

## **1. IDENTIFICATION OF INFORMATION COLLECTION**

### **1(a) Title of the Information Collection**

**Title:** Pollution Prevention Awards Program

**ICR Number:** EPA ICR No.: 2614.01; OMB Control No.: 2008-NEW

**Docket ID Number:** EPA-R08-OPPT-2020-0013

### **1(b) Short Characterization/Abstract**

The Environmental Protection Agency's (EPA) Pollution Prevention (P2) program is a voluntary program that encourages businesses/facilities to adopt P2 projects that reduce both financial costs (e.g. waste management and cleanup) and environmental costs (e.g. health problems and environmental damage). In passing the Pollution Prevention Act (PPA) in 1990, Congress found that "(T)here are significant opportunities for industry to reduce or prevent pollution at the source through cost-effective changes in production, operation, and raw materials use. Such changes offer industry substantial savings in reduced raw material, pollution control, and liability costs as well as help protect the environment and reduce risks to worker health and safety." 42 U.S.C. 13101(a)(2). EPA's P2 program is largely carried out through a competitive grant process and the provision of technical assistance to businesses. P2 is any practice that reduces environmental releases of hazardous substances, pollutants, or contaminants prior to entering a waste stream for recycling, treatment, or disposal. In other words, P2 is source reduction, the prevention of waste generation and environmental releases at the source. It is not treatment, minimization, or diversion of wastes. P2 conserves natural resources, including water and energy.

Furthermore, the PPA states the Administrator shall "establish an annual awards program to recognize a company or companies which operate outstanding or innovative source reduction programs" 42 U.S.C. 13103(b)(13). The EPA P2 Awards Program is an annual, voluntary, and non-monetary awards program that recognizes companies who demonstrate leadership in innovative P2 practices and encourage other entities to consider P2 approaches. This ICR is applicable to awards administered under the P2 Awards Program in EPA's Headquarters office and any of the 10 Regional Offices that choose to participate and implement a P2 Awards Program.

A business' decision to participate in the EPA P2 Awards Program is voluntary. Participation in the program begins with the completion and submittal of a no-cost application, which outlines a project(s) that has been implemented and meets the goals of the P2 program. Companies who want to be recognized for an award will need to complete an application describing their P2 efforts, activities, cost savings, pounds of hazardous chemicals reduced, energy conserved, or gallons of water saved, and the replicability of their approach. In addition, the application will

ask for specific information about their company, such as business size and location. Applications will be collected via an online submission webpage. Application questions will be a combination of drop-down options as well as narrative descriptions. All application submissions, scoring rubric, scoring, and decision memos will be archived and stored in accordance with all applicable records schedules. EPA P2 Coordinators will use this information in the overall evaluation, selection, and scoring process for selecting awardees.

There will not be a monetary cost for businesses to apply to the EPA P2 Awards Program. EPA anticipates it will take applicants less than 20 hours to complete, review, finalize, approve, and apply.

## **2. NEED FOR COLLECTION AND HOW INFORMATION WILL BE USED**

### **2(a) Need/Authority for the Collection**

Congress formally authorizes the P2 program in 42 U.S.C. §§13101-13109. This law may be cited as the “Pollution Prevention Act of 1990” and with abbreviated citation to “PPA” and the relevant section number.

The PPA states the Administrator shall “establish an annual award program to recognize a company or companies which operate outstanding or innovative source reduction programs” (PPA § 6604(b)(13)).

The 1993 Government Performance and Results Act (GPRA) (PL 103-62) requires federal agencies to develop plans for what they intend to accomplish, measure how well they are doing, make appropriate decisions based on the information they have gathered, and communicate information about their performance to Congress and to the public. In response, EPA develops a five-year Strategic Plan that is submitted to Congress. Awards made under this announcement will support EPA’s FY 2018-22 Strategic Plan (<http://www.epa.gov/planandbudget/strategicplan.html>), under Goal 1: Core Mission – A Cleaner, Healthier Environment, Objective 1.1 – Improve Air Quality; Objective 1.2 – Provide for Clean and Safe Water; Objective 1.3 – Revitalize Land and Prevent Contamination; Objective 1.4 – Ensure Safety of Chemicals in the Marketplace; and, Goal 2: More Effective Partnerships, Objective 2.1 Enhance Shared Accountability. The P2 program, which was established in 1990, is a key element of EPA’s strategic planning efforts.

As part of these strategic planning efforts, EPA encourages programs to develop meaningful performance measures, set ambitious targets, and link budget expenditures to results. Data collected under this ICR is required by EPA in order to meet its strategic goals and to establish an award program to recognize a company’s or companies’ P2 accomplishments. Participation in the awards program is voluntary.

### **2(b) Practical Utility/Users of the Data**

The information collected by the EPA P2 Awards Program is not designed or intended to support regulatory decision-making by other EPA offices. Companies will apply voluntarily. EPA will use information from the awards application to select and recognize businesses who have implemented outstanding P2 practices.

### 3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

#### **3(a) Non duplication**

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. EPA’s P2 program anticipates implementing the award program upon approval of this ICR application. Other, non-federal partner organizations promote P2 through awards and recognition programs, but these programs are for the most part state-based and not offered at the regional or national level. The National Pollution Prevention Roundtable (NPPR), a non-profit organization, hosts a national P2 awards program, but the categories differ from the businesses the EPA P2 Awards Program aims to recognize. Almost all information requested from respondents under this ICR is not available from other sources.

#### **3(b) Public Notice Required Prior to ICR submission to OMB**

Public comments were requested via the *Federal Register* on June 11, 2020 through August 10, 2020 during a 60-day comment period (85 FR 35652). One comment was received during this time expressing concerns about consumers buying new cars and the catalytic converters stop working after two years. They believe regulations should be in place to make cars with better catalytic converters. The comment is not relevant to this ICR or the Pollution Prevention Program, so no changes were made to this supporting statement or ICR package as a result.

#### **3(c) Consultations**

EPA P2 Coordinators asked current P2 grantees and technical assistance providers to provide input on the EPA P2 Awards application collection efforts. The consultants below were selected because they currently implement their own state recognition programs and/or have valuable insight as existing state technical assistance providers on how to minimize burden on businesses. The following partners provided input:

Name	Affiliation	Phone	Region
Jennifer Reutzel-Vaughan	Iowa Department of Natural Resources	515-281-8878	7
Dan Nickey	Iowa Waste Reduction Center	319-273-6588	7
Nancy Larson	Kansas State University	316-660-0104	7
Bruce Dvorak	University of Nebraska – Lincoln	402-472-3431	7
Rick Yoder	University of Nebraska – Omaha	402-554-6257	7
Lynette Myers	Colorado Department of Public Health and	303.692.3477	8

	Environment		
Jenny Grossenbacher	Montana State University	406-994-4292	8
Ben Jarvis	Idaho Department of Environmental Quality	208-869-2987	10
Lisa Cox	Oregon Department of Environmental Quality	503-229-5181	10

Each was asked to provide feedback on the amount of time needed to respond to the P2 Awards application and provided suggestions for improvements. Partners provided specific suggestions for improving the forms, including adjusting the application questions for clarity. Some long-time partners noted that completing the reporting forms would take less time over the years as applicants became more familiar with the data requested. EPA P2 Coordinators incorporated this feedback on the draft application.

### **3(d) Effects of Less Frequent Collection**

The P2 Awards application is a one-time information submittal for businesses/facilities that wish to be recognized by the annual EPA P2 Awards Program for P2 activities from the previous three years. Less frequent collection of this data is not feasible because it is an annual award program. Businesses may wish to submit applications in multiple years, which is voluntary.

### **3(e) General Guidelines**

All collection activities described within this ICR will adhere to OMB’s General Guidelines and regulations under 5 C.F.R. § 1320.5.

### **3(f) Confidentiality**

EPA will not require and does not expect that businesses will submit confidential information in the application. However, if the applicant asserts a business confidentiality claim for certain information provided in the application, EPA will manage that information in accordance with EPA confidentiality regulations at 40 C.F.R. 2.201 et seq. The P2 program will use confidential business information provided by businesses solely for purposes related to forming partnerships and will disclose the information only to EPA employees and EPA contractors cleared for confidential information with a specific need to know.

### **3(g) Sensitive Questions**

No questions of a sensitive nature concerning sexual behavior or attitudes, religious beliefs, or other matters usually considered private are asked in the EPA P2 Awards Program application.

## **4. RESPONDENTS AND INFORMATION REQUESTED**

### **4(a) Respondents/NAICS Codes**

Respondents are various types of businesses from all North American Industry Classification System (NAICS) codes that are located in a state in an EPA Region implementing this Awards Program. Applicant activity includes applying for an award, working with the respective EPA P2 Coordinator (if selected) to discuss awards presentation logistics, attending the awards presentation, and approving writeups, press releases, and presentations. If the applicant chooses, a representative can present on a webinar to inform other businesses of the benefits of implementing P2 projects and practices.

#### **4(b) Information Requested**

##### **(i) Data items, including record keeping requirements**

Each award applicant will answer the following short answer questions. Each question has a 500-word limit and weighted value. The weights will be an important factor when scoring and ranking the applications. Each participating EPA Region will score their own applications and select winners. Therefore, only applicants within the same EPA Region are competing against each other, not against those from other Regions.

- 1) Description of business or organization (what does your business do and/or make?)
- 2) Describe your business or organization's commitment and leadership in P2, both internally within the organization and externally (e.g. with suppliers, customers, and the community). Include applicable policies, employee engagement, and community engagement. As a reminder, P2 does not refer to forms of disposal such as recycling, composting, waste-to-energy, etc. (25 percent)
- 3) Describe the P2 methods or activities your business or organization implemented between [YEARS xxxx-xxxx]. Please address: A) how the initiative was generated B) the significant or unique aspects of your P2 activities C) what company or facility needs were addressed D) what unintended benefits were realized (25 percent)
- 4) Describe how your P2 activities support your business or organization's goals. Provide context for the P2 activities. We are looking for a "big picture" description. (10 percent)
- 5) Describe the measurable results from your P2 activities. Please include any cost savings, pounds of hazardous chemicals reduced, kilowatt hours of energy conserved, or gallons of water saved, if applicable. Please normalize results to show savings for similar production amounts, if applicable (e.g. installation of conductivity meters saved 600,000 gallons of water in 2017, based on the same production as in 2016). (25 percent)
- 6) Describe how implementing P2 activities has benefited your business and the surrounding community. Describe how your business serves as a model for entities with similar processes or environmental challenges. (10 percent)

7) Describe your business or organization’s specific, measurable P2 goals for the coming year (5 percent)

Additional contact information questions will be asked such as company name, contact title, email address, etc. The following general questions will also be asked:

1. Size of business or organization
2. Is your business or organization willing to be featured in publicly available newsletters, case studies, or webinars?
3. Is someone within your business or organization willing to present (about 15 minutes) on a webinar to other businesses considering P2 strategies?
4. Would you like to include any relevant photos, news articles, or other supplementary materials?

These general questions do not have any weight to them and therefore will not be considered in application scores. The purpose of the general questions is to provide context and understand how the potential awardee would participate in outreach.

## **(ii) Respondent Activities**

This is a voluntary, non-monetary awards program. Applicant activities include reviewing program instructions and eligibility requirements, gaining approval from management to apply, collecting relevant information, completing the application and supplementary materials, and submitting the application. Applicants have the information and data readily available to answer the listed short answer questions. The amount of time and effort expended to apply depends on the specific circumstances of the business/facility. EPA does not expect that applicants will expend significant time or resources reviewing instructions, collecting information and completing the application. Furthermore, the time, effort and resources necessary to respond to several questions in the application will be incurred by persons in the normal course of their activities, which is excluded from the “burden” calculation under the Paperwork Reduction Act, see 5 C.F.R. section 1320.3(b)(2).

## **5. INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

EPA will engage in the following activities related to the **awards application**:

- Update the application to be submitted by companies, post Awards Program information to the P2 website and/or Regional P2 website and communicate the solicitation period and requirements for applying to internal and external parties.
- Create and maintain a tracking system to record each participant's application.
- Respond to questions pertaining to the application.
- Review all submissions and select awardees.
- Purchase awards and present them to those selected. Each Region will have flexibility on when and where to present awards.
- Develop awardee summaries for P2 websites.

### **5(b) Collection Methodology and Management**

In collecting and analyzing the information associated with this ICR, EPA will use electronic form software, telephones, and computers, including Microsoft Office products. Each application will be saved electronically in a Regionally designated tracking system to assure all applications are accounted for. All applications received by an EPA Region will be used in the Awards Program review process. EPA will ensure the reasonableness and completeness of collected information by reviewing each submittal.

EPA will offer all information collection instruments electronically with hard-copy versions available upon request. Electronic submissions do not have a significant impact on respondent or Agency burden. The additional burden of hard-copy submissions is minimal for the risk reduction.

To conserve resources, EPA will encourage and promote the use of electronic submissions via EPA's P2 website; however, hard copy submissions will be permitted upon request. The website will automatically email the applications to the respective Regional P2 Coordinator. Existing Regional Awards Programs have demonstrated the success of this website submission system.

### **5(c) Small Entity Flexibility**

All data collected under this ICR is voluntarily reported. EPA expects that some of the companies will be small entities. EPA has designed its reporting materials to minimize respondent burden while obtaining sufficient and accurate information. EPA considered the less burdensome collection mechanism of evaluating case studies within EPA's P2 case study database, but this collection mechanism was not adopted for the following reasons: (1) EPA's database of case studies is not inclusive of all P2 projects carried out over the last 3 years that would be eligible for P2 Awards and (2) EPA's database of case studies largely only capture activities supported by the EPA Pollution Prevention and Source Reduction Assistance grant programs. Applicants to the P2 Awards Program are not required to have been supported by EPA's grant programs.

### **5(d) Collection Schedule**

Businesses or organizations may voluntarily submit an application during the solicitation period. The solicitation period will be done on an annual basis and is open for approximately 2 months, once posted. The timing of open solicitation is dependent upon regional discretion but cannot be less than 40 business days.

## **6. ESTIMATING COLLECTION BURDEN AND COST**

### **6(a) Estimating Respondent Burden**

EPA used input from existing P2 grantees and technical assistance providers to estimate the burden for respondents. Table 1 presents the annual burden hours and costs per respondent as well as the total burden hours and costs per Region during each of the three years covered under this ICR.

### **6(b) Estimating Respondent Costs**

EPA estimates receiving a total of 150 applications over the 3year ICR period. 10 applications in 5 different regions. Table 1 shows the aggregate annual respondent burden and costs for the information collection activities associated with the EPA P2 Awards Program.

#### **(i) Estimating Respondent Labor Costs**

The labor rates used to determine the estimated costs to respondents are consistent with the hourly wage rates published by the Bureau of Labor Statistics on employment and earnings. Rates include the cost of overhead and fringe benefits. EPA estimates an average respondent's hourly labor rate (e.g. hourly plus overhead) of \$115.54 for managerial staff, \$86.98 for technical staff, and \$45.22 for clerical staff.

#### **(ii) Estimating Respondent Capital and Operations and Maintenance Costs**

Businesses who choose to participate in the awards program will be requested to submit materials electronically and retain materials in electronic format to conserve paper. For this reason, EPA does not estimate costs for copying and mailing. We estimate 5 regions will implement an award program during the 3-year ICR period and will calculate total amounts for the 5 regions.



Table 1. Respondent Burden and Costs

Information Collection Activity	Burden Hours and Costs per Respondent							Total Hours and Costs per Region		
	Managerial	Technical	Clerical	Hours per Year	Costs per Year	Annual Capital Startup Costs	Annual O&M Costs	# Resp. per Year	Total Hours per Year	Total Costs per Year
Hourly Rate	\$115.54	\$86.98	\$45.22							
Award Application										
Review instructions & eligibility requirements & gain approval from management	1	1		2	\$202.52			10	20	\$2,025.20
Gather information	2	10		12	\$1,100.88			10	120	\$11,008.80
Complete application & option. supp. material	2	1	1	4	\$363.28			10	40	\$3,632.80
Submit the application	1		0.5	1.5	\$138.15			10	15	\$1,381.50
Total	6	12	1.5	19.5	\$1,804.83			10	195	\$18,048.30
<b>Total Burden for 5 Regions</b>	<b>30</b>	<b>60</b>	<b>7.5</b>	<b>97.5</b>	<b>\$9,024.15</b>			<b>50</b>	<b>975</b>	<b>\$90,241.50</b>
<b>Total Burden over 3 year period</b>	<b>90</b>	<b>180</b>	<b>22.5</b>	<b>292.5</b>	<b>\$27,072.45</b>			<b>80</b>	<b>2,925</b>	<b>\$270,724.5</b>

**6(c) Estimating Agency Burden and Costs**

EPA P2 Coordinators drew on experience implementing other voluntary programs to estimate Agency staff burden estimates. Table 2 presents the annual burden hours and costs per respondent application as well as the total burden hours and costs per EPA Region during each of the three years covered under this ICR.

Table 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with the EPA P2 Awards Program. The annual hourly burden for the Agency is approximately 130 hours at a cost of \$11,912 per EPA Region. The three-year, bottom-line Agency burden for the life of this ICR is approximately 390 hours at a cost of \$35,736 per EPA Region.

**(i) Estimating Agency Labor Costs**

The hourly labor rates used to determine the estimated costs to the Agency are based on the 2020 GS pay schedule for Washington D.C. locality pay available from the Office of Personnel Management. EPA estimates an average hourly labor cost of \$123.89 for managerial staff and \$83.95 for professional staff. The labor costs are based on the following GS levels and steps: GS Level 15 Step 5 for managerial rate and GS Level 13 Step 3 for professional rate. EPA multiplied hourly rates by the standard government overhead factor of 1.6.

Table 2. Agency Burden and Costs

Information Collection Activity	Burden Hours and Costs per Application					Total Hours and Costs per Region			
	Managerial	Professional	Hours per Year	Costs per Year	Annual Capital Startup Costs	Annual O&M Costs	# Activities per Year	Total Hours per Year	Total Costs per Year
Hourly Rate	\$123.89	\$83.95							
Award Application									
Update application materials, post to website, & communicate application requirements	5	40	45	\$3,977.45			1	45	\$3,977.45
Maintain application tracking system		1	1	\$83.95			10	10	\$839.50
Respond to questions pertaining to application		0.5	0.5	\$41.98			10	5	\$419.75
Review application	2	5	7	\$667.53			10	70	\$6,675.30
Total	7	46.5	53.5	\$4,770.91			31	130	\$11,912.00
<b>Total Amount for 5 regions</b>	<b>35</b>	<b>232.5</b>	<b>267.5</b>	<b>\$23,854.55</b>				<b>650</b>	<b>\$59,560</b>
<b>Total Burden over 3 year period</b>	<b>105</b>	<b>697.5</b>	<b>802.5</b>	<b>\$71,563.65</b>				<b>1,950</b>	<b>\$178,680</b>

**6(d) Estimating the Respondent Universe and Total Burden and Costs**

See Table 1 for burden calculations.

**6(e) Bottom-Line Burden Hours and Cost Tables**

The three-year, bottom-line respondent burden for the life of this ICR is outlined below.

TOTAL NO. OF RESPONDENTS: 150  
 TOTAL NO. OF RESPONSES: 150  
 TOTAL BURDEN HOURS: 2,925  
 TOTAL COST TO RESPONDENTS: \$270,724.5

**6(f) Reasons for Change in Burden**

N/A. This is a new ICR.

**6(g) Burden Statement**

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with

any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-R08-OPPT-2020-0013 online using [www.regulations.gov](http://www.regulations.gov) (our preferred method), by email to [payan.melissa@epa.gov](mailto:payan.melissa@epa.gov) or by mail to: EPA R8, 1595 Wynkoop St. Mail Code 8LCRD-CSES, Denver, CO 80202, which is available for online viewing at [www.regulations.gov](http://www.regulations.gov), or in person viewing at the P2 Regional Award Program in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the P2 Regional Award Program is (303) 312-6157. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-R08-OPPT-2020-0013 and OMB Control Number 2008-NEW in any correspondence.