

Pollution Prevention Grant Program Guidance for Applicants

The following guidance for applicants was compiled to benefit prospective applicants seeking to apply for grant or cooperative agreement funding under the Pollution Prevention Grant Program.

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A. Applicant Eligibility

Question A.1: *Can an individual or small business apply for P2 grant funding? Why not?*

No. EPA policy prohibits individuals and small businesses from applying for funding under this grant program.

Question A.2: *If I am a private entity, can I partner with an eligible entity to apply for grant funding?*

Yes. A partnership may take place between a private entity and an eligible entity. However, only the eligible entity may apply for grant funding. The private entity is not eligible to apply. The eligible entity as the sole applicant will be responsible for submitting the proposal to the applicable EPA Region. If selected for funding the eligible entity will be responsible for overseeing the execution and implementation of the work plan. The private entity may participate on the work plan, and if negotiated with the eligible entity may receive funding to conduct specified work during the project period.

Question A.3: *Can I sub-award work to private consultants or private businesses?*

Yes. Funding may be used to provide subgrants or subawards, including the use of subawards or subgrants to fund partnerships with private consultants or private businesses, provided the recipient complies with the requirements for subawards or subgrants contained in 40 CFR Parts 30 or 31, as applicable. The applicant must compete contracts used for services and products, including consultant contracts and conduct cost and price analyses, to the extent required by the procurement provisions of the regulations in 40 CFR Parts 30 or 31, as applicable. The regulations also contain limitations on consultant compensation. The applicant is not required to identify

subawardees/subgrantees and/or contractors (including consultants) in his/her proposal/application. However, if the applicant does, the fact that an applicant selected for award has named a specific subawardee/subgrantee, contractor, or consultant in the proposal/application does not relieve the applicant of his/her obligation to comply with subaward/subgrant and/or competitive procurement requirements as appropriate.

The applicant may not award sole source contracts to consulting, engineering or other firms assisting applicants with the proposal solely based on the firm's role in preparing the proposal/application.

B. Eligible Projects

Question B.1: *The RFP states that “P2 does not include any practice which alters the physical, chemical or biological characteristics or the volume of a hazardous substance, pollutant or contaminant through a process or activity which itself is not integral to and necessary for the production of a product or providing a service.” What is EPA interested in funding?*

EPA is interested in funding work plans which offer pollution prevention (P2) technical assistance, provides resource tools or training to businesses to prevent or reduce pollutants from entering the air, water or land. These types of practices can help reduce hazardous materials and limit risks to human health and the environment.

Some examples of P2/source reduction projects include, but are not limited to: providing technical assistance on source reduction to manufacturers or small businesses. This can be accomplished through offering training on equipment or technology modifications; technical assistance on modifying processes or procedures modifications and extending the life of non-discarded hazardous materials; training on redesigning products that use fewer materials; or training on the substitution of raw materials to support a more environmentally preferable method. For additional information on allowable P2 grant projects, summaries of awarded P2 grants are provided at: <http://www.epa.gov/p2/pubs/grants/index.htm#p2summ>.

Alternatively, work plans that involve waste treatment, clean-up, removal/disposal, or recycling by-products that are polluting the air, water, or land and causing environmental and public health concerns are not the kinds of actions that will receive funding under this program. Rather, these actions are better suited for clean-up and recycling initiatives. For more information on recycling and clean-up activities, please visit EPA’s Office of Resource Conservation and Recovery website at <http://www.epa.gov/epawaste/conservation/rrr/recycle.htm>.

C. Use of Grant Funding

Question C.1: *The solicitation states that EPA will have approximately \$4.1 million in assistance agreement funding and the typical range of awards will be between \$20,000-\$180,000. My project costs are estimated at \$179,000. Can I apply for the maximum allowable grant?*

Yes. However, all funding estimates provided in the RFP are subject to Congressional appropriation. Also, under the P2 grant program the Region has the authority to review proposals and the discretion to decide not to issue any awards.

Question C.2: *The RFP notes an applicant may organize their proposal to be considered for partial funding. What is partial funding? How does it work?*

When deciding how much P2 grant funding to award selected applicants, the Region may reserve the right to partially fund proposals by funding discrete activities, portions, or phases of a proposed project. A Region which partially funds a proposal will do so in a manner that will not prejudice any applicant or affect the basis upon which a proposal or a portion thereof was evaluated or selected for award in order to maintain the integrity of the competition, the evaluation and the selection process.

In order to be considered for partial funding, the applicant must construct the proposal to show clearly delineated project activities or phases with separate budget estimates for each activity/phase of the project.

Question C.3.: *The RFP notes an applicant may organize the proposal to be considered for incremental funding. What is incremental funding? How does it work?*

P2 grant funding may be issued increments over the life of the grant project period. For example, an applicant may request \$40,000 in incremental funding to support a project period of two years. If the project is selected for an award, the Region may decide to fund the project in increments of \$20,000 per year. This decision is solely made by the Region, which reserves the right to decide which work plans merit incremental funding. Incremental funding is not guaranteed rather it is contingent on a range of factors – i.e., funding availability in subsequent years, the applicant's performance history and programmatic priorities defined by the Region. To be considered for incremental funding, the applicant must provide budget plans that detail the activities to be performed during each project period.

Question C.4: *Can funds be used for a project that will start before the expected award date?*

Yes. EPA's regulations allow applicants to incur project costs up to 90 days before EPA officially awards the grant or cooperative agreement. If an applicant incurs costs more than 90 days before the award, the EPA Project Officer must alert the Grants Management Office and prepare a written justification to allow those incurred costs.

Question C.5: *If EPA funds are used to help develop a toolkit for an industry sector, who owns the toolkit once it is complete?*

The recipient will own the toolkit. At the time of the grant closeout, an agreement can be made between EPA and the recipient on future uses and accessibility.

Question C.6: *Can we buy new hybrid or electric vehicles using grant dollars to reduce greenhouse gas emissions?*

Yes, provided the purchase of the hybrid or electric vehicle is a reasonable and necessary part of the P2 project and will show a direct correlation to providing technical assistance, training or useful tool to benefit a business. Applicants must have strong justification for purchases and purchases of hybrid and electric vehicles. Vehicles may not be purchased for personal or routine organizational use.

Question C.7: *Can we purchase equipment using P2 grant funding? What happens to the equipment after the grant is over?*

Equipment may be purchased with grant funding as noted in 40 CFR 31.32 provided the equipment will help to provide technical assistance, training to tools to businesses. Recipients may use such equipment in the program for which it was acquired as long as needed, regardless of whether the project or program continues to receive federal funding. The recipient may also use the equipment in other activities currently or previously supported by a federal agency. When the recipient no longer needs the equipment for the original project or program, or for other activities currently or previously supported by a federal agency, and the fair market value is less than \$5,000, the equipment may be kept, sold, or disposed of by the applicant with no further obligation by EPA. If the fair market value of the equipment is \$5,000 or more, the recipient may keep or sell the equipment at which point EPA would have the right to proceeds from the sale. The amount of compensation will be computed by calculating the percentage of federal participation in the cost of the project – this will be assessed on the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient will need to submit a formal request to EPA. Refer to 40 CFR 31.32. In cases where a recipient fails to take appropriate disposition actions, the awarding agency may direct the recipient to take such actions.

Question C.8: *Can we purchase fixtures (e.g., CFLs, solar heaters, clean diesel technologies etc) and retrofit buildings or vehicles using the grant dollars?*

Yes, such a proposal may be considered for funding as long as the following conditions are met – the programmatic threshold and submission requirements of the RFP are met, the purchase is not the primary objective of the proposed project and the purchase is reasonable and necessary to demonstrate how technical assistance, training or resource tools applying P2 work will benefit businesses.

D. Submitting a Proposal

Question D.1: *Can I submit a proposal to multiple Regions?*

An applicant may submit a proposal to multiple Regions, provided the projects are distinct and separate, and the work takes place in the Region that received the proposal. The applicant may not submit the same proposal to multiple Regions; submit a proposal that involves more than one Region; or propose work that does not take place within the Region which received the proposal.

Question D.2: *If I am located in one Region, may I submit a proposal to another Region?*

Yes. Applicants from one Region may submit proposals to other Regions, provided that the project takes place in the Region which received the proposal.

Question D.3: *May I submit a proposal that involves multiple states within the same Region?*

Yes. Applicants may submit proposals that involve multiple states within the same Region.

Question D.4: *What happens if I submit a proposal that meets EPA's P2 strategic priorities, but does not meet the Regional priority areas for the Region to which I am submitting my application?*

All proposals must meet the threshold program requirements provided in the RFP. In the section entitled, "Threshold Program Requirements," proposals must address EPA's P2 strategic priorities, at least one of the regional priorities and national focus areas, and address other noted requirements.

E. Proposal and Application Review Process

Question E.1: *The grant proposal process can be time consuming. Can you tell me if my project is a good fit for this grant solicitation?*

In accordance with EPA's Assistance Agreement Competition Policy (EPA Order 5700.5A1),¹ P2 program staff may not meet with individual applicants to discuss draft proposals, provide informal comments on draft proposals, or provide advice to applicants on how to respond to ranking criteria. Applicants are responsible for the contents of their proposals and applications. However, consistent with the provisions in the announcement, P2 program staff will respond to questions from applicants regarding threshold eligibility criteria, administrative issues related to the submission of the

¹ EPA Order 5700.5A1 - http://www.epa.gov/ogd/competition/5700_5A1.pdf.

proposal, and requests for clarification about the announcement.

Question E.2: *How long does the proposal review process usually take?*

The proposal review can take between 3-5 weeks.

Question E.3: *How will I be notified of EPA's decision?*

Applicants that are ineligible to apply for funding or those that have submitted unsuitable proposals will be notified by the Region within 15 calendar days.

Eligible applicants submitting suitable proposals will be notified by the applicable Region within 5 weeks of the review decision. The notification will either be delivered by e-mail or mail. Selected applicants will be asked to submit application materials (i.e., additional information and applicable grant forms). The Region will notify applicants of final selections usually 60 – 90 days from the date of submitting their proposal. All formal award notices will be issued by EPA's Office of Grants and Debarment.

Question E.4: *May I review applications that were successful in obtaining previously awarded P2 grant funds?*

A request to review successful applications needs to be sent via email or mail to the EPA Region responsible for making the selections.