

**TITLE:** Environmental Protection Agency (EPA) Pollution Prevention (P2) Recognition Program

**OMB Control Number:** 2008-0004

**EPA ICR Number:** 2614.02

**ABSTRACT:**

The Environmental Protection Agency's (EPA) Pollution Prevention (P2) program is a voluntary program that encourages companies 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 Recognition Program is an annual, voluntary, and non-monetary 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 Recognition Program in EPA's Headquarters office and any of the 10 Regional Offices that choose to participate and implement a P2 Recognition Program.

A company's decision to participate in the EPA P2 Recognition 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 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 selection.

There will not be a monetary cost for companies to apply to the EPA P2 Recognition Program. EPA anticipates it will take applicants an average of less than 11 hours to complete, review, finalize, approve, and apply.

**Supporting Statement A**

## **1. NEED AND 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 42 USC § 13103 (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 2022- 2026 Strategic Plan (<https://www.epa.gov/planandbudget/strategicplan>), under Goal 7: Ensure Safety of Chemicals for People and the Environment; Objective 7.2: Promote Pollution Prevention. The P2 program 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 program is voluntary.

## **2. PRACTICAL UTILITY/USERS OF THE DATA**

The information collected by the EPA P2 Recognition 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 application to select and recognize companies who have implemented outstanding P2 practices.

## **3. USE OF TECHNOLOGY**

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 Recognition 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 Recognition Programs have demonstrated the success of this website submission system.

#### 4. EFFORTS TO IDENTIFY 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 recognition program upon approval of this ICR application. Other, non-federal partner organizations promote P2 through awards and recognition, but these programs are, for the most part, state-based and not offered at the regional or national level. Almost all information requested from respondents under this ICR is not available from other sources.

#### 5. MINIMIZNG BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

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 Recognition 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 Recognition Program are not required to have been supported by EPA's grant programs.

#### 6. CONSEQUENCES OF LESS FREQUENT COLLECTION

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

#### 7. 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.

#### 8. PUBLIC COMMENT AND CONSULTATIONS

##### 8a. PUBLIC COMMENT

Public comments were requested via the *Federal Register* on December 5, 2023 through February 5, 2024 (88 FR 84321) during a 60-day comment period The Federal Register Number is 2023-26623

##### 8b. CONSULTATIONS

EPA P2 Coordinators asked previous P2 applicants to provide input on the application collection efforts for this renewal package. The following partners provided input:

Affiliation	Region
Consolidated Nuclear Security	4
Management and Engineering Services LLC	8
Breckenridge Grand Vacations	8
Pacific Sea Food	10

Exotic Metals Forming Division of Parker Aerospace	10
---	----

P2 applicants provided feedback on the amount of time needed to respond to the application form. EPA incorporated feedback on the time needed to complete the form in the burden estimate. Some companies provided comments on the current application stating, “the application is perfect; I really love highlighting the unintended benefits. I think highlighting that in the recognition is inspiring to discuss.” One company recommended not reducing the character limit because you may lose an understanding of the breadth of some companies work. They recommend a compromise of the 500 character limit for most of the questions, adjusting the project description limit to 750 characters, and keeping the measurable results section at 1000 characters. Another respondent suggested having a place for them to say if they were assisted by an external agency with implementation of the P2 project.

#### **9. PAYMENTS OR GIFTS TO RESPONDENTS**

No payments or gifts will be provided to the respondents. After evaluation and selection of a submitted application, the business may receive a plaque, or certificate of recognition for implementation of their P2 project.

#### **10. ASSURANCE OF CONFIDENTIALITY**

EPA will not require and does not expect that companies will submit confidential information in the application. However, if the applicant asserts a company’s 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 company 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.

#### **11. JUSTIFICATION FOR 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 Recognition Program application.

#### **12. RESPONDENT BURDEN HOURS & LABOR COSTS**

##### **12a. RESPONDENTS/NAICS CODES**

Respondents are various types of companies from all North American Industry Classification System (NAICS) codes that are located in a state in an EPA Region implementing this program. Applicant activity includes filling out an application, working with the respective EPA P2 Coordinator (if selected) to discuss presentation logistics, attending the 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.

##### **12b. INFORMATION REQUESTED:**

Each applicant will answer the following short answer questions. Each question has a 1000-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.

**12c. RESPONDENT ACTIVITIES:**

This is a voluntary, non-monetary recognition 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 company. 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. § 1320.3(b)(2).

**12d. RESPONDENT BURDEN HOURS AND LABOR COSTS:**

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 days.

For this renewal, EPA used input from existing applicants 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.

EPA estimates receiving a total of 42 applications annually. Seven applications in six different regions as the program continues to grow. Table 1 shows the aggregate annual respondent burden and costs for the information collection activities associated with this program.

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, which can be found here: [https://www.bls.gov/oes/current/oes\\_nat.htm#15-0000](https://www.bls.gov/oes/current/oes_nat.htm#15-0000). EPA estimates an average respondent’s hourly labor rate (e.g. hourly plus 1.6% overhead) of \$105.98 (\$66.23 x 1.6) for Management Occupations (industry code 11-0000), \$69.68 (\$43.55 x 1.6) for Business and Financial Occupations (industry code 13-0000) and \$36.88 (\$23.05 x 1.6) for Office and Administrative Support (industry code 43-0000).

See Table 1 for burden calculations.

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

ANNUAL TOTAL NO. OF RESPONDENTS:            42 respondents

ANNUAL TOTAL NO. OF RESPONSES:	42 responses
ANNUAL TOTAL BURDEN HOURS:	457.8 hours
ANNUAL TOTAL COST TO RESPONDENTS:	\$33,012.84

Table 1. Respondent Burden and Costs. Totals were rounded to nearest decimal.

Information Collection Activity	Average Hours and Costs Per Respondent - (obtained from past applicants)				Total Hours and Costs Per Region			
	Manager	Technical	Clerical	Total Hours Per Respondent	Labor Costs Per Year	No. of Respondents Per Year	Total Respondent Hours Per Year	Total Cost Per Year
Hourly Rate	\$105.97	\$69.68	\$36.88					
Review instructions and eligibility requirements	0 hours	0.6 hours	0 hours	0.6 hours	\$41.81	42	25.2 hours	\$1,757.28
Gather Information	0.2 hours	6.8 hours	0 hours	7 hours	\$495.01	42	294 hours	\$20,790.42
Complete application form and optional supplemental materials	0.8 hours	1.6 hours	0.3 hours	2.7 hours	\$207.33	42	113.4 hours	\$8,707.86
Submit the application online	0 hours	0.6 hours	0 hours	0.6 hours	\$41.81	42	25.2 hours	\$1,757.28
Total annual respondent burden	1 hour	9.6 hours	0.3 hours	10.9 hours	\$785.96	42 responses	457.8 hours	\$33,012.84

### **13. RESPONDENT CAPITAL AND O&M COSTS**

Companies who choose to participate in the recognition 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 6 regions will implement a recognition program during the 3-year ICR period and will calculate total amounts for the 6 regions. EPA does not expect any additional cost ("non-labor") outside of what is listed under question 12, *respondent burden hours & labor costs*.

### **14. AGENCY COSTS**

#### **14a. Agency Activities**

EPA will engage in the following activities related to the recognition application:

- Update the application to be submitted by companies, post 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 make selection.
- Each region will have flexibility on type of recognition (plaque and/or certificate) and will purchase and present them to those selected.
- Each Region will have flexibility on when and where to present awards.
- Develop awardee summaries for P2 websites.

#### **14b. Agency Labor Cost**

Table 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with the EPA P2 Recognition Program. The annual hourly burden is approximately 136 hours at a cost of \$13,287 per EPA Region. The three-year, bottom-line Agency burden for the life of this ICR is approximately 2448 hours at a cost of \$239,175 (6 regions over 3 years).

The hourly labor rates used to determine the estimated costs to the Agency are based on the 2023 GS pay schedule for Washington D.C. locality pay available from the Office of Personnel Management. EPA estimates an average hourly labor cost of \$135.28 for managerial staff and \$91.60 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	Agency Burden Hours and Costs Per Application				Total Agency Burden Hours and Costs		
	Manager	Professional	Total Hours Per Activity	Labor Costs Per Year	No. of Agency Activities Per Year	Total Agency Hours Per Year	Total Cost Per year
	Hours Per Activity	Hours Per Activity					
Hourly Rate	\$135.28	\$91.60					
Update application to be submitted by applicants, post to website, and communicate requirements for applying	5	40	45	\$4,340.40	1	45	\$4,340.40
Maintain a tracking system to record each applicant's application status and review submission		5	5	\$458.00	7	35	\$3,206.00
Respond to applicant questions about applications		1	1	\$91.60	7	7	\$641.20
Determine which applicants deserve recognition	2	5	7	\$728.56	7	49	\$5,099.92
<b>Total Agency Burden Per Region</b>	<b>7</b>	<b>51</b>	<b>58</b>	<b>\$5,618.56</b>		<b>136</b>	<b>\$13,287.52</b>
<b>Total Agency Burden for 6 Regions</b>	<b>42</b>	<b>306</b>	<b>348</b>	<b>\$33,711.36</b>		<b>816</b>	<b>\$79,725.12</b>
<b>Total Agency Burden over 3 year period</b>	<b>126</b>	<b>918</b>	<b>1044</b>	<b>\$101,134.08</b>		<b>2448</b>	<b>\$239,175.36</b>

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

ANNUAL TOTAL AGENCY BURDEN HOURS: 816 hours

ANNUAL TOTAL COST TO AGENCY: \$79,725.12

#### 14c. Agency Non-Labor Costs

There are no non-labor costs associated with this information collection request.

#### 15. REASONS FOR CHANGE IN BURDEN:

Since the initial ICR was approved in 2021 we have a better estimate on how many applications will be received in each region, how many regions are interested in implementing regional recognition programs, and how long it takes respondents to fill out the application. When the initial ICR was written, the P2 program used estimations and also reached out to State recognition programs to assist us with calculating the burden. State recognition programs are more rigorous and time consuming, therefore our original burden was calculated higher than we anticipated the burden may be. We originally estimated each region would receive approximately 10 applications each year and that 5 regions would implement recognition programs. Over the last three years, we had an average of around 6 applications per region and only 3-4 regions implemented programs. For this ICR we are estimating 6 regions will implement programs and we will receive an average of 7 applications per region. Additionally, we had a small universe of past P2 awardees that assisted us with calculating the actual total burden hours, which we did not have when we initially launched this program. The overall burden estimate for this collection is 517.2 hours lower than the current ICR.

#### 16. PUBLICATION OF DATA:

This program doesn't anticipate publication of data. Below is a draft timeline with activities for the recognition program. These dates and activities may change over the course of this ICR.

<b>Proposed Dates:</b>	<b>Activity:</b>
<b>April 8 – May 17<sup>th</sup></b>	Open Regional Award Application for Businesses
<b>Week of May 20<sup>th</sup></b>	Send Compliance Review Package with ECHO Search to HQ This can take a few months to get back (maybe longer if a lot of regions are on board) from Office of Enforcement and Compliance Assurance and can be done concurrently while we are reviewing applications.
<b>Week of May 27<sup>th</sup></b>	Review Applications
<b>Week of June 3<sup>rd</sup></b>	Hold Review Panel
<b>June</b>	Prepare Briefing Materials on Selection of Award Winners
<b>June 30<sup>th</sup></b>	Deadline to Receive Concurrence from Division Directors (Or RA)
<b>Week of July 8<sup>th</sup></b>	Notify Winners of their Selection

**17. DISPLAY OF OMB CONTROL NUMBER EXPIRATION DATE ON INSTRUMENTS:**

EPA is not seeking approval to not display the expiration date for OMB approval of the information collection.

**18. CERTIFICATION STATEMENT:**

EPA is not aware of any exception to the topics of the certification statement identified in Certification for Paper Reduction Act Submissions.