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Monday, April 17, 2023

RE: Agency Information Collection Activities; Proposed Collection and Request for Comment;  
Pollution Prevention (P2) Grantee Data Collection in Standard Electronic Format  
Agency/Docket Numbers: EPA-HQ-OPPT-2022-0773  
FRL-10208-01-OCSP

To whom it may concern:

The National Pollution Prevention Roundtable (NPPR) Board of Directors on behalf of the Leadership & Voluntary Programs Workgroup would like to submit for review its response to the Pollution Prevention (P2) Grantee Data Collection in Standard Electronic Format.

The 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. The NPPR goals include the advancement of pollution prevention by maintaining and improving opportunities for exchanging ideas and facilitating coordination of efforts; promoting education and awareness of pollution prevention concepts, programs, methods, accomplishments, and benefits; and, fostering constructive, mutually beneficial relationships with other organizations which have related missions. NPPR's Leadership & Voluntary Programs Workgroup focuses on programs that promote and recognized the implementation of pollution prevention initiatives. Leadership and voluntary P2 programs often work with a large number of businesses.

NPPR commends and acknowledges the work of EPA, the Office of Chemical Safety and Pollution Prevention, and all the EPA Regional staff that work with grantees to promote and implement pollution prevention practices across the Country.

The comments below were compiled from members and represent numerous states and grantees. They summarize concerns for requiring grantees to submit data in a specified format. Note that grantees currently submit required data. Comments are specific to the format required, not the data.

- This new request effects existing grants. Workplans developed by grantees, including staff time needed for reporting and estimated outcomes, did not necessarily include the use of the EPA templates. This puts a strain on grantees that planned to report all required data without using the standardized templates.
- The ICR notes that "EPA will create a module that allows grantees to submit the data electronically" and that "it is anticipated that electronic reporting will reduce the burden on grantees to report the needed information." Since the database is still under development,

grantees cannot know the level of effort that will be needed to import data. Many 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.

- The creation of a publicly sharable database could make it more difficult to partner with businesses. Privacy concerns, as well as concerns about federal databases and their use for solicitation and legal review, could prevent businesses from partnering with P2 programs and their willingness to share results.
- The proposed templates are rigid in their design. Because the templates cannot be edited and have no flexibility, grantees must use another method to track grant work. Therefore, the use of the templates requires duplicative tracking.
- The requirement to use rigid templates forces more time and funding to be devoted to administrative work, which limits grantees ability to provide technical assistance. The amount of administrative work required, when the application and reporting process are considered, take valuable staff time away from pollution prevention implementation efforts. The administrative work could outweigh the value of funding provided through the grant.

NPPR's Leadership & Voluntary Programs Workgroup appreciates the opportunity to be part of the P2 conversation and commends EPA for its efforts to engage P2 grantees. Strong collaboration and partnership are the essence of a successful P2 ecosystem. NPPR appreciates EPA's commitment to fostering innovation through collaboration and we look forward to future opportunities.

Sincerely,

National Pollution Prevention Roundtable  
Board of Directors  
On behalf of the Leadership & Voluntary Programs Workgroup