

RESPONSE TO PUBLIC COMMENTS

Pollution Prevention Grantee Data Collection in Standard Electronic Format

EPA ICR No. 2728.01

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List of Abbreviations

BIL	Bipartisan Infrastructure Law
CDPHE	Colorado Department of Public Health & Environment
EPA	Environmental Protection Agency
ICR	Information Collection Request
IIJA	Infrastructure Investment and Jobs Act
NPPR	National Pollution Prevention Roundtable
OMB	Office of Management and Budget
P2	Pollution Prevention
PRA	Paperwork Reduction Act
RFA	Request for Applications
SRA	Source Reduction Assistance
WA ECY	State of Washington, Department of Ecology

Introduction

This document is a response to comments submitted to the Information Collection Request (ICR) that EPA is planning to submit to the Office of Management and Budget (OMB). The ICR, entitled: "Pollution Prevention Grantee Data Collection in Standard Electronic Format" (EPA ICR No. 2728.01; OMB Control No. 2070-NEW), represents a new ICR. Before submitting the ICR to OMB for review and approval under the Paperwork Reduction Act (PRA), EPA solicited comments on specific aspects of the information collection summarized in the Federal Register Notice dated February 15, 2023. Comments were accepted until April 17, 2023. The ICR and accompanying material are available in the docket for public review and comment.

This ICR presents EPA's estimates for the burden and costs associated with the information collection activities related to pollution prevention grant programs and the collection of activity and results data from the grantees 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 three grant programs and is developing two new grant programs. The two new grant programs under development will be supported by the 2021 Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law (BIL), funding.

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. As of the date of the publication of the first *Federal Register* notice (February 15, 2023), EPA had developed two templates in MS Excel format. The templates are designed for two types of P2 and Source Reduction Assistance (SRA) projects: one 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. The completed templates will be collected annually by Regional grant administrators, 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 via the templates. Over the past 3 months, EPA has completed two additional spreadsheet templates for the new grant programs funded under IIJA. These spreadsheets are similar to the original templates with a few details changed to reflect the particulars of each new grant program. The two new templates have been added to the docket for public comment.

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 two standard reporting templates.

Table of Comment Sources

Below is a table summarizing the comments received and their identification numbers in the docket.

Name/Organization	Document ID (Docket Number: EPA- HQ-OPPT-2022-0773)
Colorado Department of Public Health & Environment (CDPHE)	0073-0005
National Pollution Prevention Roundtable (NPPR) ¹	0073-0006
State of Washington, Department of Ecology (WA ECY)	0073-0007

Issues and EPA Responses

The following sections of the report summarize the ten main issues of concern raised by the three commenters listed above. The number of instances of each issue is noted along with a summary and sources, followed by EPA's response.

Increased Administrative Burden

Summary: All three commenters expressed concern over the increased administrative burden that the required templates would impose on grantees. There is concern that information will need to be copied into the templates from other systems and/or will need to be modified to meet the reporting requirements, and this will have detrimental impacts to the technical aspects of their P2 programs.

Sources: (0005), (0006), and (0007)

EPA Response: In the Request for Applications (RFA), EPA emphasized the importance of reporting as a critical component of the effort: "Under this funding opportunity, EPA is emphasizing the importance of grantees documenting, reporting and sharing information on P2 best practices they identify and develop through their grant so that others can replicate those P2 practices and outcomes." EPA reiterates that the templates do not require collection of any new data. Required data to be reported reflects data outlined in the original RFA.

EPA has developed data collection systems (the proposed templates and forthcoming database) to collect information to share with a wider audience beyond P2 grantees and technical assistance providers. Our objective is to amplify the P2 message and information created by P2 providers to the greater business and industry community at large. We feel that reporting on established P2 metrics is needed so that EPA can document and share lessons learned as well as P2 best practices. EPA believes the additional reporting burden is necessary to document the P2 work performed by P2 providers and will lead to wider adoption of P2 practices. This concept is a cornerstone of the program.

In addition, to reduce the potential increase in administrative burden to the grantee, EPA will work with the grantees to import the data from an existing grantee database into the EPA database once developed, so as to not have to re-enter the data. EPA suggests that programs can also shift resources for programming to extract data and import it into the EPA database.

¹ NPPR is a membership-based non-profit organization that facilitates the exchange of technical knowledge and best practices on pollution prevention and sustainability among the public and private sectors. NPPR indicated that their comments were compiled from members and represent numerous states and grantees.

Reduced Ability to Provide Technical Assistance

Summary: All three respondents expressed concern over an increased administrative burden to include that the burden would then reduce the time available for staff to provide technical assistance to the businesses they are working with.

Source: (0005), (0006), and (0007)

EPA Response: EPA acknowledges that there is a tradeoff between measurement and reporting and the amount of technical assistance that grantees can provide. Given the importance of measurement and reporting to share information, EPA believes this tradeoff is worthwhile.

Privacy Concerns

Summary: Two commenters raised concerns over the privacy of business information being publicly available through the grant data reporting process. It was stated that by making data publicly available, businesses may no longer wish to participate in the program.

Sources: (0005) and (0006)

EPA Response: EPA understands that some facilities receiving technical assistance wish that their results remain confidential. In these cases, the P2 grantee need not report identifying information. As noted in the RFA, “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 city².” EPA recommends that P2 grantees seek out other businesses to work with that are willing to share the reporting metrics. Refinements of a future database may enable the entry and protection of confidential information. EPA will continue to explore this possibility.

Increased Costs Not Accounted for in Workplans

Summary: One commentator noted that grantees had not budgeted for use of a standard form in their workplans. Further, the commentator notes that grantees have already invested time and funding to establish electronic systems for maintaining data and reporting the required data to EPA. Additional time and funding would be required to modify these systems.

Source: (0005)

EPA Response: EPA has not modified the information required in reporting, only the format in which it is submitted. If grantees are feeling an additional burden they were not prepared for, EPA reminds grantees that the grant terms and conditions did indicate that grantees would be required to enter data into the database once OMB approval is granted and the RFA did include the recommended templates. Therefore, EPA believes that adequate notice was provided to include the effort in project work plans. It is anticipated that the database will reduce the level of effort as compared to the templates and will standardize the reporting for all the grantees.

Moving forward, EPA is making an effort to create the templates and new database in concert with each other so that there will not be an additional learning curve once the database is launched. EPA is also working to establish crosswalks to import information from existing data collection systems in use by grantees to reduce the data entry step for those grantees.

² FY 2022-FY 2023 P2 Grant Request for Applications, p. 28

Burden Estimate Reported in ICR

Summary: One commenter estimated that it would take a member of their staff approximately one hour to enter the data for one facility; this being an additional burden on their staff resources.

Source: (0007)

EPA Response: In response to additional time burden for data input into the templates, the hours noted in the ICR reflect an average of time estimates collected from nine grantees. It is possible that any particular grantee will assume more or less time than the 43 hours estimated for Template #1 (EPA Form No. 9600-048) and 22 hours estimated for Template #2 (EPA Form No. 9600-047).

Lessening of Data Quality

Summary: One commenter stated that using the prescribed template will result in reduced detail provided as part of the reports to EPA.

Source: (0005)

EPA Response: EPA understands and appreciates the concern expressed about the potential for the templates to lead to reduced details provided as compared to historical narrative reports. EPA will still collect narrative reports based on grant projects and will draw from them for supplemental story telling. However, EPA feels that the narratives have limited utility in amplifying results of grantee program work, hence we need structured data as requested on the templates.

EPA is requesting that all data be reported on the templates, which is a request for the data in a certain format, not an increase in the scope of data collection needed. Therefore, there should not be any impact on the scope of the deliverables. EPA feels that the grantees commitment to providing the requested data was clear in the terms and conditions of the grant, therefore there should not be any reduction in deliverables on the part of the grantee. If on an interim basis, a shift in or additional staffing is required to manage data transfer and reporting, EPA understands that shift may be necessary to obtain the data needed.

Metrics Not Beneficial

Summary: One commenter noted that they feel the templates separate the data from valuable elements of the success story related to the P2 project work; they believe reducing the reporting to these quantitative metrics missed the elements of relationship building and raising awareness.

Source: (0007)

EPA Response: Concern over the collection of proper metrics is appreciated and is a priority for EPA. As noted above, EPA is still requiring narrative reports that will allow for supplemental storytelling. Once the database is launched, there will be the ability to tie technical assistance to outreach efforts as appropriate and further enable storytelling. EPA is continuously improving the templates to record environmental outcomes and is seeking input for how to make this data useful for the purposes of widely sharing and encouraging adoption of P2 practices. Building relationships and increasing awareness is important, but not the ultimate end goal of the program as designed. EPA feels that promotion of P2 results will lead to behavior change, which is the ultimate desire.

Metrics Not Inclusive

Summary: One commenter noted that some metrics that they are aiming to collect are not reflected in the EPA templates, such as chemical and toxicity information.

Source: (0007)

EPA Response: With regards to additional suggested metrics, EPA is considering collecting chemical and toxicity information in the future. Also, methods are being improved to collect information on outreach and marketing as well as to collect tools grantees have generated.

Burden to Partnering Organizations

Summary: One commenter expressed concern over the increased burden to partnering organizations to collect required data, discouraging them from further collaboration.

Source: (0007)

EPA Response: EPA intends that the grantee incorporate the collection and reporting of required data in their project scope. If the grantee relies on partnering organizations to collect the data and those organizations are overburdened by data collection and reporting, it is suggested that the P2 provider assist the partnering organizations so as to shift the burden. For future applications, the P2 grantee should include any additional costs associated with grant data collection and reporting as part of the grantee tasks rather than the partners.

Rigid Format

Summary: One commenter stated that due to the rigid design of the templates, grantees will need to use another method to collect data, then transfer it to the templates, adding burden and taking time and value away from the P2 technical assistance.

Source: (0006)

EPA Response: As laid out in the RFA, the collection of the identified metrics is mandatory and a key component of the grant. The data collection process was designed to be rigid to ensure that EPA is getting the information required to show government accountability and thereby ensure the program gets continued funding. EPA is also driven to show the environmental impact of the implemented P2 activities to showcase to other businesses that they can benefit from implementing P2 practices on their own accord. The data collection structure also allows EPA to be able to compare across grant programs and communicate results and recommendations in a consistent fashion. Grantees can provide additional information in a less structured fashion as needed.