



# Collecting and Reporting Results

## 1. Definition of Terms

**Projected results:** Estimates made for the purpose of forecasting future EPA results.

**Actual results:** Results from something that was verified to have been implemented at the facility or entity in question.

**Annual results:** Actual results attributed to the fiscal year when they occurred. The P2 Program uses **new** annual results to set annual targets for and report annual results to the Agency's Office of the Chief Financial Officer (OCFO) for Agency Goal 4.

For informative purposes to illustrate the continuing benefits of P2, the P2 Program also adds annual **recurring** results to new annual results in its Explanation of Results for its Annual Performance Report to Congress. "Recurring results" are environmental benefits produced in prior years that continue to deliver environmental benefits over multiple years. The rationale for reporting "recurring results" stems from EPA's Science Advisory Board; in 2008, the Environmental Engineering Committee recommended the P2 Program avoid undercounting by counting results over the life of a technology, product or process, so long as its use is stable and not displaced. The new annual and recurring results from the Greenhouse Gas measure contribute to the Agency-wide Greenhouse Gas reduction measure that is displayed under Goal 1.

**Quality Assurance Project Plan:** A process or plan that is in place to ensure that environmental data submitted to EPA is understandable to and useful for EPA.

**Eligible results:** The right quantity and type of results to report. Eligible results stay within our program-specific and metric-specific guidelines and reflect the percentage of our influence.

**Our metrics:** The outcome measures of our program. Grantees and partners use our metrics to report their performance to us on a semi-annual and annual basis.

- ACS Measure 262: Gallons of water reduced through Pollution Prevention.
- ACS Measure 263: Business, institutional, and government costs reduced through Pollution Prevention efforts.  
Important note: Institutional and government cost savings cannot be reported under P2 grants. Also, cost savings from nonhazardous waste reduction cannot be counted because the program does not have a nonhazardous waste reduction measure.
- ACS Measure 264: Pounds of hazardous materials reduced as inputs or emissions through Pollution Prevention.  
Important note: This includes pounds of hazardous materials reduced as inputs to a process or reduced as emissions to air, water, or land.
- ACS Measure 297: Metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) reduced or offset through Pollution Prevention.

**Itemized Results:** These are end-of-year results that break out P2 implementation actions and related environmental and cost benefits at the facility level.

**HQ:** In this document, “HQ” refers to the P2 Program located in US EPA Headquarters. The P2 Program is in the Chemistry, Economics and Sustainable Strategies Division, in the Office of Pollution Prevention and Toxics (OPPT). “HQ” can also refer to the Environmental Assistance Division, also in OPPT, which administers the Annual Commitment System, facilitates P2 targeting and reporting, and communicates with the OCSPP Senior Budget Office and OCFO.

## II. Guidelines



**Projected results:** EPA allows projected results for forecasting purposes only. Projected results appear in grant proposals and P2 opportunity assessment reports. Projected results may not be reported as actual results.

**Actual results:** Actual results must be measured by a metered or transparent non-metered methodology.

**Annual results:** Regions report their new annual P2 results in the Annual Commitment System. HQ sends OCFO the total new annual P2 results for Goal 4.

HQ also computes annual recurring results for Regions and HQ based on established formulas based on the Science Advisory Board input described above. HQ includes the recurring results in the Explanation of Results in the Annual Performance Report under Goal 4, and in the contribution to the Agency-wide Greenhouse Gas measure under Goal 1.

**Cut-off date:** The end of EPA's Fiscal Year is September 30. Regions must report final end-of-year results by March 31<sup>st</sup> of the following Fiscal Year. This extension accommodates grantees with programs that collect calendar-year results, while respecting EPA managers who need nearly real-time data to assess performance. After March 31, HQ will still attribute late EOY results to the right FY, but they may be too late to impact performance assessment.

**Stick to the fiscal year:** Headquarters wants to get all Regions aligned with attributing results to the year in which they occurred, even if you have to report late. State leadership program results occur the year the State reports to you (even though the programs recognize facility results usually achieved the year before). This policy accommodates grantees with leadership programs, while respecting our annual commitment process which quantifies new aims, not existing achievements.

**Recurring:** Headquarters applies a 4-year recurring formula to the new annual results from Regions (1 new year + 3 recurring years).

**Quality Assurance Project Plan (QAPP):** Environmental data submitted to EPA should be understandable to and useful for EPA. Each Region may define QAPP terms for a grantee or partner based on the intended use of the data, consistent with RFP requirements for itemizing results.

**Eligible results:** Pollution Prevention Program results have boundaries on what can be counted. Within these boundaries, compute P2 Program influence as a percentage.

### **Program boundaries**

- Business results – yes, count.
- Institutional results –
  - Count if funded by Environmental Program & Management (EPM) funds, whether for Source Reduction Assistance (SRA) grants or direct projects.

- Do not count if funded by P2 Categorical grants, which are just for P2 assistance to businesses.
- Local and State government results –
  - Count if funded by EPM funds, whether for Source Reduction Assistance (SRA) grants or direct projects.
  - Do not count if funded by P2 Categorical grants, which are just for P2 assistance to businesses.
    - If State Leadership Programs are funded by P2 Categorical grants –
    - (a) Require State grantees to state in their grant reports whether they have taken out State and local government results from the Leadership program results they report to us and, if not, why not.
    - (b) Also require State grantees to itemize their Leadership program results in their grant reports or to state the exact burden they face in itemizing.
    - (c) Report (a) and (b) clearly in the itemization methodology sections of P2 GrantsPlus.
    - (d) If State grantees cannot assure that State and local government results have been taken out and/or cannot share their Leadership program results in an itemized fashion, then consult with Headquarters to determine what percentage of results to count so potential State and local government results can be discounted.
  - Do not count any State or local EPEAT purchasing efforts, since EPA lacks legal authority to promote non-Federal EPEAT purchasing.
- Federal government results –
  - Count Federal results that are attributed to the P2 Program:
    - Region 9 counts a percent of Federal EPEAT purchasing.
  - Count Federal Green Challenge results for cleaning products, electronics, transportation and water.
  - Do not count Federal Green Challenge results for paper.
  - Avoid counting Federal results embedded in State Leadership program results reported by State grantees.
    - (a) Require State grantees to state in their grant reports whether they have taken out Federal results from the Leadership program results they report to us and, if not, why not.
    - (b) Also require State grantees to itemize their Leadership program results in their grant reports or to state the exact burden they face in itemizing.

- (c) Report (a) and (b) clearly in the itemization methodology sections of P2 GrantsPlus.
  - (d) If State grantees cannot assure that Federal results have been taken out and/or cannot share their Leadership program results in an itemized fashion, then consult with Headquarters to determine what percentage of results to count so potential Federal results can be discounted.
- If grant or direct activities focus on materials, the primary emphasis must be on hazardous, rather than non-hazardous, materials, due to our program measure.

### **Metric Boundaries**

- **ACS Measure 262 guidelines:** Millions of gallons of water reduced through Pollution Prevention.
  - 100% of any water conserved by avoiding water effluent – yes, count here.
  - Savings from reusing hazardous materials – yes. See Measure 264, “Reuse of hazardous materials” bullet.
  - P2 resources must have been expended.
- **ACS Measure 263 guidelines:** Business, institutional, and government costs reduced through Pollution Prevention.
  - Savings from reducing or recycling non-hazardous materials – no.
  - Byproduct synergy investments related to non-hazardous material– no.
  - Anything covered in our P2 Cost Savings Calculator—yes, except non-hazardous waste reductions.
  - Savings from reusing hazardous materials – yes. See Measure 264, -“Reuse of hazardous materials” bullet.
  - Reduced labor costs – yes.
  - Use grant terms (consistent with RFP requirements for itemization) to get facility-level attribution of cost savings to implemented P2 practices.
  - P2 resources must have been expended.
- **ACS Measure 264 guidelines:** Pounds of hazardous materials reduced through Pollution Prevention.
  - **SO<sub>x</sub>/NO<sub>x</sub>** - if SO<sub>x</sub>/NO<sub>x</sub> is avoided from higher boiler efficiency or lower boiler use – yes, count. If SO<sub>x</sub>/NO<sub>x</sub> is avoided from lower use of the utility grid (EPA green-energy purchases included) – no, do not count. The cap-and-trade rule sets a cap

on utility SO<sub>x</sub>/NO<sub>x</sub> emissions; as a practical matter, reductions are being traded.

- **CO<sub>2</sub>** – do not count under this measure, all CO<sub>2</sub> reductions should be reported under Measure 297.
- Hazardous inputs avoided in products and processes – yes, count. An input is hazardous if it would be a RCRA waste constituent upon discard or would be released during use or disposal as a CAA HAP or criteria pollutant, a CWA conventional or water quality criteria pollutant, a TRI pollutant, a TSCA chemical of concern, or a state-regulated pollutant.
- Hazardous pollutant releases to air, water and land avoided – yes, count. Hazardous pollutants are CAA HAPs and criteria pollutants, CWA conventional and water quality criteria pollutants, TRI pollutants, TSCA chemicals of concern, RCRA waste constituents, and state-regulated pollutants.
- Avoided water effluent – do not count the water content under Measure 264. Divide the amount of water effluent avoided by 10,000 to eliminate the water quantity. Count the remainder here under Measure 264.
- Nonhazardous inputs or releases avoided – do not count.
  - For State Leadership Programs:
    - (a) Require State grantees to state in their grant reports whether they have taken out nonhazardous recycling and reduction results from the Leadership program results they report to us and, if not, why not.
    - (b) Also require State grantees to itemize their Leadership program results in their grant reports or state the exact burden they face in itemizing.
    - (c) Report (a) and (b) clearly in the itemization methodology sections of P2 GrantsPlus.
    - (d) If State grantees cannot assure that nonhazardous recycling and reduction results have been taken out and/or cannot share their Leadership program results in an itemized fashion, then consult with Headquarters to determine what percentage of results to count so potential nonhazardous results can be discounted.
- Reuse of hazardous materials – count the lifecycle benefits associated with the avoided manufacturing of virgin hazardous materials. These are measured in hazardous materials avoided, energy use and CO<sub>2</sub> emissions avoided, water use avoided and costs saved. Tabs are being added to our calculators for this purpose.
- Reuse of nonhazardous materials – count only the associated reductions in MTCO<sub>2</sub>e under Measure 297. Neither cost nor upstream water savings can be counted because reducing nonhazardous materials is not a goal of the P2 Program.

- Getting reductions in nonhazardous materials should not serve as a primary purpose of a P2 grant.
  - P2 resources must have been expended.
- **ACS Measure 297 guidelines:** Metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) reduced or offset through pollution prevention.
- Anything covered in our P2 Greenhouse Gas Reductions Calculator – yes, count.
  - Require grantees – through grant terms and conditions – to itemize their results, consistent with the RFP itemization requirement. This means itemizing at a facility level what was done to get MTCO<sub>2</sub>e results, such as electricity, fuels, BTUs, chemicals, travel miles, water savings, reuse of nonhazardous materials, .
  - Either reuse of nonhazardous materials or out-of-process recycling (if occurring as an ancillary activity to primary P2 activities under a grant) – yes, count. Grantees should name the WARM or similar model they used to convert to carbon reductions. See [www.epa.gov/warm](http://www.epa.gov/warm) Measure 297 has no hazardous material limitation.
  - Reusing hazardous materials – count the MTCO<sub>2</sub>e reduced. Tabs are being added to our calculators for these calculations in FY 2015. See the relevant bullet under Measure 264 above.
  - P2 resources must have been expended.

### **Count a percentage that reflects the link to our program**

- Grants: When funding grants outright or matching, Regions should usually count 100% of a grantee's actual results. Exceptions are state leadership programs or the like or combined grant funds.
- State leadership/award programs or P2 Planning laws (where states are not providing technical assistance):
    - Considering EPA's influence is less here than in technical assistance programs, don't report anything higher than 30%, especially since results can be large. Report a minimum of 10% of results. Consider grant funding, and any other assistance through FTE, meeting space, materials, or web resources, when deciding in the range of 10-30%.
    - If increasing the percentage reported from one year to the next, state why the percentage has increased.
  - Grants for collecting follow-up results:
    - If you award a grant for collecting results that accrued from prior technical assistance, some of which was funded by your previous grant(s):

- If the prior technical assistance was funded entirely by your previous grant, count 100% of the results.
- If other funding was involved, count the percentage of results that reflects your funding percentage.
- Combined grants:
  - When the grant authorities of our program and another program are used together, and the programs have overlapping measures, then share the results according to the level of funding.
  - For multi-Region grants, share results among Regions equitably.
- Staff and directly-funded projects: Regions should count 100% of actual results from projects that are supported by staff resources and/or Environmental Program and Management funding. The exception is if shared funding dictates sharing results with another entity or EPA program office.
  - If a Regional media or enforcement office conducts a P2 activity and is not reporting that result, the Regional P2 program can ask for permission to report it, so long as the P2 program has contributed something to the overall effort. Please provide a clear explanation when reporting. If a Regional project or P2 Roundtable heavily influences the passage of state regulation, take 100% of one year's regulatory reductions.
- Congressional line-item funding for P2 work: Count 100% of results.

**Itemized results:** Consistent with Request for Proposal requirements, grant terms and conditions should require all grantees to plan for itemizing facility-level results and related implementation steps or to provide clearly stated reasons of undue burden or confidentiality concerns.

### ***III. Useful Measurement Tools for GHG Reductions, Cost Savings and Pound Reductions***

EPA offers three customized calculators for facilities and technical assistance providers to measure the annual environmental and economic benefits of implemented P2 activities. These tools are the GHG Reduction Calculator, the P2 Cost Savings Calculator, and the Gallon-to-Pound Converter (soon to be the Hazardous Pound Reduction Calculator). The tools focus on P2-project performance results and use EPA media-program calculations for consistency. HQ conducts training webinars on these tools upon request. The P2 Program's website maintains current versions of the tools and concise summaries of tool capabilities. The calculators are available here: <http://epa.gov/p2/pubs/resources/measurement.html>

Regions are encouraged to use these tools and share them with their grantees.



#### ***IV. Using our Custom P2 GrantsPlus Database***

P2 GrantsPlus is EPA's database for managing Regional projects in the P2 Program. The main purpose of P2 GrantsPlus is to make Regional P2 projects and results transparent as elements of the P2 story. All Regions have reading rights to everything in the database, just like Headquarters. Each region writes its own entry. HQ manages access and type of access.

P2 GrantsPlus reinforces planning for facility-level results, and makes it easy to upload and find facility-level results and implementation steps.

P2 GrantsPlus also makes records management convenient. It is synchronized with EPA's LAN and generates standard and custom reports. It has simple navigation, scrolling entries for multiple years, automatic date-stamp for entries, and built-in note taking.

Online video training is available. If you need user support, please contact Natalie Hummel and Kathy Davey.

#### ***V. FYI – ACS Commitment Schedule***

This the approximate schedule for the annual ACS commitment process.

- Late January – HQ submits draft commitments to OCFO.
- February-July - Regions engage NPM, states, tribes on draft commitments.
- Late April - HQ initiates bidding process in ACS.
- July - Regions enter draft commitments in ACS.
- August – September– HQ and Regions agree on commitments in ACS.
- Mid-October – OCFO posts finalized commitments on EPA Sharepoint Site.