

# Supporting Statement for an Information Collection Request (ICR) Under the Paperwork Reduction Act (PRA)

## EXECUTIVE SUMMARY

### Identification of the Information Collection – Title and Numbers

**Title:** P2 Grantee Required Data Collection in Standard Electronic Format

**EPA ICR No.:** 2728.01

**OMB Control No.:** 2070-NEW

**Docket ID No.:** EPA-HQ-OPPT-2022-0773

### Abstract

This is a request for a new Information Collection Request (ICR). This ICR describes the burden of activities for the collection of activity and results data related to pollution prevention grant programs via a standard electronic format.

Pollution prevention (P2) means reducing or eliminating pollutants from entering any waste stream or otherwise being released into the environment prior to recycling, treatment, or disposal. EPA's P2 program operates five grant programs. The three long-standing grant programs are supported by P2 programmatic funding. The two newest grant programs are supported by the 2021 Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law (BIL), funding and do not require grantee matching funds as the existing grants do.

Long-standing pollution prevention grants:

- **Pollution Prevention State Tribal Assistance Grants (P2 STAG):** Funds projects that provide technical assistance (e.g., information, training, tools) to businesses to help them develop and adopt source reduction practices (also known as P2).
- **Bipartisan Infrastructure Law Pollution Prevention Grant (P2 BIL):** Funds projects that provide technical assistance (e.g., information, training, tools) to businesses to help them develop and adopt source reduction practices (also known as P2).
- **Source Reduction Assistance (SRA) Grant:** Supports research, investigation, experiments, surveys, study, demonstration, education, and training using P2 approaches.

New IIJA supported pollution prevention grants:

- **Pollution Prevention Grant: Environmental Justice Through Safer/Sustainable Products (P2 EJ Products):** This new grant program

supports efforts to increase both the supply and demand for greener products and improve the health of underserved/disadvantaged communities.

- **Pollution Prevention Grant: Environmental Justice in Communities (P2 EJ Facilities):** This new grant program funds efforts to reduce harmful impacts of pollution in underserved/disadvantaged communities.

EPA’s goal in developing a standard electronic format is to provide a consistent manner of data collection from grant-funded projects so that ultimately the information collected can be inputted into a database (under development) which will be searchable and sharable. EPA has developed four templates in MS Excel format. The templates are designed for two types of P2 and SRA projects and two types of IIJA projects. For the P2 and SRA projects, there is one template for projects providing technical assistance to businesses and industry and one for projects supporting recognition programs, leadership programs, outreach, tool development, research projects and/or demonstration projects. For the IIJA projects, there is one template for projects supporting efforts to increase the supply and demand for greener products and one for project supporting efforts to reduce harmful impacts of pollution in underserved/disadvantaged communities. The completed templates will be collected annually by Regional grant administrators (for P2 and SRA grants) and by EPA Headquarters grant administrators (for IIJA grants), who will be responsible for reviewing the data prior to database upload. When the database is complete, grantees will be required to submit their data there directly rather than the templates.

This ICR augments the ICR entitled “EPA’s General Regulation for Assistance Programs ICR” (OMB Control No. 2030-0020; EPA ICR No. 0938.18), which accounts for the burden associated with the minimum management requirements for all recipients of EPA grants or cooperative agreements. This new ICR provides the burden estimate for activities associated with grantee use of a standardized electronic format and EPA review of the submissions; and seeks approval for four standard reporting templates. The table below shows the burden for the four templates, and the burden is assumed to be similar for the two newest templates (as shown in Tables 4 and 5 in the supporting statement).

### Summary Total Burden and Costs

Information Collection	Total Number of Respondents	Total Number of Responses	Annual Burden (hours)	Total Cost (\$)
Template #1*	119	119	2305	\$192,329
Template #2	36	36	494	\$45,430
<b>Products Template*</b>	60	0	1162	\$97,010
<b>Communities Template*</b>	60	0	1162	\$97,010
<b>Respondent</b>	275	275	5,124	\$431,779

<b>Total</b>				
<b>Agency Total</b>	NA	NA	-275	\$10,363-

\*The two newest templates for IIJA grant reporting are assumed to be a similar burden to grantees as Template #1 used for the long-standing P2 grants.

## SUPPORTING STATEMENT

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

EPA funds states and tribal entities (in the form of grants or cooperative agreements) to promote source reduction to businesses under the authority of Section 6605 of the Pollution Prevention (P2) Act of 1990, public law 101-508, 42 USC 13104, 40 CFR 35.340 et. seq. and 35.660 et. seq. (**Attachment 1**) In addition to this recurring authorization, the Infrastructure Investment and Jobs Act (IIJA), enacted in November 2021 authorized an additional \$100 million in funding for expansion of P2 grants. The purpose of the grants is to encourage businesses to adopt environmental strategies and solutions that significantly reduce or eliminate waste at the source and result in cost savings. In addition to funding P2 grants with no match requirement, the IIJA is also funding two new grant programs in the 2023 grant cycle focusing on P2 in underserved/disadvantaged communities and source reduction via environmentally preferable purchasing and the Safer Choice program.

In addition to the P2 grants, EPA also funds organizations (states, local, interstate, and intrastate government agencies and instrumentalities, federally recognized tribes, inter-tribal consortia, and non-profit organizations) under the Source Reduction Assistance (SRA) grants to promote practical source reduction practices, tools, and training on P2 approaches to measurably improve human and environmental health by reducing the use of hazardous substances, reducing toxic pollutants, reducing resource use (e.g., water and energy), and reducing expenditures and liability costs to businesses, non-profit organizations and/or communities. EPA’s statutory authorities for SRA grants include: Clean Air Act, Section 103(b)(3), as amended; Clean Water Act, Section 104(b)(3), as amended; Federal Insecticide, Fungicide, and Rodenticide Act, Section 20, as amended; Safe Drinking Water Act, Section 1442 (a)(1) and (c), as amended; Solid Waste Disposal Act, Section 8001(a), as amended; and Toxic Substances Control Act, Section 10, as amended.

Information collected under this effort will allow EPA to measure results achieved from the grants, which is required both by the P2 Act and EPA order:

- The P2 Act §13104(d) requires EPA to “establish appropriate means for measuring the effectiveness of the State grants.”
- Pursuant to Section 6a of EPA Order 5700.7a1, “Environmental Results under EPA Assistance Agreements,” EPA requires that recipients of EPA P2 funding

report the environmental outputs (e.g., activities, products) and outcomes (results achieved from the outputs, e.g., reduction in pounds of hazardous material used and of hazardous substances, pollutants and contaminants released, reductions in gallons of water used).

To date, EPA has collected the needed data under a separate ICR entitled “General Administration Requirements for Assistance Programs (Renewal)” (OMB Control No. 2030-0020, EPA ICR No. 0938.21). Under this ICR, EPA is seeking approval to require grantees to submit data in a specified format to improve consistency of data collected among grantees and improve EPA’s ability to make data available to other grantees and other interested parties (e.g., businesses, academics, students).

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the Agency has made of the information received from the current collection.**

EPA collects output and outcome data from P2 grantees for several reasons:

- To comply with the requirements of the P2 Act
- To comply with EPA Order 5700.7A1 which requires reporting on how funding distributed advances the Agency’s mission of protecting human health and the environment.
- To demonstrate the success and value of EPA’s P2 program.
- To document progress meeting quantitative performance goals identified in 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
- To improve program design, implementation of future programs.
- To help grantees demonstrate the power of P2 to potential clients.

These data also are the cornerstone of the P2 grant program’s strategic approach: sharing information and lessons learned so others can replicate success. By documenting and sharing the lessons learned from the technical assistance grantees provide businesses through the grants, technical assistance provided at one facility creates lessons learned that can benefit many other facilities. By helping one facility and documenting results, EPA has the potential to help many by amplifying the results.

To date, EPA has used data collected in the following ways:

- Maintained a record of all reported results for compliance purposes.
- Entered results into EPA’s Annual Commitment System (ACS) for purposes of monitoring results against EPA’s strategic goals.
- Posted [overall results](#) on the P2 website to demonstrate success and the value of the program.
- Completed OMB’s Program Assessment Rating Tool (PART) to assess effectiveness of the program.
- Informed development of the new IIJA grant program.

- Published success stories and other materials describing results of individual efforts to enable information sharing and promotion of P2 practices among grantees and industry.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

To date, EPA has collected grantee reporting data under a separate ICR that allows grantees to report the required information in any format they chose. The program has created a set of optional Excel templates for grantees who wish to use them. Under this ICR, EPA is proposing to collect grantee data in a standard format (based on the Excel templates) and require grantees to submit the data electronically upon completion of the new database. This standard template differs from what most grantees have used in the past and could create additional burden on their staff to complete.

Upon approval of this ICR, use of the templates will become mandatory. EPA is in the process of developing a database that will house data from each P2 grantee. Once the basic structure of the database is complete, EPA will create a module that allows grantees to submit the data electronically. Once in place, it is anticipated that electronic reporting will reduce the burden on grantees to report the needed information and on the Agency to review the information.

All P2 grantees will have access to the database to learn from other grantees about facilities they have worked with and what output and outcomes have been achieved through other P2 projects.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

Each grantee will only submit one standard template for each of their types of projects. EPA grant administrators (Regional or Headquarters staff) will review the data to ensure consistency and avoid duplication. Much of the information is already being collected by P2 grantees; however, in varying formats. The use of the standard templates will ensure consistency and a form of the data that can be uploaded into the searchable P2 grants database.

**5. If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.**

Businesses are not eligible for the grants, so no small businesses will be asked to complete a reporting form. To date, most grantees have been state agencies and instrumentalities of states (e.g., state universities). Some of the grantees are small entities, including some tribes and nonprofits (funded under SRA grants). EPA allows all

grantees to use funding from the grants to complete the reporting forms, which helps minimize the burden on them. The data collection process takes place under the P2 grants regardless of the format that the data is provided to the EPA.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The period of performance for most grants is two years; however, some grants are issued for 2.5 years or three years and any grant may be extended at no additional cost to the government upon approval by the EPA Project Officer. EPA requires grantees to report environmental outcome data on an annual basis for several reasons. First, annual reporting allows EPA to determine whether the grantee is making sufficient progress towards their goals and identify any mid-grant corrections needed while there is still funding available under the grant. Second, EPA includes the data as part of its annual commitments to EPA management.

EPA has considered requiring the outcome reporting only upon completion of the grants, but that would not allow for any mid-grant corrections of efforts. In addition, if reported only at the end of the grant, EPA would not be able to include the data in its annual reporting. Receiving the data only at the end of the grant would also delay EPA amplification of innovative practices to other grantees and businesses.

**7. Explain any special circumstances that require the collection to be conducted in a manner:**

- a) requiring respondents to report information to the agency more often than quarterly;
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c) requiring respondents to submit more than an original and two copies of any document;
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which

**unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

- h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

None of the above items are applicable to this ICR.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside EPA to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Pursuant to 5 CFR 1320.8(d), EPA published a notice in the **Federal Register** on February 15, 2023, (88 FR 9879; FRL-10208-01-OCSP), announcing the information collection activity, soliciting public comment on specific aspects of the ICR and providing a 60-day public comment period.

The EPA also consulted 9 stakeholders via phone calls and specifically asked them for their assessment of the regulatory burden estimates expressed by the Agency in this ICR, which are summarized in the consultation document (**Attachment 2**). The stakeholders consulted were:

- 1) Virginia Department of Environmental Quality
- 2) Kansas State University
- 3) MT State University
- 4) MN Technical Assistance Program
- 5) NH Department of Environmental Services
- 6) OR Department of Environmental Quality
- 7) West Virginia University
- 8) WA Department of Ecology
- 9) CO Department of Public Health and Environment

The Agency received comments from two state agencies and the National Pollution Prevention Roundtable (NPPR). A summary of the comments received from these entities and Agency responses are in a Response to Comment document (**Attachment 3**).

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not applicable.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

The information collected will be stored on an EPA secured local area network, then also inputted to the web-based P2 grants database. EPA asks grantees to refrain from including any confidential business information (CBI) in their reporting. Any personal information included in a request would be treated in accordance with the Privacy Act, section 14 of TSCA, and the Freedom of Information Act.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No information of a sensitive or private nature is requested in conjunction with these information collection activities, and these information collection activities comply with the provisions of the Privacy Act of 1974 and OMB Circular A-108.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- a) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- b) If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**

- c) **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.**

EPA based its burden estimates on interviews with nine current EPA Pollution Prevention grantees who have either already or anticipate completing the Template #1 and/or Template #2 for P2 grant reporting. It has been assumed that the burden of reporting using the two new templates developed for the IIJA grants will be the same as the burden of completing Template #1.

The grantees were asked the following questions:

- 1) How long would it take you and your staff to enter information on the **P2 grant project tab** in the spreadsheets each time you use them? Please include the amount of time it takes to read the instructions and locate any applicable files or information.
  - a. Would you enter the information yourself or would someone assist you?
- 2) How long would it take you and your staff to enter the **Facility Information** on each *facility tab* in the spreadsheets each time you use them? Please include the amount of time it takes to read the instructions and locate any applicable files or information.
  - a. Would you enter the information yourself or would someone assist you?
- 3) This question relates to Template 1: Facility-Level Reporting for Direct P2 Technical Assistance to Individual Facilities. On average, how long would it take you and your staff to enter **Recommended P2 Actions** on each *facility tab* in the spreadsheet each time you use it? Please include the amount of time it takes to read the instructions and locate any applicable files or information.
  - a. Would you enter the information yourself or would someone assist you?
  - b. Regarding existing grants, on average, for how many facilities do you provide information on *Recommended P2 Actions* on the individual facility tabs each time you report?
- 4) This question relates to Template 2: Facility-Level Reporting for Green Certification, Leadership Programs or P2 Technical Assistance for Multiple Facilities. On average, how long would it take you and your staff to enter **P2 Actions Implemented** on each *facility tab* in the spreadsheet each time you use it? Please include the amount of time it takes to read the instructions and locate any applicable files or information.
  - a. Would you enter the information yourself or would someone assist you?
  - b. Regarding existing grants, on average, for how many facilities do you provide information on *P2 Actions Implemented* on the individual facility tabs each time you report?

Grantee responses averaged about 20 hours to complete Template #1 for all facilities and 14 hours to complete Template #2 for all facilities. Two hours were added to the

time to complete Template #2 to include reporting on output measures related to amplification activities, tool development, and research and demonstration projects.

In order to estimate total respondent burden and cost associated with this ICR, Bureau of Labor Statistics (BLS) data on wages and fringe benefits (total compensation) are used. Specifically, wages are estimated for labor types (management, technical, and clerical) within NAICS 999200 – State Government. The Agency uses average wage data for the relevant sectors available in the National Industry-Specific Occupational Employment and Wage Estimates from the Bureau of Labor Statistics (BLS). (See [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)). Wages are then adjusted to include benefits and overhead. Table 2 presents the fully loaded wage rates used in this ICR.

**Table 1: Derivation of Respondent Fully Loaded Wage Rates**

<b>State Government (NAICS 999200)</b>			
<b>Item</b>	<b>Labor Category<sup>1</sup> (2021\$)</b>		
	<b>Managerial</b>	<b>Technical</b>	<b>Clerical</b>
Unloaded Hourly Rate <sup>2</sup>	\$47.69	\$32.49	\$21.79
Benefits Percentage <sup>3</sup>	61%	61%	61%
Benefits Per Hour	\$29.20	\$19.89	\$13.34
Loaded Hourly Rate	\$76.89	\$52.38	\$35.13
Overhead Percentage <sup>4</sup>	50%	50%	50%
Overhead Per Hour	\$38.44	\$26.19	\$17.56
<b>Fully Loaded Hourly Rate</b>	<b>\$115.33</b>	<b>\$78.57</b>	<b>\$52.69</b>

<sup>1</sup> Standard Occupational Codes:  
 Management: 11-0000, Management Occupations  
 Technical: 19-0000, Life Physical, and Social Science Occupations  
 Administrative: 43-0000, Office, Clerical and Administrative Support Occupations  
<sup>2</sup> Bureau of Labor Statistics, NAICS 999200 – State Government, May 2022, [http://www.bls.gov/oes/current/naics4\\_999200.htm](http://www.bls.gov/oes/current/naics4_999200.htm)  
<sup>3</sup> Benefits as a percent of unloaded hourly wage. Benefits calculated using: <https://www.bls.gov/news.release/ecec.t01.htm#>, Table 1. Employer Costs for Employee Compensation by ownership (data on state and local government workers).  
<sup>4</sup> U.S. Environmental Protection Agency, EPA Air Pollution Control Cost Manual, Sixth Edition, EPA-452-02-001, January 2002, pp. 2-34. The loading for indirect costs is within the range of 20-70% of the loaded labor rate (wage + benefits) suggested in EPA guidance.

Nine past grant recipients were interviewed about the potential burden of using the data collection templates. The information on minutes projected to be spent on the task are summarized in Table 2 below. Please visit **Attachment 2** to see complete breakdown of minutes for each respondent and modifications made to adjust for grantees with very large programs and existing data tracking systems. The data shown here represents a

worst-case scenario for the grantees. It is assumed that in subsequent reporting years the time burden will drop due to increased familiarity with the system as well as the development of export/import processes to assist grantees with transmitting their data from existing tracking systems into the preferred EPA reporting template and database.

**Table 2: Labor Time Estimates**

<b>Template #1</b>			
	<b>Management Minutes</b>	<b>Senior Technical Staff Minutes</b>	<b>Junior Staff Minutes</b>
<b>Question 1 Breakdown of Labor – P2 Grant Project Tab</b>			
Average:	2.75	24.375	0.25
<b>Question 2 Breakdown of Labor – Facility Information</b>			
Average:	56.25	137.50	118.75
<b>Question 3 Breakdown of Labor – Recommended P2 Actions</b>			
Average:	311.25	323.125	188.125
<b>Template #2</b>			
<b>Question 1 Breakdown of Labor – P2 Grant Project Tab</b>			
Average	13.33	1.67	0.00
<b>Question 2 Breakdown of Labor – Facility Information</b>			
Average	46.67	163.33	0.00
<b>Question 4 Breakdown of Labor –Actions Implemented</b>			
Average	240.00	238.33	0.00

Table 3 presents the estimated unit respondent burden hours and costs associated with the information collection activities under this ICR.

**Table 3: Estimated Unit Burden and Cost to Respondents**

<b>Activity/Form</b>	<b>Hours</b>				<b>Costs (2021\$)</b>			
	<b>Management</b>	<b>Technical</b>	<b>Junior</b>	<b>Total</b>	<b>Management</b>	<b>Technical</b>	<b>Junior</b>	<b>Total</b>
<b>Template #1</b>								
P2 Grant Project Tab	0.05	0.41	0.00	0.46	\$5.29	\$31.92	\$0.22	\$37.42
Facility Information	0.94	2.29	1.98	5.21	\$108.12	\$180.06	\$104.29	\$392.47
Recommended P2 Actions	5.19	5.39	3.14	13.71	\$598.27	\$423.14	\$165.22	\$1,186.63
<b>Total</b>	<b>6.17</b>	<b>8.08</b>	<b>5.12</b>	<b>19.37</b>	<b>\$711.68</b>	<b>\$635.11</b>	<b>\$269.73</b>	<b>\$1,616.52</b>
<b>Template #2</b>								
P2 Grant Project Tab	0.22	0.03	0.00	0.25	\$25.63	\$2.18	\$0.00	\$27.81
Facility Information	0.78	2.72	0.00	3.50	\$89.70	\$213.89	\$0.00	\$303.59
Actions Implemented	4.00	3.97	0.00	7.97	\$461.32	\$312.10	\$0.00	\$773.42
Output Measures	0.00	1.00	0.00	1.00	\$0.00	\$78.57	\$0.00	\$78.57
Data Collection for Amplification	0.00	1.00	0.00	1.00	\$0.00	\$78.57	\$0.00	\$78.57
<b>Total</b>	<b>5.00</b>	<b>8.72</b>	<b>0.00</b>	<b>13.72</b>	<b>\$576.64</b>	<b>\$685.31</b>	<b>\$0.00</b>	<b>\$1,261.96</b>
Note that burden estimates for Facility Information, Recommended P2 Actions, and Actions Implemented reflect the time to report on all facilities covered by the Grant for the Grantees interviewed.								

Unit burden and costs are then combined with the number of respondents to estimate the total burden and cost in Table 4.

**Table 4: Estimated Total Burden and Cost to Respondents**

Respondent Type <sup>1</sup>	Estimated Number of Respondents Using Template #1 each Year <sup>1,2</sup>	Estimated Number of Respondents Using EJ Products Templates Each Year	Estimated Number of Respondents Using EJ Communities Templates Each Year	Estimated Number of Respondents Using Template #2 each Year <sup>1,2</sup>	Unit Burden and Cost				Total Burden Over ICR Period (Hours)	Total Cost Over ICR Period (\$2021)	Annual Burden (Hours) <sup>3</sup>	Annual Cost (\$2021) <sup>3</sup>
					Template #1		Template #2					
					Hours	Cost (2021\$)	Hours	Cost (2021\$)				
P2 Grants	55			20	19.37	\$1,616.52	13.72	\$1,261.96	4,020	\$342,443	1,340	\$114,148
SRA Grants	20			0	19.37	\$1,616.52	13.72	\$1,261.96	1,162	\$96,991	387	\$32,330
I/JA/P2 Grants	44			16	19.37	\$1,616.52	13.72	\$1,261.96	3,216	\$273,955	1,072	\$91,318
Products Grants <sup>4</sup>		60		0	19.37	\$1,616.52	13.72	\$1,261.96	3,487	\$290,974	1,162	\$96,991
Communities Grants <sup>4</sup>			60	0	19.37	\$1,616.52	13.72	\$1,261.96	3,487	\$290,974	1,162	\$96,991
<b>Total</b>	<b>119</b>	<b>60</b>	<b>60</b>	<b>36</b>					<b>15,372</b>	<b>\$1,295,337</b>	<b>5,123</b>	<b>\$431,779</b>

<sup>1</sup> There may be overlap between respondents administering different grants as well as overlap in using the templates, however, this overlap is not ascertainable at this time and for the purposes of this analysis, all grantees are considered unique.

<sup>2</sup> Respondent (Grantee) counts were developed with best professional judgement based on past grant award history.

<sup>3</sup> Annual Burden and Cost are calculated by dividing the Total Burden/Cost over the three year ICR period by three to account for the fact that data collection activities may occur in each of the three years.

<sup>4</sup> The Products and Communities templates for the I/JA grant reporting are newly developed and have not yet been used by grantees. It has been assumed here that the burden of completing these templates will be similar to completing Template #1.

- 13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).**
- a) The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
  - b) If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
  - c) Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no operational or maintenance costs associated with this ICR.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

EPA will review the data submitted in Template #1 and #2, as well as the new Communities and Products data collection templates. Referring to the EPA's General Regulation for Assistance Programs ICR, a baseline burden of a total of 5 hours was established (based on report review tasks). Given that the templates will streamline the

process to review the submitted information, It was determined that the review will take 1 hour per submission. Table 5 presents the estimated Agency annual burden hours and costs associated with the information collection activities under this ICR. Agency wage rate data used to calculate labor costs were gathered from the U.S. Office of Personnel Management Salary Table 2021-DCB, for a GS-7, step 1, employee in the Washington, D.C. area. A loading factor of 1.6 was applied to the base rate to arrive at the 2021 loaded wage rate of \$37.68/hour. A total burden over the three year period was calculated to be \$31,086 with an annual cost of \$10,363.

**Table 5: Estimated Burden and Cost to the Agency**

Collection Activity	Reporting Burden per Template (Hours) <sup>1</sup>	Total EPA Burden Over the Three Year ICR Period (Hours)	Total EPA Costs Over the Three Year ICR Period (\$2021)	Annual EPA Burden (Hours)	Annual EPA Costs (\$2021)
<b>P2 Grants</b>					
Review of Template #1 information	1	165	\$6,217	55	\$2,072
Review of Template #2 information	1	60	\$2,261	20	\$754
<b>SRA Grants</b>					
Review of Template #1 information	1	60	\$2,261	20	\$754
Review of Template #2 information	1	0	\$0	0	\$0
<b>IIJA/P2 Grants</b>					
Review of Template #1 information	1	132	\$4,974	44	\$1,658
Review of Template #2 information	1	48	\$1,809	16	\$603
<b>IIJA Products Grants<sup>2</sup></b>					

Review of Products Template information	1	180	\$6,782	60	\$2,261
IIJA Community Grants <sup>2</sup>					
Review of Community Template information	1	180	\$6,782	60	\$2,261
<b>TOTAL</b>		<b>825</b>	<b>\$31,086</b>	<b>275</b>	<b>\$10,363</b>
<p><sup>1</sup> The reduction in Agency burden was estimated via interviews with three Regional P2 Program coordinators and best professional judgement.</p> <p><sup>2</sup> It is assumed that the burden of completing these templates will be similar to completing Template #1.</p>					

**15. Explain the reasons for any program changes or adjustments reported in hour or cost burden.**

There is no change in the reported hour or cost burden as this is a new ICR request.

**16. For collections whose results will be published, outline the plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

EPA will summarize and annually update the total savings and report on its website (see <https://www.epa.gov/p2/grant-programs-pollution-prevention#result>). EPA also anticipates developing an annual accomplishments report presenting these figures as well as documented successes across the grants.

Grantee recommendations will be put into the P2 Resources Search tool which will be published on an ongoing basis, with grantees inputting their project information (including facility information and recommendations made to those facilities) at the end of each year. The search tool will allow any grantee to see the results of other projects and P2 recommendations made to facilities. This will facilitate amplification of projects and help to highlight recurring benefits to facilities engaged in the program.

The P2 database will also create a variety of reports so that EPA can search, sort, and generate reports for their various inquiries, including annual accomplishments.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not applicable.

- 18. Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

EPA does not request an exception to the certification of this information collection.

## **SUPPLEMENTAL INFORMATION**

### PRA Burden Statement

This collection of information is approved by OMB under the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. (OMB Control No. 2070-NEW). Responses to this collection of information are mandatory for certain persons, as specified at 42 U.S.C 13101 and 15 U.S.C.3701. 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 public reporting and recordkeeping burden for this collection of information is estimated to be approximately 20 hours per response on average for Template #1 and 14 hours per response on average for Template #2. Send comments on the Agency’s need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden to the Regulatory Support Division Director, U.S. Environmental Protection Agency (2821T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

You can also provide comments to the Office of Information and Regulatory Affairs, Office of Management and Budget via <http://www.reginfo.gov/public/do/PRAMain>. Find this particular information collection by selecting “Currently under 30-day Review—Open for Public Comments” or by using the search function.

All comments received by EPA will be included in the docket without change, including any personal information provided, unless the comment includes profanity, threats, information claimed to be Confidential Business Information (CBI), or other information whose disclosure is restricted by statute. Do not submit electronically any information you consider to be CBI or other information whose disclosure is restricted by statute.

## **LIST OF ATTACHMENTS**

The attachments listed below can be found in the docket for this ICR or by using the hyperlink that is provided in the list below. The docket for this ICR is accessible electronically through <http://www.regulations.gov> using Docket ID Number: EPA-HQ-OPPT-2022-0773.

<b>Ref.</b>	<b>Title</b>
1.	<a href="#">Pollution Prevention Act</a>
2.	Summary of Consultation
3.	Response to Comment Document
4.	Template 1 EPA Form No. 9600-047
5.	Template 2. EPA Form No. 9600-048
6.	IIJA Communities EJ Template EPA Form No. 9600-055
7.	IIJA Products EJ Template EPA Form No. 9600-056