

North Texas Clean Diesel Project 2021 Call for Projects



Frequently Asked Questions Updated November 1, 2021

- Q: Due to mitigating circumstances, a current vehicle our fleet was seeking to retire did not accumulate the required 7,000 miles during each 12-month period for the last 24 months. Is there a waiver available that would still enable us to replace this vehicle?
- A: No, EPA cannot grant waivers under these circumstances. However, per page 18 of the 2020 DERA RFA (at https://www.epa.gov/sites/default/files/2020-02/documents/2020-dera-national-grants-competition-final-amend-02-04-2020.pdf), "Vehicle mileage may be combined to reach the thresholds below where two vehicles will be scrapped and replaced with a single vehicle." An option is available to combine two current vehicles for a combined mileage amount and replace those two vehicles with one newer qualifying vehicle.
- Q: Can I combine Texas Volkswagen Environmental Mitigation Program funds with grant funds from this opportunity?
- A: No; combining these funds is not allowed due to different emissions reductions implications of the two funding programs.
- Q: On the application, why does NCTCOG require mileage/hours or fuel?
- A: NCTCOG prefers both fields but requires either 1) mileage/hours for vehicles or equipment, respectively, or 2) fuel usage to accurately compute cost per ton of NO_X reduced. Providing one of the fields will allow staff to estimate the other field in order to calculate emissions benefits.
- Q: On the application, what is the difference between default and actual values for mileage/hours or fuel, and how will it affect the grant award?
- A: Default values do not accurately reflect the organization's real-world usage, especially if the activity idles longer because of its vocation or has a power takeoff unit. The emissions benefits contribute to 75 percent of the total project score, which is further defined under "Selection Criteria" in the Guidelines document.
- Q: Are locomotive idle reduction technologies eligible for funding?
- A: Yes. The eligible technologies include locomotive shore power installation and shore connection systems. Technologies used must be on the EPA SmartWay verified list, which for locomotive idle reduction technologies is located at https://www.epa.gov/verified-diesel-

<u>tech/smartway-verified-list-idling-reduction-technologies-</u> irts-locomotives.

Q: What are considered eligible costs of a replacement vehicle/equipment?

A: Eligible costs include the cost of modifications, attachments, accessories, or auxiliary apparatus necessary to make the equipment functional. For example, air conditioning on a school bus replacement would be considered an eligible cost. However, sledgehammers for a firetruck replacement would not be considered an eligible cost.

Q: Are vehicles eligible for funding if the organization has already ordered them?

A: No. Reimbursable activities may not start until after there is an executed agreement between the Rebate recipient and NCTCOG.

Q: How do I find the engine family code?

A: The engine family code (name) is a 12-character number/letter designation that can be found on the engine nameplate. A good resource to finding the engine family name is https://www.epa.gov/importing-vehicles-and-engines/locating-vehicle-emissions-label.

Q: Are only near-zero emissions engines eligible for the 35 percent funding level or are all CARB low-NOx engines eligible for the 35 percent funding level?

A: All CARB certified low-NOx engines are eligible for the 35 percent funding level. Currently, CARB has established three optional low NOx emissions standards: 0.1 g/bhp-hr, 0.05 g/bhp-hr and 0.02 g/bhp-hr. Vehicles/equipment powered by an engine that is CARB certified to these three optional low NOx emissions standards are eligible for the 35 percent funding level. The 0.02 g/bhp-hr standard is often referred to as near-zero. See https://ww2.arb.ca.gov/sites/default/files/classic//msprog/onroad/optionnox/optional_low_nox_certified_hd_engines.pdf.

Q: What does disposition mean and what are disposition requirements?

A: In general, disposition is rendering a vehicle and engine permanently inoperable by cutting the rails of the chassis completely through and cutting or punching a 3"x3" hole in the engine block. Please refer to the Disposition section of the Guidelines document for the NTCDP 2021 Call for Projects for all disposition details (www.nctcog.org/agfunding).

Q: Are repowers eligible for funding in this Call for Projects?

A: No, only replacement projects are eligible for funding in the North Texas Clean Diesel Project 2021 Call for Projects.

Q: What heavy-duty vehicles are available that utilize CARB low-NO_X engines or electric motors?

A: A list has been posted on the Call for Projects website, which can be accessed from https://ww2.arb.ca.gov/sites/default/files/classic//msprog/onroad/optionnox/optional_low_nox_certified_hd_engines.pdf.

- Q: The organization has a retirement schedule for the fleet but does not follow it, so replacements are not considered scheduled retirement. How can the organization determine if a replacement is an early retirement?
- A: If the organization has a retirement schedule, and abides by it, NCTCOG will evaluate the proposed project based on the early retirement discussion in the Guidelines and per the organization's retirement schedule. If the organization does not follow a retirement schedule, staff will evaluate your proposed project based on justification provided by the organization on why the replacement is not a scheduled retirement.
- Q: Does the organization need to submit a copy of the quote for the new vehicle/equipment with the application?
- A: Yes, per the Guidelines at least one price quote for each project type is required at time of application and will be the basis for determining the maximum rebate award amount based on applicable funding thresholds.
- Q: The organization's equipment operates for 500 hours each year but not all those hours are in the nonattainment area. Is the project still eligible for funding?
- A: Yes, if the equipment operates for at least 500 hours per year and it operates in the nonattainment area at least 51 percent of the time, it is eligible. However, for competitive evaluation, NCTCOG will evaluate cost per ton based only on the hours used in the nonattainment area.
- Q: Is there a limit on how many activities can be included in the application?
- A: No. NCTCOG reserves the right to award funding to all, some, or only one of the activities requested.
- Q: Can the organization implement fewer activities than the number of activities granted under an award?
- A: Yes.
- Q: In the online Risk Assessment, why is the congressional district requested?

A: The congressional district is requested because it is reported on some grants. Any awards of more than \$30,000 must be included in NCTCOG's and in the Federal Funding Accountability and Transparency Act (FFATA) reporting, which requires a congressional district for each subrecipient. In addition, as part of EPA's reports to Congress on the Clean Diesel Funding Assistance Program, the amount of funds spent in the various congressional districts shows whose constituents benefit from the funds. NCTCOG can look up the district by address if the organization only uses one address.

Q: Is there a special insurance requirement for a grant-funded vehicle?

A: Per Article 8, Section 8.1 of the template Agreement, each grant-funded vehicle/equipment is required to have enough property insurance for the repair or replacement of the vehicle.

Q: Is a company eligible for funding if its boundary is partly in the nonattainment area and partly out of the nonattainment area?

A: Eligibility is based upon the geographic area in which the vehicle/equipment to be replaced operates. If the requested project is to replace an eligible vehicle/equipment that operates primarily in the nonattainment area (that is, the routes are in the nonattainment area), and the newly purchased vehicle/equipment will stay on the same routes, then yes, it is eligible.

Q: What is the difference between gross vehicle weight rating (GVWR) and gross vehicle weight (GVW) for a vehicle or equipment?

A: The gross vehicle weight rating is the maximum weight rating established by the chassis manufacturer, whereas the gross vehicle weight is the total weight of the vehicle (or equipment) and payload at a point in time. GVWR information is needed only for on-road (not nonroad) type projects.

Q: What is the final date an order must be placed?

A: Projects must be completed no later than January 2024 which includes, new vehicle purchase completed, old vehicle disposition completed, new vehicle in service at the facility and final reimbursement document submitted to NCTCOG.

Q: What is the minimum cost/ton of NOx emission reduced to be considered competitive?

A: Competitiveness will depend on the number of eligible projects submitted in each round and available funding.

Q: If the company is nationwide, would the Risk Assessment be filled out for the entire company or the local branch that is applying for funding?

A: The risk assessment would be for the whole company. In most cases, the main entity sets the policy and oversees any local/branch operation. The financials for the branch are included in the overall agency financials. These are also the people who will be the responsible party in the agreement.

The only business exception to this is for privately owned franchises. In the case of a franchise, it is a privately owned business and would be considered separate from the parent organization. The parent corporation would maintain the brand but the individually owned business would be responsible for their ultimate success or failure. Neither success or failure would reflect on the parent organization.

Q: If the company is nationwide, would the Clean Fleet Policy need to be applicable to the entire company or the local branch applying for funding?

A: The policy would need to be adopted by the entire fleet. However, it has been our experience that nationwide private companies typically have their own policy that applies to their entire fleet which we would then accept the fleet's policy as having satisfied the Clean Fleet Policy requirement.

Q: For the NTCDP grant, can a fleet use a conventional purchase loan for the purchase of the new zero-emission vehicle?

A: No, since the guidelines specifically state with cash on hand (not financed), financing with a conventional loan would not be in compliance with the guidelines provided by NCTCOG.

Q: Would NCTCOG consider funding the replacement of a newer vehicle than 2009 (in this case, a 2013) with a zero-emission vehicle?

A: Yes, based on EPA 2020 RFA, pg. 11. Please see the chart below:

Table 2: Medium and Heavy-Duty Truck, Transit Bus, and School Bus Project Eligibility

Current Engine Model Year (EMY)	DOC +/- CCV	DPF	SCR	Verified Idle Reduction, Tires, or Aero- dynamics	Vehicle or Engine Replacement: EMY 2018+ (2014+ for Drayage)	Vehicle or Engine Replacement: EMY 2018+ Zero Emission ² or Low-NOx ³	Clean Alternative Fuel Conversion
older - 2006	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2007 - 2009	No	No	Yes	Yes ¹	Yes	Yes	Yes
2010 - newer	No	No	No	Yes ¹	No	Yes	Yes

- Q: Would NCTCOG consider a three-way swap for the program? The applicant would receive a zero-emission vehicle. The applicant would give their 2010-2016 vehicle to another entity. That entity would then scrap a 1996-2009 vehicle.
- A: Yes, but the scenarios require approval on a case-by-case basis, from NCTCOG and possibly EPA as well. This will require a detailed scrappage plan for review and approval. (From the EPA 2020 RFA, pg. 33):

"If a 2010 engine model year (EMY) or newer vehicle is replaced, the 2010 EMY or newer vehicle may be retained or sold if the 2010 EMY or newer vehicle will replace an 1996-2009 EMY vehicle, and the 1996-2009 EMY vehicle will be scrapped. It is preferred that the scrapped unit currently operates within the same project location(s) as the 2010 EMY or newer vehicle currently operates, however alternative scenarios will be considered. The term "project location" as used in this RFA refers to the primary area where the affected vehicles/engines operate, or the primary area where the emissions benefits of the project will be realized. All existing and replacement vehicles are subject to the funding restrictions in this section of the RFA. All equipment must operate within the United States. Under this scenario, a detailed scrappage plan must be submitted and will require prior EPA approval."

Q: Could a lease be funded?

A: The new vehicles and/or equipment must be purchased to own with no leasing.

Q: Can a current on-road vehicle be replaced with a lighter Gross Vehicle Weight Rating (GVWR) vehicle; i.e. a 33,000 pound GVWR truck be replaced with a 26,000 pound GVWR truck?

A: Yes – a long as the current and replacement on-road vehicle GVWR designations are within the same vehicle class.

(From the EPA 2020 RFA, page; 33):

"Highway: The replacement vehicle must not be in a larger weight class than the existing vehicle (Class 5, 6, 7, or 8). The engine's primary intended service class must match the vehicle's weight class (i.e. a LHD diesel engine is used in a vehicle with GVWR 16,001-19,500 pounds, a MHD diesel engine is used in a vehicle with a GVWR of 19,501-33,000 pounds, and an HHD diesel engine is used in a vehicle with a GVWR greater than 33,000 pounds.) Exceptions may be granted for vocational purposes, however the GVWR must stay within 10 percent of the engine's intended service class and any exceptions will require specific EPA approval prior to purchase."