

Fiscal Year 2019 Frequently Asked Questions for CERCLA 128(a) Funding Guidance for the New Small Technical Assistance Grants

EPA prepared these Frequently Asked Questions (FAQs) and answers to assist current CERCLA 128(a) recipients to determine if they are proposing an eligible activity under the new Small Technical Assistance Grant Program under CERCLA 128(a). Please review Appendix A of the FY19 CERCLA 128(a) Funding Guidance for more information about this new grant program. The questions identified in this document were asked during the OBLR hosted webinars on 10/23/18 and 11/1/18 on this new grant program.

The FAQs will be updated periodically as we continue to receive questions.

1. What is the award period for the new Small Technical Assistance Grants for FY 2019?

The award period for the Small Technical Assistance Grants will match your CERCLA 128(a) grant award period. For many recipients, that means the award period will be October 1, 2019 through September 30, 2020. However, some CERCLA 128(a) grantees have a different award period and this new grant will match that award period.

2. What is the total amount available for this new Small Technical Assistance Grants for FY 2019?

The new grant program is limited to \$20,000 by statute. For FY 2019, each state, tribe, or tribal consortia currently receiving CERCLA 128(a) funds is limited to applying for one new Small Technical Assistance Grant for a maximum of \$20,000.

3. Can an eligible entity address multiple entities under on Small Technical Assistance Grant?

Yes, an eligible entity can address multiple communities in one award but each community benefiting needs to meet the statutorily defined communities eligible to benefit from this grant funding (Small or Disadvantaged).

4. Are site-specific activities, such as assessment and cleanup activities, eligible under the Small Technical Assistance Grant?

No, site specific activities, including environmental site-assessments, the development of an Analysis for Brownfields Cleanup Alternatives (ABCA), cleanup planning or cleanup activities on a specific brownfield site are not eligible under the Small Technical Assistance Grant.

5. Can a state or tribe hire a contractor to conduct eligible activities (e.g., planning for a community)?

Yes, a contractor may be procured to conduct eligible activities under the Small Technical Assistance Grant. If a state or tribe already has a contractor in place, they may be able to use them for this new grant if all procurement rules are followed, and it can reasonably be inferred from the solicitation that the tasks contemplated by this project would be done under that contract.

6. Can an application be submitted for successive years for the same community?

No, all proposed projects need to be completed within 12 months. The expectation is that if the same CERCLA 128(a) entity requests these grant funds next year, then another community will be supported by the grant the following year.

7. Is travel an eligible cost under the Small Technical Assistance Grants?

Yes, travel is an eligible expense. However, remember that the total grant amount is \$20,000 and need to demonstrate why travel is critical to the success of the project.

8. How much detail is expected for the request?

Appendix A of the FY 2019 CERCLA 128(a) Funding Guidance explains the information that needs to be included in the two-page grant funding request.

9. Who is eligible to apply for the new Small Technical Assistance Grants?

Current 128(a) grantees in good standing are eligible to apply for the Small Technical Assistance Grant program.

10. How should the state or tribe define the community?

To be eligible, the community needs to meet the BUILD Act statutory definitions of small community or disadvantaged community. If the most recent decennial census data is not available to meet one of these definitions, it is acceptable to use the American Community Survey.

11. Can the grant funds be used to provide technical program improvement to the state or tribal response program?

No, the purpose of this grant is for a state or tribe to provide technical assistance support to a small or disadvantaged community needing help with brownfields. The grant funds cannot be used to improve a state or tribal response program.

12. Is helping a community create an inventory of brownfields sites an eligible activity?

Yes, helping a small or disadvantaged community develop an inventory of brownfields sites is an eligible activity.

13. Can a state or tribe use the grant funds to develop a general Quality Assurance Project Plan (QAPP)?

No, the development of a general Quality Assurance Project Plan (QAPP) is not an eligible activity under the Small Technical Assistance Grants.

14. Are a participant's costs to enroll in a state voluntary cleanup program eligible?

No, a participant's costs to enroll in a state voluntary cleanup program or tribal response program are not eligible activities under the Small Technical Assistance Grants.

15. Can a state or tribe charge their indirect rate to the new Small Technical Assistance Grants?

Yes, a state or tribe can charge their indirect rate to the Small Technical Assistance Grants. However, the indirect rate must be included in the statutory limit of \$20,000.

16. Is Health Monitoring an eligible cost under the new Small Technical Assistance Grant?

No, the Small Technical Assistance Grant cannot be used to implement health monitoring. However, recipients could provide small or disadvantaged communities with technical assistance to develop a health monitoring plan to facilitate the assessment of health risks at brownfields sites as well as training on how to effectively carry out the plan.

17. Are conducting land surveys or creating topographical maps eligible under the new Small Technical Assistance Grant?

Yes, costs for a land survey that is necessary to conduct a research project may be eligible under the new Small Technical Assistance Grants. Similarly, if an output of a research project for a small or disadvantaged community is a topographical map then the costs for preparing the map would be eligible under the statute. States and tribes could also provide training and technical assistance to other individuals and organizations on how to conduct a land survey and prepare a topographical map.