

**AGENCY:** ENVIRONMENTAL PROTECTION AGENCY (EPA)

**TITLE:** "Local-Scale Air Toxics Ambient Monitoring"

**ACTION:** Request for Applications (RFA)

**RFA NO:** OAR-EMAD-05-16

**CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NO:** 66.036

**SUMMARY:** Formal Agency responses to questions/comments regarding the subject solicitation.

**DATE:** August 9, 2005

Question 1: There were two tribal grants last year, FY2004, which I believe included the Gila River cooperative project and the Nez Perce Project on Pulp and Paper emissions. I would like to know what these projects entail and how the tribes are implementing them. We would like to submit a project grant app ourselves and would like to get a general idea of what the OAR is looking for in the area of innovative research from tribal air programs. I'm thinking other tribal air folks may be interested as well. Any help would be greatly appreciated.

Answer 1: There were three tribal grants awarded in response to RFA OAR-EMAD-03-08; the Gila River and Salt River Indian Communities are part of the "Phoenix Area Monitoring for the Joint Air Toxics Assessment Project (JATAP)," and the Nez Perce Tribe's "Characterization of Air Toxics Concentrations Around a Kraft Pulp and Paper Mill Facility, Lewiston, Idaho." The workplans for both projects, to include project-specific contact information, are available at <http://www.epa.gov/ttn/amtic/toxfy04.html>.

Question 2: I'd like to get clarification on a couple of issues related to eligibility. First, I want to be sure that state governments/agencies, local governments / agencies, and Federally recognized Tribal governments/agencies are eligible to apply and receive the grants. Second, I want to ask if a subgrant to a university must be competitively bid.

Answer 2: You are correct in your understanding of eligibility. Regarding whether a recipient must compete its subgrants, the Agency certainly encourages competition, but does not / can not require recipients to do so. However, please note the distinction between / differing requirements for acquiring services and products via contract versus establishing a subgrant relationship (see Section II Part E of RFA OAR-EMAD-05-16).

Question 3: The solicitation seems to preclude true partnerships, e.g., between a tribal government and a state university. The solicitation seems to impose a requirement to manage a competition on a tribal government that the tribal government may not have the resources to carry out. Is my reading of the RFP correct?

Answer 3: The RFA does not preclude an eligible entity from forming a sub-relationship with, as referenced in your question, a state university (Section II Part E of RFA No OAR-EMAD-05-16 states "Subgrants or sub-awards may be used to fund partnerships with universities, non-profit organizations, or another eligible entity as described in Section III."). Regarding project management responsibilities, a successful recipient must be capable of managing their grant. That said, a recipient may draw upon the experience / expertise of a number of resources to include the EPA Regional Project Officer, the cognizant EPA Grant Specialist, and their own sub-recipient(s) / partner(s), to gain helpful insight in managing their grant.

Question 4: In the RFA for Local-Scale Air Toxics Ambient Monitoring grant solicitation, section D.1 the model QAPP template is not listed at the URL given.

Answer 4: You are correct; the model QAPP template is posted at <http://www.epa.gov/ttn/amtic/airtoxqa.html> under the title "Model QAPP for Local-Scale Monitoring Projects."

Question 5: Is it correct that agencies which received funding under the previous air toxics local-scale monitoring competition (RFA OAR-EMAD-03-08) are not eligible to apply under this solicitation?

Answer 5: Agencies which received funding under the previous air toxics local-scale monitoring competition (RFA OAR-EMAD-03-08) are eligible to apply under this solicitation. However, in the interest of capacity building, preference may be afforded to those applicants who did not receive an award under the previous competition, as suggested by the language contained in Section V.B.1 of the RFA.

Question 6: In section I.B.4.b, evaluating air quality models is listed as a justification for community-scale monitoring. Does this mean that EPA might fund some modeling work under this RFA, or will money be used only for monitoring that could be used to validate separately funded modeling efforts?

Answer 6: Monitoring for purposes of evaluating / validating existing air quality models, to include executing model runs as an integral part of the project, may be considered an acceptable objective / justification for community-scale monitoring projects.

Question 7: I've started looking into the grant writing process. I have not written one before. I'm beginning by acquiring information and research. At the URL <http://www.epa.gov/seahome/grants.html> titled EPA Grant-Writing Tutorial, it says: This program is currently being revised to reflect recent changes in EPA policy and is temporarily unavailable for viewing or download from this Web site. A new version of the program should be available here soon. Being summer and

having a time-line for grant submittal August 22, and knowing how some things take more time than planned, do you have any idea when this might be back on line? Is this program valuable/needed for this task?

Answer 7: The grant writing tutorial to which you refer is an EPA Region V software package; unfortunately, this program will be unavailable during the open period for this RFA. An alternate resource for your use in developing your application is the EPA's Office of Grants and Debarment URL (<http://www.epa.gov/ogd/>). Also, the project plans for grants awarded under the previous year's local-scale monitoring solicitation are available for review at <http://www.epa.gov/ttn/amtic/toxfy04.html>.

Question 8: Would a CAFO (hog factory) be considered an air toxic source?

Answer 8: Principle emissions from Animal Feeding Operations (AFOs) include particulate matter, ammonia, hydrogen sulfide, and Volatile Organic Compounds (VOCs). There may be components of the emitted particulate matter (e.g., some metals), as well as some VOCs, that are listed as Hazardous Air Pollutants or HAPs (listing is available at <http://www.epa.gov/ttn/atw/orig189.html>). Though AFOs are considered neither major nor area sources, a variety of agricultural operations, to include AFOs, are being assessed for relevance and significance as HAP sources.

Question 9: Can the grant funds be used to build / outfit and operate a mobile monitoring platform?

Answer 9: Establishing a mobile monitoring platform, in and of itself, does not constitute an acceptable project. If such an activity simply represents the most cost-effective means by which data will be collected (i.e., the equipment and supplies portion of a larger project proposal), it may be acceptable as a project element, but not an entire project. The solicitation is clear in terms of acceptable project categories / broad objectives and criteria against which each proposal will be evaluated; to receive due consideration, an applicant must ensure their proposed project design is consistent with / responsive to the information presented in the RFA.

Question 10: The RFA states that the project period will be 18-24 months. Can you tell me what the likely time-frame is for project approvals and funding to be made available so I can gauge the likely beginning and ending dates of the project period?

Answer 10: The post-selection / pre-award period duration can vary greatly, largely dependent upon the number and degree of administrative, technical, and programmatic matters to be addressed during negotiations between the awarding EPA Region and the prospective grant recipient.

That said, we anticipate awards during the 4<sup>th</sup> quarter of CY2005 and 1<sup>st</sup> quarter of CY 2006; funding will be made available upon award.

Question 11: Are State Universities eligible to apply for the Local-Scale Air Toxics Ambient Monitoring funding opportunity (RFA No OAR-EMAD-05-16)?

Answer 11: No. However, state universities are eligible as subgrantees under this competition; as stated in Section II Part E of RFA No OAR-EMAD-05-16, "Subgrants or sub-awards may be used to fund partnerships with universities, non-profit organizations, or another eligible entity as described in Section III."

Question 12: Today we have this great application where we have this problem with Air Toxic X at Location Y, and are writing our proposal around that specific problem. Based on our planning etc. with this grant proposal, we don't expect to begin sampling until 1 year after the grant is awarded. By that time the original problem may have subsided because the local and state government has taken actions to resolve the problem. However, we feel confident that there are other very similar problems to address, perhaps involving a different air toxic and a different location, and there could potentially be another "hot spot" that the community gets up in arms about. Could we, one year into the grant, petition EPA to allow us to change the target (i.e. specific air toxic) and the specific location, if we otherwise follow all the original plans?

Answer 12: Given that the total duration of these projects is 18-24 months (to include all data analysis, presentation of results, and final report submitted and accepted), a proposal in which sampling is not expected to begin until a year after the grant is awarded may not be viewed favorably, dependent upon the justification provided in the project plan. Regarding the premise that the original problem for which the application is being submitted may have subsided due to local or state government action, and that "...there could potentially be another "hot spot" that the community gets up in arms about..." likewise may not be viewed favorably. There are many communities with problems for which there is little to no potential for local / state government involvement to address the issue (i.e., the award of a grant from this RFA may represent the only real opportunity to address the matter of concern). Further, the EPA proposal reviewers endeavor to achieve a balanced set of projects via the selection process; a post-award change of focus may result in some form of redundancy, contrary to program objectives. However, one option may be that if evidence such as monitoring data were available prior to the referenced local / state actions, the project emphasis could be to measure the effectiveness of those actions. Finally, a recipient can "...petition EPA to allow us to change the target (i.e. specific air toxic) and the specific location, if we otherwise follow all the original plans." However, this is not a preferred scenario.

Question 13: Is there any funding limitation for equipment installation / maintenance labor costs?

Answer 13: There are no such limitations. Carefully consider, however, in developing your proposal that awards resulting from this RFA must contain all requisite elements of a “complete” project to include data analyses and well-articulated expected outcomes; all applications will be evaluated according to the criteria stated in Section V of RFA OAR-EMAD-05-16.

Question 14: In the section on Evaluation Criteria, the RFA includes "community scale monitoring proposals for areas deemed as high risk per the 1999 NATA" as another factor to consider. How could one get access to the 1999 NATA as I believe that it is not out for public review?

Answer 14: The 1999 NATA state preview release and public release will be widely announced to their intended audiences when they occur.

Question 15: Are state public health departments and, in particular, environmental health departments that conduct community scale health assessments which are based upon environmental data, eligible to apply?

Answer 15: The eligibility was recently amended to clarify eligible recipients (<http://www.epa.gov/oar/grants/05-16amend01.pdf>) citing air pollution control agencies, as defined under Section 302(b) of the Clean Air Act, as the eligible recipients. Though state public / environmental health departments are not explicitly referenced, they could be considered eligible if they possess “substantial powers or duties pertaining to the prevention and control of air pollution” and/or are “charged with responsibility for enforcing ordinances or laws relating to the prevention and control of air pollution.”

Question 16: We are interested in characterizing emissions of outdoor wood furnaces (OWF). This is an emerging source that has been largely uncharacterized to this point. Assessing concentrations at the flue/stack would be the best way to create pollutant profiles of the source to be used in air quality modeling to determine/approximate downwind impacts. Would a proposal that focused primarily on source characterization by making measurements at the flue/stack, as opposed to just general ambient measurements, be considered?

Answer 16: No. The intent of this solicitation is not to fund projects in which the major activity is source stack testing.

Question 17: We are considering proposing a study characterizing near-source ambient wood smoke concentrations (section 1.B.1 of the RFA - Source ID and characterization) from residential wood-fired space-heating sources. But to make sense of the ambient wood smoke data, we need to be able to perform some concurrent "in the field" (not laboratory) source measurements ("stack testing") as a significant part (20%?) of the project. In this context, is stack testing a task that could be funded under this ambient monitoring RFA?

Answer 17: In the context you provided, stack testing is a task that could be funded under this ambient monitoring RFA provided that 1) it is incidental to interpreting ambient data to be collected in the project and is not the primary data collection task, and 2) the project description include a clear and reasonable explanation of how the task output will directly contribute toward achieving both the "Source Identification and Characterization" goals, and the larger programmatic goals (e.g., transferability), as described in the RFA. The proposal should also demonstrate that the source testing is not duplicative of information already available.

Question 18: Our higher education institution is exploring possibilities of integrating air/water monitoring into basic science courses as a way to insure that young students acquire a solid scientific foundation for their interests in environmental advocacy. While an educational purpose is not primary to the EPA, I note that the request for applications stipulates that the grants can support partnerships with higher education institutions. In this context, can undergraduate programs, faculty, or students be funded through this grant?

Answer 18: As you aptly noted, grants **can** support partnerships with higher education institutions, so long as it's for the intended purpose / aimed at meeting program goals (as stated in the RFA). If your proposal intent is, as you seem to have indicated, educational support, then you should not consider this program as a viable funding source as this is not one of the goals / intended uses for these funds.

Question 19: We are planning to partner with a non-profit agency; is it acceptable in our proposed project to allocate a majority of the budget resources to our non-profit agency partner?

Answer19: While the project budget allocation is at the applicant's discretion, please be aware that "Capacity building – whether the applicant proposes to retain a large fraction of the project budget within their agency or a partner air pollution agency..." (Section V.B.1 of the RFA) may be a factor considered in the selection process.

Question 20: In reviewing the RFA and sections of 40 CFR Parts 30 & 31 - it is not clear whether under the rules of a cooperative agreement we can build into

the Proposal a Subgrant/subcontract to a University (public) for specific elements of the work that are not readily competitively bid.

Q1. Can we include a subcontract or subgrant to public university for:

a) Laboratory analyses?

b) Field team subsidy (only to offset added labor of additional sample collection)?

Q2. If this is allowed, is there any specific information required to be included in the 12 page proposal (other than a letter of commitment)?

Q3. Can we include a [small] subcontract to the private consultant who has unique expertise (the lead exposure modeler for the health study)?

Q4. Can we include a [small] subcontract to an expert at a private university?

Answer 20: You indeed may form a partnership (i.e., non-competed) with a public university. The specific answers are as follows:

1. A subgrant (not a subcontract as this would be acquisition) is allowable; the activities cited in both a. and b. are allowable.

2. Section IV Part B.2.g.7, states "a description of the roles of the applicant and partners, if applicable." What this means for you is identify which participating entity will be responsible for each aspect of the project plan. Further, note that Section IV Part B.3 calls for a "Detailed Itemized Budget. Provide a budget for the following categories, specifying unit costs..." The applicant's budget need include the total "Contractual costs"; a detailed itemized budget need be included for each participating entity (note that the sum of the subgrant and subcontract budgets must equal what the applicant shows in "contractual costs").

3 and 4. You're certainly allowed to have subcontractual relationships. Regarding the rules you must follow in establishing and executing these relationships, I refer you to 40 CFR Part 31.36(b)(1), procurement standards, which states "Grantees and subgrantees will use their own procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable federal law, the standards identified in this section, and if applicable, § 31.38." I recommend you work, at your earliest convenience, with the applicant organization's contract administration staff on this matter.

Question 21: I have a question about how to tailor the proposal that we eventually submit for this RFA. Specifically, for the first phase of the monitoring project we are completing for EPA we committed to monitor once every twelve days. We are aware that the preference seems to be that sampling be conducted once every six days. The problem is that the labs doing the analysis charge so much per sample that it drives the overall price of the proposal so high that it's difficult to be competitive. For example, if the ceiling on the grant is a maximum of \$500,000, as in this case, and the lab wants close to \$400,000 to analyze samples, it makes it very difficult to propose something that's likely to be successful. In order to deal with this, we have considered submitting a proposal

with alternatives (e.g., one budget for sampling every six days; one budget for sampling once every twelve days; one budget for sampling at two sites out of five sites once every six days and sampling once every twelve days at the remaining three sites). Is this presentation of options concept something that EPA could handle or would it be too complicated to attempt to evaluate a proposal that offered options? Another possibility might be to submit three or more separate proposals. I am aware that EPA would accept multiple proposals in more than one category. But how about multiple proposals in the same category?

Answer 21: You are correct in your assessment that 1 in 6 day sampling is preferred; 1 in 12 day sampling does not provide what would generally be considered a sufficiently robust data set for meaningful results. Each National Air Toxics Trends Station (NATTS) performs 1 in 6 day sampling for multiple Hazardous Air Pollutants (HAPS) at a fraction of the analytical costs you've cited. I strongly encourage you to explore alternate laboratory options; one such option is the EPA's contract laboratory (services and pricing attached). Submission of a multi-option proposal is not in the applicant's best interest; it's incumbent upon the applicant to carefully assess the proposed project objectives, determine a reasonable range of options to meet those objectives, perform a cost / benefit analysis to optimize the proposed project plan, and submit a single proposal that best addresses the needs upon which the project proposal is based. Submission of multiple proposals in the same category for the same general project scope by the same applicant is unacceptable.