

**2021 Targeted Airshed Grant Program  
EPA-OAR-OAQPS-21-03  
Questions and Answers**

**QUESTIONS AND ANSWERS FOR THE 2021 REQUEST FOR APPLICATIONS**

*As of June 4, 2021*

**Question 1 (5/07/21):**

I understand funds cannot be combined with other federal grants, however, may funds be combined with state funding?

**Answer 1:**

Yes, this is allowed and is considered voluntary cost share or leveraging, depending on the nature of the funding. See Section III.B. starting on page 15 of the RFA for further information.

**Question 2 (5/07/21):**

Is there a deadline for equipment implementation or operation?

**Answer 2:**

There's not a specific deadline, but it should be during the life of the project period for the grant award. The expected award dates will begin around January 2022 and be for five years from the start date (see Section II.D. on page 14).

**Question 3 (5/07/21):**

For a vehicle replacement project, are there model year requirements for both the vehicle being scrapped and the replacement vehicle?

**Answer 3:**

No, targeted airsheds does not have model year restrictions like the U.S. EPA's Diesel Emission Reduction Act (DERA) program. The only limit is that the same replaced engines were not funded by another EPA grant awarded in 2015 or later and the engine must be replaced by a cleaner device (see Section I.C., pages 7 – 8 of the RFA).

**Question 4 (05/07/2021):**

Have any past awardees that were in a PM<sub>2.5</sub>-only nonattainment area (not ozone) been successful at obtaining targeted airshed grant (TAG) funding for heavy duty vehicle electrification projects either as diesel replacements or electric vehicle infrastructure? The TAG [past awardees web page](#) does not specify how they were eligible for TAG funding (ozone vs PM<sub>2.5</sub>).

**Answer 4:**

There have been a few mobile source projects selected for funding in PM<sub>2.5</sub> nonattainment areas. However, keep in mind that applications will be scored under this year's competition in part based on how the proposed project reduces emissions to help the nonattainment area make progress toward attainment (see Section V.A., criteria 1 and 3 on pages 21-22 of the RFA). The following mobile source projects were funded in PM<sub>2.5</sub> nonattainment areas:

Questions and Answers for FY 2021 Targeted Airsheds RFA  
6/4/2021

Year	State	Nonattainment Area	Recipient	EPA Funding	Description
2020	Pennsylvania	Allegheny, PA	Allegheny County Health Department	\$5,666,950	Replace public-transit buses with zero-emission alternatives
2016	Utah	Logan and Provo, UT	UDEQ	\$2,477,250	Replace school buses with lower-emission alternatives
2017	Utah	Logan, UT	UDEQ	\$3,184,875	Replace heavy-duty trucks with cleaner alternatives
2016	Utah	Logan, UT	UDEQ	\$2,477,250	Repair and replace vehicles that do not meet emission standards
2018	Utah	Salt Lake City, UT	Utah Department of Environmental Quality (UDEQ)	\$4,698,489	Repair and replace light-duty vehicles that do not meet emission standards

**Question 5 (05/12/2021):**

For a replacement project, will there be any documentation required to show that a vehicle has been taken out of service after the new vehicle is delivered?

**Answer 5:**

Yes, see the top of page 8 under Section I.C.2.a. Specifically, photographic evidence is required to prove that replaced devices were scrapped or permanently removed from service in the applicable nonattainment area. Additionally, as noted later in that section, a device description tracking sheet will be required.

**Question 6 (05/13/2021):**

Please clarify who is subject to requirements of the awarded grant besides the grantee.

**Answer:**

**Contractors** are not subject to compliance requirements of the federal program as a result of the agreement; however, similar requirements may apply for other reasons, as noted in Appendix C on page 48. The grantee must comply with the procurement provisions in 2 CFR 200.317 through 327.

**Subrecipients** are subject to the same federal grant requirements as the pass-through entity, as noted in Appendix C on pages 49-50.

**Beneficiaries receiving participant support cost (PSC)** are not required to comply with 2 CFR Parts 200 and 1500 or the grant terms and conditions; however, beneficiaries must abide by requirements to ensure that the funds are used only for authorized purposes. The beneficiary also must abide by the written agreement described in Appendix C on page 51.

**Question 7 (5/17/2021):**

Is electric vehicle (EV) infrastructure eligible?

**Answer:**

It can be eligible if the applicant is able to clearly show the infrastructure is necessary to support a documentable emission reduction activity(ies) or technology(ies). See Section I.C.; Section III.C.2. through 4.; and Appendix B, II. Section 1.a. through d. and Section 3.

**Question 8 (5/17/2021):**

Can an EV bus be added to a fleet under this grant? Must a combustion engine bus be replaced or removed from service?

**Answer:**

For replacement projects, the main requirement is that the replaced device is less efficient and higher polluting than the device that is replacing it (see Section I.C.2.a.). Adding a vehicle without replacing a less efficient one is only allowed if it is a demonstration project that meets the description under Section I.C.2.c.; Section III.D.f.; and Appendix B, II. Section 3.b.

**Question 9 (5/19/2021):**

Section VI.I. allows buses to be sold/traded in, but is this allowed to be done outside the non-attainment area, and with no impact to the TAG award?

**Answer:**

It is correct that existing equipment may be sold or traded in. However, existing equipment being replaced by equipment purchased by TAG funding needs to be either scrapped or removed from service in the nonattainment area (i.e., sold or traded in outside of the area). Section VI.I. primarily covers the equipment being purchased with a targeted airshed grant. This is generally a summary of the equipment requirements under 2 CFR 200.313. The statement at the end of this paragraph is related to how the equipment being purchased with the TAG funding can be replaced, which is consistent with 2 CFR 200.313(c)(ii)(4). The "replacement equipment" in this paragraph is the equipment to be purchased with TAG funding, while the "equipment to be replaced" is the equipment being replaced by TAG funding described in Section I.C.2.a. In this case, the proceeds of that sale or trade should reduce the costs charged to the TAG award for purchasing the replacement equipment.

**Question 10 (5/19/2021):**

Do replaced vehicles have to be either destroyed or removed from service in the applicable non-attainment area?

**Answer:**

Yes, this is correct. See Section I.C.2.a., top of page 8 of the RFA. However, see Section I.C.2.c. for demonstration projects only.

**Question 11 (5/19/2021):**

Could the grant recipient sell their replaced buses to an entity with routes outside of the non-attainment area? If so, is that entity allowed to keep the proceeds from the sale of the replaced bus without any impact on their TAG award?

**Answer:**

Yes, a grant recipient can sell their replaced buses to an entity with routes outside of the non-attainment area. This is consistent with Section I.C.2.a. of the RFA.

But no, that entity is not allowed to keep the proceeds from the sale of the replaced bus without any impact on their TAG award (see Question and Answer 9 above). The “replacement equipment” in Section VI.I. is the equipment to be purchased with TAG funding, while the “equipment to be replaced” is the equipment being replaced by TAG funding described in Section I.C.2.a. In this case, the proceeds of that sale or trade should reduce the costs charged to the TAG award for purchasing the replacement equipment. The agency applying for the TAG funding can include these anticipated proceeds as leveraged resources. See Section III.B. of the RFA for clarification on the differences between voluntary cost share and leveraged resources. This only applies to the grantee or subgrantee. The requirements of 2 CFR 200.313 would not apply if the replaced vehicle was replaced by a vehicle purchased through participant support costs. See Appendix C of the RFA for distinguishing between subawards, contracts, and participant support costs.

**Question 12 (5/19/2021):**

If two agencies under one airshed work together to submit grant proposals, with only one being eligible to apply based on Section III.A. of the RFA, can they each apply for their “maximum allowable number of applications” (Section I.B.) or must they meet that maximum together? For example, if two applications are allowable for their non-attainment area, can each agency submit 2 applications (4 applications total) or can they only submit a total of 2 applications?

**Answer:**

The limit applies to each eligible entity that can directly apply for a targeted airshed grant. Since only one agency is eligible to directly apply for a targeted airshed grant in this scenario, they must meet the maximum together if they decide to work together.

**Question 13 (5/19/2021):**

Is a demonstration project eligible?

**Answer:**

A demonstration project could potentially be eligible if the details of the project are consistent with Section I.C.2.c. on page 9 of the RFA. The main consideration is whether it will result in anticipated emission reductions that are quantifiable.

**Question 14 (5/20/2021):**

Could a TAG project deploy zero emission trucks with a rental/lease fleet?

**Answer:**

It depends. If existing vehicles are replaced, see Section I.C.2.a. of the RFA. If not, it would need to be a demonstration project that meets the description under Section I.C.2.c. of the RFA. Also, for this type of project, be sure to read Appendix C for clarification on subawards, contracts, and participant support costs.

**Question 15 (5/21/2021):**

For vehicle replacement projects, are leased vehicles eligible? If so, will there be any difference in quantification of environmental benefits or cost-effectiveness?

**Answer:**

It is possible for this to be eligible. They will need to be replacing existing vehicles (see Section I.C.2.a. of the RFA), or it would need to be a demonstration project that meets the description under Section I.C.2.c. of the RFA. Also, for this type of project, be sure to read Appendix C for clarification on subawards, contracts, and participant support costs. The calculations would be similar but be sure to follow the instructions in Section I.D.2. through 4.

**Question 16 (5/21/2021):**

Can independent companies apply for TAG?

**Answer:**

Only air pollution agencies with a SIP that covers one of the listed nonattainment areas and have an existing Clean Air Act program grant, can apply directly for target airshed grants (see Section III.A. on page 15 of the RFA). However, entities that are ineligible to directly apply for these grants can partner with one of the eligible agencies as part of one of their applications. These agencies can provide funding to other entities through subawards, contracts, or participant support costs. See Appendix C of the RFA for clarification on the differences between these mechanisms.

**Question 17 (5/26/2021):**

Can Targeted Airshed grants be used for air quality monitoring for Environmental Justice (EJ)?

**Answer:**

It depends on the overall project(s) included in the application. As noted under Section III.C.2. through 4 on page 17:

2. Applications must include projects with primary activities that directly reduce emissions from a given source.
3. Applications must include activities that address priority emission sources and emission-reducing activities that generate measurable reductions of ozone, PM<sub>2.5</sub>, and/or precursor air emissions in one or more of the designated nonattainment areas identified in the Summary section.
4. Applications must be for emission reduction activities and/or activities that will lead to emission reductions that will assist in complying with or maintaining the NAAQS for the applicable pollutant(s), and that demonstrate the potential for inclusion in the affected jurisdiction's SIP or TIP submission to EPA intended to meet those standards.

**Question 18 (5/26/2021):**

When evaluating Environmental Justice (EJ), is the impact of the applying entity on the nonattainment area through the project alone considered or will the applying entity's impact from contracting with other companies that have EJ efforts outside the nonattainment area be considered and evaluated as well?

**Answer:**

The EJ evaluation of this competition is primarily based on how the project(s) in the application benefit certain communities that have faced disproportionate and adverse environmental, human health, climate-related, and other cumulative impacts (see Section I.C.3., Section V.A.2., and Appendix B. II Section 2. of the RFA). Since the emission reduction activities must occur within the applicable nonattainment area (see page 17, Section III.D.1.b.), these community benefits should be within the nonattainment area.

**Question 19 (5/26/2021):**

Will an applicant receive points for addressing additional pollutants such as NO<sub>x</sub>?

**Answer:**

Applications will be evaluated primarily for pollutants contributing to the nonattainment area. So, if NO<sub>x</sub> is one of the pollutants contributing to nonattainment in the region, then the ways that the projects plan to address it will be considered while determining points.

**Question 20 (5/26/2021):**

Are projects that include optional standards that are lower than the latest standards eligible? For example, can an engine certified to the optional low NO<sub>x</sub> standard of 0.02 g/bhp-hr be eligible when the federal standard is 0.2 g/bhp-hr?

**Answer:**

Yes, a lower emission standard is allowable. This is on the top of page 7 of the RFA: "Emission reduction activities must meet or exceed the latest emissions standards for the respective pollutant(s). If no federal or state standard for the proposed activity exists, the applicant should propose the most stringent, least polluting option."

**Question 21 (5/26/2021):**

What should communities that are not included in EPA's EJSCREEN do to be able to provide data to address Environmental Justice (EJ) issues?

**Answer:**

EJSCREEN or a similar tool is recommended but not required when providing data to address EJ. If other reliable data or sources meet the descriptors in Section I.C.3 at the top of page 10 of the RFA, then those can be used.

**Question 22 (5/26/2021):**

With direct, measurable, emission reductions now emphasized as a requirement, does this mean we can no longer include efforts to protect public health (such as providing air filters to communities in the airshed) in our application?

**Answer:**

This can be included as part of a broader project, but not as the primary project of an application. As noted at the top of page 17 under Section III.C.2., "Applications must include projects with primary activities that directly reduce emissions from a given source."

**Question 23 (5/27/2021)**

Can an organization who is not one of the top five most polluted nonattainment areas still apply with this grant program?

**Answer:**

No. The top 5 limit is due to the annual State and Tribal Assistance Grants (STAG) appropriations language that authorizes this grant program. Below is the language from the 2021 Consolidated Appropriations Act (relevant sentences highlighted), which is what EPA has to follow for this year's competition.

Targeted Airshed Grants: "\$59,000,000 shall be for targeted airshed grants in accordance with the terms and conditions in the explanatory statement"

Explanatory Statement: "The agreement provides \$59,000,000. These grants shall be distributed on a competitive basis to nonattainment areas that the Agency determines are ranked as the top five most polluted areas relative to annual ozone or particulate matter 2.5 standards, as well as the top five areas based on the 24-hour particulate matter 2.5 standard where the design values exceed the 35 mg/m<sup>3</sup> standard. To determine these areas, the Agency shall use the most recent design values calculated from validated air quality data. The Committees note that these funds are available for emission reduction activities deemed necessary for compliance with national ambient air quality standards and included in a State Implementation Plan submitted to the Agency. Not later than the end of fiscal year 2021, the Agency should provide a report to the Committees that includes a table showing how fiscal year 2019 and 2020 funds were allocated. The table should also include grant recipients and metrics for anticipated or actual results."

**Question 24 (6/01/2021):**

If two air districts cover one nonattainment area, can either air district submit an application for that area?

**Answer:**

In order for activities to be eligible under the application, the activities need to be in an area where the air district has responsibilities under a SIP (See Section III.A. Eligible Entities). Mobile projects can go outside of the applicable area, but they need to operate a majority of the time in the applicable area (See Section III.D.b. on page 17). If the above is the case, then either air district can apply for the activity, and if needed, subaward any work that needs to be carried out by the other air district.

**Question 25 (6/01/2021):**

Will there be a 2020 TAG RFA?

**Answer:**

The President requested targeted airshed funding in his 2022 budget request, and we are hopeful EPA will receive targeted airshed funding again in 2022. However, TAG is always authorized by Congress through EPA's annual STAG appropriation. As such, there is no guarantee that Congress will continue to fund it, but they have included TAG in our STAG appropriation every year since 2015. Another thing to keep in mind is that the typical language authorizes this program only for the 5 most polluted ozone and PM<sub>2.5</sub> nonattainment areas based on the most recent design values. We always use the current design value lists at the time we post that year's competition (<https://www.epa.gov/air-trends/air-quality-design-values>, the 2019 design value reports were the current ones at the time of this year's competition). The eligibility section of the RFA on page 15 also explains who is eligible.

**Question 26 (6/04/2021)**

Can you provide any grant applications submitted in response to the 2018 targeted airsheds competition?

**Answer:** You would need to submit a Freedom of Information Act Request to request grant applications from prior grant competitions. See <https://www.epa.gov/foia> for information on EPA's FOIA process.

## **GENERAL QUESTIONS AND ANSWERS**

**Question G1:**

Where can I find information about grants awarded under past Targeted Airshed Grant (TAG) competitions?

**Answer:**

A list of targeted airshed grants awarded between 2015-2020 are available on the [TAG Program web page](#).

**Question G2:**

If we have a diesel truck replacement project funded by DERA and working with one equipment manufacturer, is it possible to submit a targeted airshed application with a different company as a complementary project?

**Answer:**

Yes, that could be allowable, depending on the details of the two projects. Basically, if they are two distinct projects, then it could be allowable. TAG has no requirements or limits on the manufacturers. See Section I.C.1 page 7 of the RFA about projects that may not include activities funded by a previous EPA grant or cooperative agreement.

**Question G3:**

Can the TAG funds be co-mingled with other EPA, another federal agency, and/or non-federal (e.g., state) grant funding sources as a voluntary cost-share or leveraged funding?

**Answer:**

Targeted airshed grants cannot be co-mingled with other EPA grant funds to create a [Performance Partnership Grant](#). Other federal funding can be used to meet proposed voluntary cost share only if the statute authorizing the other federal funding provides that the federal funds may be used to meet a cost share requirement on a federal grant or cooperative agreement (see Section III.B.1., page 15 and Appendix B – Section 5, page 39 of the RFA). Proposed leveraged resources can include other relevant federal funding beyond those authorized to be used for cost share on another assistance agreement. Air pollution control agencies can use non-federal funding for voluntary cost share or leveraging.

Projects can complement but cannot replicate activities funded under another federal assistance agreement(s) (see Section I.C.1., second bullet point on page 7 of the RFA).



Questions and Answers for FY 2021 Targeted Airsheds RFA  
6/4/2021

**Question G4:**

Do Buy American requirements apply to targeted airshed grants?

**Answer:**

No, Buy American does not apply to the targeted airshed grant program.

**Question G5:**

Can a single application feature more than one project or activity? If the answer is yes, then, can a nonattainment area with a maximum number of applications equal to two submit one application with two distinct projects and also submit its second application with another two or even more distinct applications, given that neither application is for a grant in excess of \$8,000,000?

**Answer:**

Yes, that may be allowed if the projects are different among multiple applications. See Section III.D.2.d. on page 18 of the RFA.

**Question G6:**

Are we limited to the attachments specified in the RFA, or can we add other attachments?

**Answer:**

Appendix B of the RFA details the required forms for applications. You can also include additional attachments using the "Other Attachments" form in Grants.gov. A list of some optional attachments is included in Appendix B, Section 5 on pages 46-47 of the RFA. However, applicants cannot use "Other Attachments" to address components of the project narrative to avoid the project narrative's page limit, except where noted in Appendix B.

**Question G7:**

Is there a minimum warranty requirement for the equipment in the project proposal?

**Answer:**

There are no minimum warranty requirements for equipment included in the TAG RFA.

**Question G8:**

If some voluntary cost share or leveraged funds are provided by a project partner and not the applicant, does the applicant need to provide a support letter indicating the cost-share and amount with the application?

**Answer:**

Yes, the Voluntary Cost Share Commitment Letter is needed for commitments from entities other than the applicant; see Section IV.C.5. on page 20 and the Appendix, Section 6 on page 46 of the RFA.