U.S. EPA Community-Scale Air Toxics Monitoring Request for Applications EPA-OAR-OAQPS-20-05 Questions and Answers As of March 13, 2020

The U.S. Environmental Protection Agency (EPA) is accepting applications for funding for air toxics monitoring projects under the Community-Scale Air Toxics Ambient Monitoring grants competition (EPA-OAR-OAQPS-20-05). As part of the Agency's mission to protect human and environmental health, EPA periodically awards these grants to help state, tribal and local air agencies conduct air quality monitoring projects to better understand air toxics in their communities.

The Request for Application and all application forms are available at

<u>https://www.grants.gov/web/grants/applicants/search-opportunity-package.html</u>. Search for Funding Opportunity Number EPA-OAR-OAQPS-20-05. The deadline to apply is March 30, 2020.

Questions at time of posting (February 13, 2020) – Questions added after posting begin on page 4

What are air toxics?

Air toxics, also called hazardous air pollutants (HAPs), are pollutants known to, or suspected to, cause cancer and other serious health effects. The Clean Air Act lists 187 different air toxics.

What are community-scale air toxics ambient monitoring grants?

EPA provides community-scale air toxics ambient monitoring grants to assist eligible state, tribal, and local air agencies that want to conduct monitoring and analysis to identify, or more accurately define the extent of, the impact of air toxics in their communities. The Clean Air Act lists 187 different air toxics, which also are called "hazardous air pollutants" or HAPs. Unlike widespread pollutants such as ozone or particulate matter, air toxics tend to vary from community to community, based on the mix of industrial sources and motor vehicles in each.

Where does the grant money come from, and how much is available?

Funding for the grants comes from State and Tribal Assistance (STAG) funding. Congress appropriates STAG funds for states and tribes to use in implementing and maintaining environmental programs. EPA anticipates awarding a total of up to \$5 million during the 2020 calendar year. Individual grants cannot exceed \$750,000.

Who may apply?

Recipients of the grants must be air pollution control agencies that: 1) meet the definition of "air pollution control agency" in Section 302(b) of the Clean Air Act; and that, 2) are eligible to receive grants under Section 105 of the Clean Air Act. This generally means state air agencies, certain local air pollution agencies, and tribal air agencies.

Can my community organization apply?

Only state, tribal, and local air agencies can receive the grants under this competition. However, air agencies may partner with an outside organization on the monitoring projects funded by the grants. They also may use grant money to provide "sub-grants" to an outside organization who is otherwise not eligible to apply for a grant under this competition. These are referred to as "subawards" in the application document.

What types of projects will the grants fund?

EPA is accepting grant applications for projects that fall in to four categories:

- 1) Characterizing the impacts of air toxics in a community (community-scale monitoring);
- Assessing the impacts of air toxics emissions from specific sources (near-source monitoring);
- 3) Evaluating new and emerging testing methods for air toxics; and
- 4) Analyzing existing air toxics data and developing or enhancing analytical, modeling and/or implementation tools (such as combining different data sets for deeper analysis and model improvement).

How many grants will be awarded?

EPA anticipates awarding 10 to 20 grants in calendar year 2020, depending on available funding and the quality of the applications the Agency receives. EPA is making this estimate based on the amount of money available and our experience from past grant competitions.

How will EPA decide which projects to fund?

Projects will be evaluated based on seven criteria: project summary and approach; environmental results; programmatic capability and past performance; budget; expenditure of awarded grant funds; leveraging of additional funds/resources; and community benefits, engagement and partnerships. EPA also may consider Agency priorities and geographic diversity in selecting grant recipients. See Section V. of the RFA beginning on page 21.

Can the grants be used to pay for existing or past air toxics monitoring?

The grants are for new monitoring projects only.

Do monitoring projects need to address particular air toxics to be eligible?

While grant applications may address any individual or suite of air toxic pollutants, air toxics of particular interest to EPA in this grant competition include ethylene oxide, chloroprene, benzene, 1,3-butadiene, and metals such as hexavalent chromium, nickel and arsenic.

What is the deadline to apply?

The deadline for submitting applications is March 30, 2020. Note: EPA asks applicants to notify the Agency via email by March 4, 2020, that they are planning to apply within one month after the RFA opens. The notification should go to Nealson Watkins (<u>watkins.nealson@epa.gov</u>). Instructions for making this notification are in the Request for Applications on page 1.

When will my Agency find out if we will receive a grant?

EPA anticipates notifying applicants within about 60 days of the application deadline if they have been recommended to receive a grant. This notification will be sent to the person who signs the application or to the project contact listed in the application. The official notification of an award will be made by EPA's Grants and Interagency Agreements Management Division.

My state has applied for these grants before. Is there anything new in the process?

EPA urges applicants to thoroughly read the Request for Application to ensure you include everything that is required for your application (see Section III.C. Threshold Eligibility Criteria beginning on page 15 and Section IV.C. Content of Application Package beginning on page 17 of the RFA). For example, this year's applications must include a statement on quality assurance; in previous grant competitions, qualtiy assurance was addressed in project plans after grants were awarded.

If EPA is awarding the grants during calendar year 2020, that means grants could occur in two different federal fiscal years. Does that mean I will have to apply again later this year?

No. EPA may award money during both fiscal years from the set of applications the Agency receives in response to the Request for Applications.

Does my agency have to provide matching funds?

Matching is not required; however, leveraging is one of the criteria EPA uses to evaluate applications. This can include funds and other resources leveraged from state, tribal or local government, businesses and other nongovernmental organizations as appropriate. Instructions on providing information on leverage are included in the Request for Application.

Where I can I get the application forms?

The Request for Applications, along with all application forms and the ability to apply, is available at Grants.gov. You can find the full package at https://www.grants.gov/web/grants/applicants/search-opportunity-package.html and search for Funding Opportunity Number EPA-OAR-OAQPS-20-05.

Questions Added After Posting (as of March 5, 2020)

Question 1 (2/14/2020):

Is a local health department eligible to apply for a grant under this competition?

Answer 1:

A local health department may be eligible to apply for a grant under this competition if it meets the definition of an "air pollution control agency" from the Clean Air Act and has the responsibility for enforcing ordinances or laws relating to the prevention and control of air pollution and is eligible to receive a Section 105 grant. Note that the RFA does not require entities to currently have a Section 105 grant.

From page 13 of the RFA (Section III.A.):

"...the only entities eligible to submit applications under this announcement are air pollution control agencies, as defined by Section 302(b) of the Clean Air Act (CAA), that are also eligible to receive grants under Section 105 of the Clean Air Act."

Per the Clean Air Act, Section 302:

(b) The term "air pollution control agency" means any of the following:

- (1) A single State agency designated by the Governor of that State as the official State air pollution control agency for purposes of this chapter.
- (2) An agency established by two or more States and having substantial powers or duties pertaining to the prevention and control of air pollution.
- (3) A city, county, or other local government health authority, or, in the case of any city, county, or other local government in which there is an agency other than the health authority charged with responsibility for enforcing ordinances or laws relating to the prevention and control of air pollution, such other agency.
- (4) An agency of two or more municipalities located in the same State or in different States and having substantial powers or duties pertaining to the prevention and control of air pollution.
- (5) An agency of an Indian tribe.

UPDATED ADDITION TO ANSWER (3/5/2020):

If an agency meets the above definition, it must also have substantial responsibilities for carrying out the applicable implementation plan under Section 110 of the CAA in order to also be eligible to receive a CAA Section 105 grant. If an agency does not have significant responsibilities for carrying out the applicable implementation plan for that region, then it is not eligible to directly apply for a Community-Scale Air Toxics Ambient Monitoring grant.

Question 1.a. (2/20/2020):

Are tribes that do not have approval for Treatment as a State (TAS) for purposes of carrying out air program eligible to apply for a grant under the community-scale air toxics competition?

Answer 1.a:

A tribe does not have to have TAS to be eligible. A tribe may be eligible to apply for a grant under this competition if it meets the definition of an "air pollution control agency" from the Clean Air Act and has the responsibility for enforcing ordinances or laws relating to the prevention and control of air pollution. We also will note that the RFA (<u>https://www.epa.gov/grants/community-scale-air-toxics-ambient-monitoring</u>) does not require entities to currently have a Section 105 grant. See answer 1. directly above.

Question 2 (3/4/2020):

Are letters of recommendation counted towards the page count?

Answer:

Letters of recommendation do not count towards the page limit and can be submitted using the "Optional Attachment" form in Grants.gov.

Question 3 (3/4/2020):

Are references or citations required in the application and do they count towards the page count?

Answer:

Citations and references are not required, but if you think citations or references are necessary for your application to address the requested information for the project narrative (see Section IV.C.2., on pages 18-20 of the RFA), then you should include them and they will be counted towards the 10-page limit of the project narrative.

Question 4 (3/4/2020):

We plan to submit an application that will be a joint project between us and another agency. Are two point of contacts (with equal responsibility) allowed?

Answer 4:

One entity needs to be the submitter and potential grantee. The applicant can include additional contacts in the Key Contacts Form (EPA Form 5700-54) as part of their application. If selected, the primary grantee would then provide a subaward to the other entity. See also EPA's Subaward Policy, <u>https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients</u>.

Question 5 (3/5/2020):

The title of the current RFA is "Community-Scale Air Toxics Ambient Monitoring". Could you give any guidance as to what is meant by "ambient"?

Answer 5:

EPA recently updated its interpretation of ambient air, mainly with regard to air over facility property, and you can read the guidance here: <u>https://www.epa.gov/nsr/ambient-air-guidance</u>.

Importantly, the regulatory definition of ambient air, in 40 CFR §50.1(e), remains unchanged as "that portion of the atmosphere, external to buildings, to which the general public has access."

Question 6 (3/11/2020):

Are the webinar slides available online?

Answer 6:

The slides from the webinars are available at: <u>https://www.epa.gov/amtic/community-scale-air-toxics-ambient-monitoring-csatam</u>.

Question 7 (3/11/2020):

Can we propose a modification of one of the listed categories in Section I.B. Scope of Work?

Answer 7:

No, the proposed work contained in applications must fall into one of the four categories from the current RFA (pages 5-9).

Question 8 (3/11/2020):

Does the project duration have to be three years?

Answer 8:

No, it does not have to be exactly three years. Three years is the maximum project period length.

Question 9 (3/11/2020):

Can portable monitors be used in a grant funded under this competition, such as setting up air quality online monitoring?

Answer 9:

Depending on the specifics of the proposed project, this could be included if the work falls within one of the four categories under the Scope of Work section (pages 5-9) and follows the cost principles of 2 CFR Part 200 Subpart E (<u>https://www.ecfr.gov/cgi-bin/text-idx?SID=186cd2fb8780983c7159d14a09601c9e&mc=true&node=sp2.1.200.e&rgn=div6</u>).

Question 9a (3/11/2020)

Can PM_{10} monitoring be included in a grant funded under this competition?

Answer 9a:

Depending on the specifics of the proposed project, this could be included if the work falls within one of the four categories under the Scope of Work section (pages 5-9) and follows the cost principles of 2 CFR Part 200 Subpart E (<u>https://www.ecfr.gov/cgi-bin/text-idx?SID=186cd2fb8780983c7159d14a09601c9e&mc=true&node=sp2.1.200.e&rgn=div6</u>).

Question 9b (3/11/2020):

Can citizen science be an element of this project?

Answer 9b:

Depending on the specifics of the proposed project, this could be included if the work falls within one of the four categories under the Scope of Work section (pages 5-9) and follows the cost principles of 2 CFR Part 200 Subpart E (<u>https://www.ecfr.gov/cgi-bin/text-idx?SID=186cd2fb8780983c7159d14a09601c9e&mc=true&node=sp2.1.200.e&rgn=div6</u>).

Question 10 (3/11/2020): How many grants do you expect to fund?

Answer 10:

As noted on pages 1 and 13 of the RFA, EPA anticipates awarding approximately 10 to 20 assistance agreements from this announcement, subject to the availability of funds, the quality of applications received, and other applicable considerations.

Question 11 (3/11/2020):

Can a state submit more than one application? Can multiple applications be selected from one state? Is there a maximum per application or per state?

Answer 11:

Eligible entities can submit multiple applications, and they would need to be separately submitted through grants.gov. Each application needs to focus on one of the four categories in the Scope of Work section of the RFA (pages 5-9). There is no cap on the number of applications an agency can submit, but there is a maximum cap of \$750,000 per application (pages 12 and 15 of the RFA).

Question 12 (3/11/2020):

How soon in 2020 would the funds be available?

Answer 12:

EPA anticipates selected applications to be funded around September 1, 2020. However, this is dependent on how long the review and selection process takes and the amount of time it can take to process grant awards.

Question 13 (3/11/2020):

How many applications did EPA receive under the last Community-Scale Air Toxics Ambient Monitoring competition?

Answer:

EPA received 30 applications under the competition from 2017.

Question 14 (3/11/2020)

Is funding provided each year of a three-year grant?

Answer 14:

It is anticipated that EPA will provide all of the funding for a selected grant at the time when the grant is awarded.

Question 15 (3/11/2020):

Can an organization be a sub-awardee on multiple applications proposing the same topic?

Answer 15:

It would be allowable to have a partner entity be included on multiple different applications.

Question 16 (3/11/2020):

Can the grant be used to fund consultants/contractors? How much time is the principal investigator expected to contribute to the project?

Answer 16:

Yes, the eligible entity can issue sub-awards to a consultant or contractor. The amount of time of contribution is up to the applicant. The contribution of all participants and the associated budget will need to be reflected in the application. Applicants should note the link to Additional Provisions for Applicants Incorporated into the Solicitation on page 26 of the RFA relative to contracts and subawards (<u>https://www.epa.gov/grants/epa-solicitation-clauses</u>). Applicants should also note that there is a cap on consultant fees as part of EPA's General Terms and Conditions <u>https://www.epa.gov/grants/epa-general-terms-and-conditions-effective-october-1-2019-or-later</u>).

Question 17 (3/11/2020):

Does EPA foresee a similar grant opportunity in 2021?

Answer 17:

No, EPA typically offers this funding opportunity every two to three years, subject to the availability of funding.

Question 18 (3/11/2020):

Can funds be used to pay for additional personnel?

Answer 18:

Yes, funds can pay for personnel, plus any of the other cost categories identified in Appendix B of the RFA.

Question 19 (3/11/2020):

Do applications have to only address one of the four criteria areas, or can I submit an application that covers multiple criteria areas?

Answer 19:

No, you must clearly target one of the four scope of work categories listed in the RFA on pages 5-9, per application. If you have ideas that span two categories, you might consider two separate applications that individually focus on a single scope of work category.

Question 20 (3/11/2020):

If two qualifying agencies combine for a project, can they apply for \$1.5 million in funding?

Answer 20:

The limit per application is \$750,000. The two agencies could submit two separate applications for \$750,000 each. However, EPA cannot award multiple grants that cover the same costs (see 2 CFR 200.403, <u>https://www.ecfr.gov/cgi-bin/text-</u>idx?SID=59b8c96ccbd9a7743dcb76e777bd01de&mc=true&node=se2.1.200 1403&rgn=div8).

Question 21 (3/31/2020):

We realize this competition is focused on hazardous air pollutant (HAP) compounds; however, can other air toxics be considered, such as PFAS compounds? For instance, would monitoring that includes PFAS-type compounds as part of emissions characterization be eligible?

Answer 21:

The Community-Scale Air Toxics Ambient Monitoring grants have historically addressed listed Hazardous Air Pollutants (HAPs), which are the stated focus for this competition in the Request for Application, as stated on page 1:

This notice announces the availability of funds and solicits applications for proposals for projects designed to assist state, local, and tribal air agencies in identifying and characterizing air toxics, also known as hazardous air pollutants (HAPs).

As there are numerous existing and emerging air toxics issues dealing with listed HAPs that can be addressed and are within the scope of the competition, the Agency will not consider applications that focus on compounds outside the current list of HAPs.