> account. If not, the application may be deemed ineligible.

c. Applications submitted through <u>Grants.gov</u> will be time and date stamped electronically. Please note that successful submission of your application through <u>Grants.gov</u> does not necessarily mean your application is eligible for award. Any application submitted after the <u>May 17, 2024, at 11:59 PM (ET) application submission deadline</u> will be deemed ineligible and will not be considered.

2. Technical Issues with Submission

If applicants experience technical issues during the submission of an application that they are unable to resolve, follow these procedures **before** the application submission deadline:

- a. Contact Grants.gov Support Center before the application submission deadline.
- **b.** Document the Grants.gov ticket/case number.
- c. Send an email with "Technical Issues with Submission" in the subject line to p2grants@epa.gov before the application submission deadline and must include the following:
 - Grants.gov ticket/case number(s)
 - Description of the issue
 - The entire application package in PDF format.

Without this information, EPA may not be able to consider applications submitted outside of <u>Grants.gov</u>. Any application submitted after the application deadline time and date deadline will be deemed ineligible and **not** be considered.

Please note that successful submission through <u>Grants.gov</u> or email does not necessarily mean your application is eligible for award.

EPA will make decisions concerning acceptance of each application submitted outside of Grants.gov on a case-by-case basis. EPA will only consider accepting applications that were unable to submit through Grants.gov or relevant SAM.gov system issues or for unforeseen exigent circumstances, such as extreme weather interfering with internet access. Failure of an applicant to submit prior to the application submission deadline date because they did not properly or timely register in SAM.gov or Grants.gov is not an acceptable reason to justify acceptance of an application outside of Grants.gov.

3. **Application Materials**

Please refer to Section IV.C.1 of this announcement for required forms and documents.

Appendix H: NEAs with Applicable NAICS codes

1. Food and Beverage Manufacturing and Processing: Carry out P2 technical assistance(TA) and projects to support more sustainable food and beverage manufacturing and processing entities in North American Industry Classification System (NAICS) codes 311 and 3121 resulting in reduced toxic air emissions or water discharges, water or energy usage, hazardous materials generation and use. TA projects or activities associated with entities that are not included under NAICS codes 311 or 3121, such as restaurants, grocery stores and other retail establishments do not qualify for this NEA.

NAICS Codes:

<u>311</u>	Food Manufacturing
<u>3111</u>	Animal Food Manufacturing
<u>31111</u>	Animal Food Manufacturing
<u>311111</u>	Dog and Cat Food Manufacturing
<u>311119</u>	Other Animal Food Manufacturing
<u>3112</u>	Grain and Oilseed Milling
<u>31121</u>	Flour Milling and Malt Manufacturing
<u>311211</u>	Flour Milling
<u>311212</u>	Rice Milling
<u>311213</u>	Malt Manufacturing
<u>31122</u>	Starch and Vegetable Fats and Oils Manufacturing
<u>311221</u>	Wet Corn Milling and Starch Manufacturing
<u>311224</u>	Soybean and Other Oilseed Processing
<u>311225</u>	Fats and Oils Refining and Blending
<u>31123</u>	Breakfast Cereal Manufacturing

<u>311230</u>	Breakfast Cereal Manufacturing
3113	Sugar and Confectionery Product Manufacturing
<u>31131</u>	Sugar Manufacturing
<u>311313</u>	Beet Sugar Manufacturing
<u>311314</u>	Cane Sugar Manufacturing
<u>31134</u>	Nonchocolate Confectionery Manufacturing
<u>311340</u>	Nonchocolate Confectionery Manufacturing
<u>31135</u>	Chocolate Confectionery Manufacturing
<u>311351</u>	Chocolate Confectionery Manufacturing from Cacao Beans
311352	Confectionery Manufacturing from Purchased Chocolate
<u>3114</u>	Fruit and Vegetable Preserving and Specialty Food Manufacturing
<u>31141</u>	Frozen Food Manufacturing
311411	Frozen Fruit, Juice, and Vegetable Manufacturing
<u>311412</u>	Frozen Specialty Food Manufacturing
<u>31142</u>	Fruit and Vegetable Canning, Pickling, and Drying
<u>311421</u>	Fruit and Vegetable Canning
<u>311422</u>	Specialty Canning
<u>311423</u>	Dried and Dehydrated Food Manufacturing
<u>3115</u>	Dairy Product Manufacturing
<u>31151</u>	Dairy Product (except Frozen) Manufacturing

311512	Creamery Butter Manufacturing
311513	Cheese Manufacturing
311514	Dry, Condensed, and Evaporated Dairy Product Manufacturing
<u>31152</u>	Ice Cream and Frozen Dessert Manufacturing
<u>311520</u>	Ice Cream and Frozen Dessert Manufacturing
<u>3116</u>	Animal Slaughtering and Processing
<u>31161</u>	Animal Slaughtering and Processing
<u>311611</u>	Animal (except Poultry) Slaughtering
<u>311612</u>	Meat Processed from Carcasses
<u>311613</u>	Rendering and Meat Byproduct Processing
<u>311615</u>	Poultry Processing
<u>3117</u>	Seafood Product Preparation and Packaging
	1
<u>31171</u>	Seafood Product Preparation and Packaging
<u>31171</u>	Seafood Product Preparation and Packaging
31171 311710	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging
31171 311710 3118	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing
31171 311710 3118 31181	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing Bread and Bakery Product Manufacturing
31171 311710 3118 31181 311811	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing Bread and Bakery Product Manufacturing Retail Bakeries
31171 311710 3118 31181 311811 311812	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing Bread and Bakery Product Manufacturing Retail Bakeries Commercial Bakeries Frozen Cakes, Pies, and Other Pastries
31171 311710 3118 31181 311811 311812 311813	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing Bread and Bakery Product Manufacturing Retail Bakeries Commercial Bakeries Frozen Cakes, Pies, and Other Pastries Manufacturing
31171 311710 3118 31181 311811 311812 311813	Seafood Product Preparation and Packaging Seafood Product Preparation and Packaging Bakeries and Tortilla Manufacturing Bread and Bakery Product Manufacturing Retail Bakeries Commercial Bakeries Frozen Cakes, Pies, and Other Pastries Manufacturing Cookie, Cracker, and Pasta Manufacturing

<u>311830</u>	Tortilla Manufacturing
<u>3119</u>	Other Food Manufacturing
<u>31191</u>	Snack Food Manufacturing
<u>311911</u>	Roasted Nuts and Peanut Butter Manufacturing
311919	Other Snack Food Manufacturing
<u>31192</u>	Coffee and Tea Manufacturing
<u>311920</u>	Coffee and Tea Manufacturing
<u>31193</u>	Flavoring Syrup and Concentrate Manufacturing
311930	Flavoring Syrup and Concentrate Manufacturing
31194	Seasoning and Dressing Manufacturing
311941	Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing
311942	Spice and Extract Manufacturing
31199	All Other Food Manufacturing
<u>311991</u>	Perishable Prepared Food Manufacturing
31211	Soft Drink and Ice Manufacturing
312112	Bottled Water Manufacturing
312113	Ice Manufacturing

<u>31212</u>	Breweries
<u>312120</u>	Breweries
31213	Wineries
312130	Wineries
31214	Distilleries
<u>312140</u>	Distilleries

2. Chemical Manufacturing, Processing and Formulation: Carry out P2 TA and projects with businesses normally associated with NAICS code 325 and associated subsectors (4-6 digit NAICS codes under 325). Projects under this NEA should facilitate and encourage businesses within this NAICS code to identify, develop, and adopt P2 practices in the production of their chemical products and formulations. Projects can also include working with businesses within this NAICS code to promote research, development, and marketing of green chemistry products and processes that reduce or eliminate the generation of hazardous substances.

NAICS Codes:

<u>325</u>	Chemical Manufacturing
<u>3251</u>	Basic Chemical Manufacturing
<u>32511</u>	Petrochemical Manufacturing
<u>325110</u>	Petrochemical Manufacturing
<u>32512</u>	Industrial Gas Manufacturing
<u>325120</u>	Industrial Gas Manufacturing
<u>32513</u>	Synthetic Dye and Pigment Manufacturing
<u>325130</u>	Synthetic Dye and Pigment Manufacturing
<u>32518</u>	Other Basic Inorganic Chemical Manufacturing
<u>325180</u>	Other Basic Inorganic Chemical Manufacturing
<u>32519</u>	Other Basic Organic Chemical Manufacturing

<u>325193</u>	Ethyl Alcohol Manufacturing
325194	Cyclic Crude, Intermediate, and Gum and Weed Chemical Manufacturing
325199	All Other Basic Organic Chemical Manufacturing
<u>3252</u>	Resin, Synthetic Rubber, and Artificial and Synthetic Fibers and Filaments Manufacturing
<u>32521</u>	Resin and Synthetic Rubber Manufacturing
<u>325211</u>	Plastics Material and Resin Manufacturing
325212	Synthetic Rubber Manufacturing
32522	Artificial and Synthetic Fibers and Filaments Manufacturing
325220	Artificial and Synthetic Fibers and Filaments Manufacturing
<u>3253</u>	Pesticide, Fertilizer, and Other Agricultural Chemical Manufacturing
<u>32531</u>	Fertilizer and Compost Manufacturing
325311	Nitrogenous Fertilizer Manufacturing
325312	Phosphatic Fertilizer Manufacturing
325314	Fertilizer (Mixing Only) Manufacturing
32532	Pesticide and Other Agricultural Chemical Manufacturing
325320	Pesticide and Other Agricultural Chemical Manufacturing
<u>3254</u>	Pharmaceutical and Medicine Manufacturing
<u>32541</u>	Pharmaceutical and Medicine Manufacturing
325411	Medicinal and Botanical Manufacturing
325412	Pharmaceutical Preparation Manufacturing
<u>325413</u>	In-Vitro Diagnostic Substance Manufacturing
<u>325414</u>	Biological Product (except Diagnostic) Manufacturing
<u>3255</u>	Paint, Coating, and Adhesive Manufacturing

<u>32551</u>	Paint and Coating Manufacturing
325510	Paint and Coating Manufacturing
32552	Adhesive Manufacturing
325520	Adhesive Manufacturing
<u>3256</u>	Soap, Cleaning Compound, and Toilet Preparation Manufacturing
<u>32561</u>	Soap and Cleaning Compound Manufacturing
<u>325611</u>	Soap and Other Detergent Manufacturing
325612	Polish and Other Sanitation Good Manufacturing
325613	Surface Active Agent Manufacturing
32562	Toilet Preparation Manufacturing
<u>3259</u>	Other Chemical Product and Preparation Manufacturing
<u>32591</u>	Printing Ink Manufacturing
325910	Printing Ink Manufacturing
32592	Explosive Manufacturing
325920	Explosive Manufacturing
32599	All Other Chemical Product and Preparation Manufacturing
325991	Custom Compounding of Purchased Resins
325992	Photographic Film, Paper, Plate, and Chemical Manufacturing
325998	All other Miscellaneous Chemical Product and Preparation Manufacturing

3. Automotive Manufacturing and Maintenance: Carry out P2 TA and projects with businesses in the automotive industry, normally associated with NAICS codes <u>3361</u>, <u>3362</u>, <u>3363</u>, and <u>8111</u> and associated subsectors. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop and adopt P2 practices in

manufacturing and maintenance of automobiles and automotive products.

NAICS Codes

<u>3361</u>	Motor Vehicle Manufacturing
<u>33611</u>	Automobile and Light Duty Motor Vehicle Manufacturing
<u>336110</u>	Automobile and Light Duty Motor Vehicle Manufacturing
<u>33612</u>	Heavy Duty Truck Manufacturing
336120	Heavy Duty Truck Manufacturing
<u>3362</u>	Motor Vehicle Body and Trailer Manufacturing
<u>33621</u>	Motor Vehicle Body and Trailer Manufacturing
336211	Motor Vehicle Body Manufacturing
336212	Truck Trailer Manufacturing
<u>336213</u>	Motor Home Manufacturing
336214	Travel Trailer and Camper Manufacturing
<u>3363</u>	Motor Vehicle Parts Manufacturing
3363 33631	Motor Vehicle Parts Manufacturing Motor Vehicle Gasoline Engine and Engine Parts Manufacturing
	Motor Vehicle Gasoline Engine and Engine Parts
33631	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Gasoline Engine and Engine Parts
33631 336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Electrical and Electronic Equipment
33631 336310 33632	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Electrical and Electronic Equipment Manufacturing Motor Vehicle Electrical and Electronic Equipment
336310 33632 336320	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Gasoline Engine and Engine Parts Manufacturing Motor Vehicle Electrical and Electronic Equipment Manufacturing Motor Vehicle Electrical and Electronic Equipment Manufacturing Motor Vehicle Steering and Suspension Components (except

336340	Motor Vehicle Brake System Manufacturing
<u>33635</u>	Motor Vehicle Transmission and Power Train Parts Manufacturing
336350	Motor Vehicle Transmission and Power Train Parts Manufacturing
<u>33636</u>	Motor Vehicle Seating and Interior Trim Manufacturing
<u>336360</u>	Motor Vehicle Seating and Interior Trim Manufacturing
<u>33637</u>	Motor Vehicle Metal Stamping
336370	Motor Vehicle Metal Stamping
33639	Other Motor Vehicle Parts Manufacturing
336390	Other Motor Vehicle Parts Manufacturing
<u>8111</u>	Automotive Repair and Maintenance
81111	Automotive Mechanical and Electrical Repair and Maintenance
811111	General Automotive Repair
811114	Specialized Automotive Repair
<u>81112</u>	Automotive Body, Paint, Interior, and Glass Repair
<u>811121</u>	Automotive Body, Paint, and Interior Repair and Maintenance
81112281112	Automotive Glass Replacement Shops Automotive Body, Paint, Interior, and Glass Repair
81119811121	Other Automotive Repair and Maintenance Automotive Body, Paint, and Interior Repair and Maintenance
811191811122	Automotive Oil Change and Lubrication Shops Automotive Glass Replacement Shops
81119281119	Car Washes Other Automotive Repair and Maintenance
811198811191	All Other Automotive Repair and Maintenance Automotive Oil Change and Lubrication Shops

4. Aerospace Product and Parts Manufacturing and Maintenance:

Carry out P2 TA and projects with businesses in the aerospace industry, normally associated with NAICS codes <u>3364</u> and subsectors for manufacture and <u>488190</u> for maintenance. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop, and adopt P2 practices in any aspect of aerospace product and parts manufacturing and maintenance.

NAICS Codes:

<u>3364</u>	Aerospace Product and Parts Manufacturing
<u>33641</u>	Aerospace Product and Parts Manufacturing
<u>336411</u>	Aircraft Manufacturing
<u>336412</u>	Aircraft Engine and Engine Parts Manufacturing
<u>336413</u>	Other Aircraft Parts and Auxiliary Equipment Manufacturing
<u>336414</u>	Guided Missile and Space Vehicle Manufacturing
<u>336415</u>	Guided Missile and Space Vehicle Propulsion Unit and Propulsion
	Unit Parts Manufacturing
226410	Other Guided Missile and Space Vehicle Parts and Auxiliary
<u>336419</u>	Equipment Manufacturing
<u>488190</u>	Other Support Activities for Air Transportation

5. Metal Manufacturing and Fabrication: Carry out P2 TA and projects with businesses normally associated with NAICS codes 331 and 332, which are businesses associated with primary metal manufacturing and/or fabricated metal manufacturing and subsectors. Primary metal manufacturing is associated with smelting and/or refining ferrous and nonferrous metals from ore, pig or scrap, using electrometallurgical and other process metallurgical techniques. Fabricated metal product manufacturing includes transforming metal into intermediate or end products, such as forging, stamping, bending, forming, and machining, used to shape individual pieces of metal; and other processes, such as electroplating, polishing, coating, welding and assembling. Projects under this NEA should facilitate and encourage businesses within these NAICS codes to identify, develop and adopt P2 practices in any aspect of primary metal manufacturing and/or fabricated metal manufacturing and subsectors.

NAICS Codes:

<u>331</u>	Primary Metal Manufacturing
<u>3311</u>	Iron and Steel Mills and Ferroalloy Manufacturing
33111	Iron and Steel Mills and Ferroalloy Manufacturing
331110	Iron and Steel Mills and Ferroalloy Manufacturing
3312	Steel Product Manufacturing from Purchased Steel
33121	Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
331210	Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
33122	Rolling and Drawing of Purchased Steel
331221	Rolled Steel Shape Manufacturing
331222	Steel Wire Drawing
<u>3313</u>	Alumina and Aluminum Production and Processing
33131	Alumina and Aluminum Production and Processing
331313	Alumina Refining and Primary Aluminum Production
331314	Secondary Smelting and Alloying of Aluminum
<u>331315</u>	Aluminum Sheet, Plate, and Foil Manufacturing
331318	Other Aluminum Rolling, Drawing, and Extruding
3314	Nonferrous Metal (except Aluminum) Production and Processing
33141	Nonferrous Metal (except Aluminum) Smelting and Refining
<u>331410</u>	Nonferrous Metal (except Aluminum) Smelting and Refining
33142	Copper Rolling, Drawing, Extruding, and Alloying
331420	Copper Rolling, Drawing, Extruding, and Alloying

33149	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, Extruding, and Alloying
<u>331491</u>	Nonferrous Metal (except Copper and Aluminum) Rolling, Drawing, and Extruding
331492	Secondary Smelting, Refining, and Alloying of Nonferrous Metal (except Copper and Aluminum)
<u>3315</u>	Foundries
<u>33151</u>	Ferrous Metal Foundries
<u>331511</u>	Iron Foundries
<u>331512</u>	Steel Investment Foundries
<u>331513</u>	Steel Foundries (except Investment)
<u>33152</u>	Nonferrous Metal Foundries
<u>331523</u>	Nonferrous Metal Die-Casting Foundries
<u>331524</u>	Aluminum Foundries (except Die-Casting)
<u>331529</u>	Other Nonferrous Metal Foundries (except Die-Casting)
<u>332</u>	Fabricated Metal Product Manufacturing
<u>3321</u>	Forging and Stamping
<u>33211</u>	Forging and Stamping
<u>332111</u>	Iron and Steel Forging
<u>332112</u>	Nonferrous Forging
<u>332114</u>	Custom Roll Forming
<u>332117</u>	Powder Metallurgy Part Manufacturing
332119	Metal Crown, Closure, and Other Metal Stamping (except Automotive)
<u>3322</u>	Cutlery and Handtool Manufacturing
33221	Cutlery and Handtool Manufacturing

<u>332215</u>	Metal Kitchen Cookware, Utensil, Cutlery, and Flatware (except Precious) Manufacturing
<u>332216</u>	Saw Blade and Handtool Manufacturing
3323	Architectural and Structural Metals Manufacturing
33231	Plate Work and Fabricated Structural Product Manufacturing
<u>332311</u>	Prefabricated Metal Building and Component Manufacturing
332312	Fabricated Structural Metal Manufacturing
332313	Plate Work Manufacturing
33232	Ornamental and Architectural Metal Products Manufacturing
332321	Metal Window and Door Manufacturing
332322	Sheet Metal Work Manufacturing
332323	Ornamental and Architectural Metal Work Manufacturing
<u>3324</u>	Boiler, Tank, and Shipping Container Manufacturing
<u>33241</u>	Power Boiler and Heat Exchanger Manufacturing
<u>332410</u>	Power Boiler and Heat Exchanger Manufacturing
33242	Metal Tank (Heavy Gauge) Manufacturing
332420	Metal Tank (Heavy Gauge) Manufacturing
33243	Metal Can, Box, and Other Metal Container (Light Gauge) Manufacturing
332431	Metal Can Manufacturing
<u>3325</u>	Hardware Manufacturing
3325 33251	Hardware Manufacturing Hardware Manufacturing
	_
33251	Hardware Manufacturing
33251 332510	Hardware Manufacturing Hardware Manufacturing

332618	Other Fabricated Wire Product Manufacturing
3327	Machine Shops; Turned Product; and Screw, Nut and Bolt Manufacturing
<u>33271</u>	Machine Shops
<u>332710</u>	Machine Shops
<u>33272</u>	Turned Product and Screw, Nut, and Bolt Manufacturing
<u>332721</u>	Precision Turned Product Manufacturing
332722	Bolt, Nut, Screw, Rivet, and Washer Manufacturing
<u>3328</u>	Coating, Engraving, Heat Treating, and Allied Activities
<u>33281</u>	Coating, Engraving, Heat Treating, and Allied Activities
<u>332811</u>	Metal Heat Treating
332812	Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers
332813	Electroplating, Plating, Polishing, Anodizing, and Coloring
<u>3329</u>	Other Fabricated Metal Product Manufacturing
<u>33291</u>	Metal Valve Manufacturing
<u>332911</u>	Industrial Valve Manufacturing
332912	Fluid Power Valve and Hose Fitting Manufacturing
332913	Plumbing Fixture Fitting and Trim Manufacturing
<u>332919</u>	Other Metal Valve and Pipe Fitting Manufacturing
<u>33299</u>	All Other Fabricated Metal Product Manufacturing
<u>332991</u>	Ball and Roller Bearing Manufacturing
332992	Small Arms Ammunition Manufacturing
332993	Ammunition (except Small Arms) Manufacturing
332994	Small Arms, Ordnance, and Ordnance Accessories Manufacturing

332996	Fabricated Pipe and Pipe Fitting Manufacturing
332999	All Other Miscellaneous Fabricated Metal Product Manufacturing

6. Supporting Pollution Prevention in Indian Country and for Alaska Native Villages: This NEA is only available to federally recognized tribes and intertribal consortia: Carry out P2 TA and projects with businesses in Indian country and Alaska Native Villages. Projects under this NEA should facilitate and encourage businesses and their facilities in Indian country or in Alaska Native Villages to identify, develop and adopt P2 practices and do not need to support the previous five NEAs or any other specific industrial sector. Note: TA may also be provided to businesses operated by the federally-recognized tribe or intertribal consortium and/or to businesses located in Indian country or in Alaska Native Villages

NAICS Codes:

This NEA is not limited to any specific NAICS code.

Appendix I:

Further Information Regarding Contracts, Subawards, and Participant Support Costs

I. Background

The Standard Form 424A (SF-424A) includes a separate row for "Contractual" costs and "Other" costs. The "Other" cost category on the SF-424A should be used to cover both subawards and participant support costs. This appendix is intended to assist applicants with clarifying the differences between these cost categories.

II. Contracts

Under 2 CFR § 200.1, a *Contract* is defined as "a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a Federal award." As described in 2 CFR § 200.331, a contract is for the purpose of obtaining goods and services for the recipient's own use and creates a procurement relationship with the contractor. Characteristics indicative of a procurement relationship between the recipient and a contractor are when the contractor:

- Provides the goods and services within normal business operations.
- Provides similar goods or services to many different purchasers.
- Normally operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the federal program.
- Is not subject to compliance requirements of the federal program as a result of the agreement, though similar requirements may apply for other reasons.

Refer to <u>Appendix A of the EPA Subaward Policy</u> for detailed guidance on distinguishing between procurement contractors and subrecipients.

Grant recipients that enter into procurement contracts must comply with the applicable procurement provisions in 2 CFR § 200.317 through 200.327, 2 CFR Part 1500, and 40 CFR Part 33.

NOTE: Prior to naming a contractor (including consultants) or subrecipient in your application as a "partner," please carefully review Section IV.D. of <u>EPA's Solicitation</u> <u>Clauses</u> that are incorporated by reference in this announcement and discussed in relevant part here. Applicants must compete contracts for services and products, including consultant contracts, and conduct cost and price analyses, to the extent required by the procurement provisions of the regulations at 2 CFR Part 200. Applicants are not required to identify subrecipients and/or contractors (including consultants) in their grant application. However, if they do, the fact that an applicant selected for award has named a specific subrecipient, contractor, or consultant in the application EPA selects for funding does not relieve the applicant of its obligations to comply with subaward and/or competitive procurement requirements as described in Section IV.D. of <u>EPA's Solicitation Clauses</u>. <u>Please note that</u> applicants may not award sole source contracts to consulting, engineering, or other

firms assisting applicants with the application solely based on the firm's role in preparing the application or based on an assertion that the individual or firm has "unique qualifications."

EPA will not consider the qualifications, experience, and expertise of named subrecipients and/or named contractor(s) during the application evaluation process unless the applicant provides documentation that it has complied with these requirements.

For additional guidance, applicants should review EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements, EPA's Subaward Policy, and EPA's Subaward Policy Frequent Questions. EPA expects recipients of funding to comply with competitive procurement contracting requirements in 2 CFR Parts 200 and 1500 as well as EPA's rule on Participation by Disadvantaged Business Enterprises in EPA Programs in 40 CFR Part 33. The Agency does not accept justifications for sole source contracts for services or products available in the commercial marketplace such as consulting, data analysis, or project management.

III. Subawards

Under 2 CFR § 200.1, *Subrecipient* means an entity (usually but not limited to non-federal entities) that receives a subaward from a grantee to carry out part of a federal program but does not include program beneficiaries receiving participant support costs; see Section IV. off this Appendix below. Grant recipients may make subawards to subrecipients to carry out a portion of the grant project; in such case, the grant recipient is also known as a "pass-through entity." Subawards establish a financial assistance relationship under which the subrecipient's employees and contractors implement programs and projects to accomplish the goals and objectives of the grant. It is important to bear in mind that subrecipients are subject to the same federal requirements as the pass-through entity.

Under this competition, a non-federal entity is eligible to receive a subaward even if it is not eligible to receive a grant from the EPA directly. While there may be some situations in which a subaward to an individual may be appropriate, those situations are rare.

Subrecipients only receive reimbursement for their actual direct or approved indirect costs and do not "profit" from the transaction. For-profit entities participating in grant activities are typically contractors rather than subrecipients.

The EPA's Award Official or Grants Management Officer must approve subawards to forprofit entities and individuals on the basis of either a precise description of the subaward in the EPA approved budget and project narrative, or on a transaction-by-transaction basis.

The applicant's project narrative and budget narrative should include detailed descriptions of any proposed subawards and include cost estimates for subawards as line items under the "Other" budget category in the SF-424A; see Section 7 in Section IV.B. Should a recipient decide to make a subaward that was not described in the approved project narrative and

budget, the recipient must obtain prior written approval from the EPA's Award Official or Grants Management Officer for the subaward.

If a recipient chooses to pass funds from its grant to other entities through subawards, the recipient must comply with applicable subaward provisions of 2 CFR Part 200, the EPA's Subaward Policy, and the EPA's National Term and Condition for Subawards. Note that under 2 CFR §§ 200.331 through 200.333, there are extensive requirements for subrecipient monitoring and management that apply to pass-through entities.

Many of the federal administrative grant regulations in 2 CFR Part 200 and 2 CFR Part 1500, as well as the grant terms and conditions in the assistance agreement, "flow down" to subrecipients receiving a subaward. Such requirements need to be identified in the written subaward agreement between the recipient and the subrecipient. Additionally, if a subrecipient intends to procure goods or services using Reducing Indoor Air Risks grant funds, the subrecipient must comply with the applicable federal procurement standards in 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33 as these requirements also "flow down" to subrecipients.

There is no requirement for recipients to compete subawards under this NOFO; however, pass-through entities may choose to select subrecipients competitively provided this practice is consistent with applicable statutes, regulations, and the terms and conditions of their Reducing Indoor Air Risks grant.

Recipients may use the subaward template contained in <u>Appendix D of the EPA's Subaward Policy</u> to assist them in complying with the "subaward content" requirements; however, the EPA does not mandate the use of this template.

IV. Participant Support Costs

Recipients may provide participant support costs (PSCs) to program beneficiaries to enable beneficiaries to participate in the recipient's program or project. PSCs include rebates, subsidies, stipends, or other payments to program beneficiaries by a grantee, subrecipient, or contractor. For example, PSCs might be used for the purchase of eligible technologies. Program beneficiaries, rather than the grant recipient, would own the new technology.

PSCs differ from subawards in that the beneficiary is participating in the grant recipient's project or program instead of implementing their own project or program. Program beneficiaries may include but are not limited to, individual owner/operators, private or public fleet owners, or residents in the applicable area; however, program beneficiaries are not employees, contractors, or subrecipients of the grant recipient. The following is an example of a PSC: Sales of radon test kits.

Recipients may also use PSCs to make purchases on behalf of program beneficiaries. In some situations, this approach allows grant recipients to achieve economies of scale and/or take advantage of existing purchase contracts. Competitive procurement requirements apply to the grant recipient when the recipient takes this approach.

The federal administrative grant regulations in 2 CFR Part 200 and 2 CFR Part 1500, as well as the grant terms and conditions in the recipient's grant agreement, generally do not "flow down" to program beneficiaries receiving PSCs except that costs must be reasonable and incurred within the grant project period. Requirements for compliance with civil rights laws and ensuring that program beneficiaries are eligible to receive federal financial assistance are applicable as explained in <u>The EPA Guidance on Participant Support Costs</u>. In addition, program beneficiaries must abide by requirements to ensure that the funds are used only for authorized purposes.

If a grantee, subrecipient, or contractor is issuing PSCs, it must have a written agreement in place. The written agreement should not be structured as a subaward agreement and should not refer to program beneficiaries as subrecipients consistent with 2 CFR § 200.1, "Subrecipient." In addition, the written agreement should not include language requiring the program beneficiary to comply with the federal grant regulations at 2 CFR Part 200, 2 CFR Part 1500, or the terms and conditions found in the award between the EPA and the recipient, other than requiring that the costs must be reasonable, necessary, and allocable. The written agreement should also include the following:

- A description of the activities and amounts that will be supported by the PSCs.
- The program and/or statutory requirements that the program beneficiary must abide by in order to ensure that the funds are used only for authorized purposes.
- Specify which party will have title to the technologies (e.g., vehicles, engines, equipment and/or appliances), if any, purchased with PSCs.
- Source documentation requirements to ensure proper accounting of the PSCs.
- Any reporting that must be submitted by the program beneficiary.

The EPA's Award Official or Grants Management Officer must approve PSCs on the basis of either a precise description of the PSCs in the EPA approved budget and work plan, or on a transaction-by-transaction basis. The applicant's project narrative and budget narrative should include detailed descriptions of any proposed PSCs and include cost estimates for PSCs as line items under the "Other" budget category. Should a recipient decide to issue PSCs that were not described in the approved work plan and budget, the recipient must obtain prior written approval from the EPA's Award Official or Grants Management Officer. Moreover, after a grant is awarded, should a recipient decide to modify the amount approved (upwards or downwards) for PSCs, prior written approval from the EPA's Award Official or Grants Management Officer is also required.

When creating budgets, applicants/recipients must exclude PSCs from Modified Total Direct Costs for calculation of indirect costs as required by 2 CFR § 200.1, "Modified Total Direct Costs."

Resources:

RAIN-2018-G05-R1, "The EPA Guidance on Participant Support Costs."

Best Practice Guide for Procuring Services, Supplies, and Equipment Under the EPA Assistance Agreements.

<u>Grants Policy Issuance 16-01: EPA Subaward Policy for the EPA Assistance Agreement Recipients</u>, with attachments, includes:

- EPA Subaward Policy.
- Appendix A: Distinctions Between Subrecipients and Contractors.
- Appendix B: National Term and Condition for Subawards.
- Appendix C: Model Programmatic Subaward Reporting Requirement.
- Appendix D: Subaward Agreement Template.

EPA's Subaward Policy Frequent Questions.