

Wildfire Exceptional Event Demonstrations for Ground-Level Ozone in the Great Lakes Region

Response to Comments

Q1. The time between proposal submission (Nov 2) and an expected contract (Nov 6) seems very short. Is there draft contract language that we can review before submitting a proposal to help meet this schedule?

A1. The [LADCO Procurement Manual](#) has LADCO boiler plate contract terms and conditions.

Q2. Have any preparatory studies for these demonstrations been performed?

A2. LADCO has looked at different events going into the 2020 design values but not all of the possibilities. The intent of Task 2 is to conduct a comprehensive analysis that looks across all dates in the 2018-2020 period for the four nonattainment regions that we're interested in.

Q3. Does LADCO know which Tier of evidence will likely be needed for each exceptional event demonstration (i.e., Tier I, Tier II, or Tier III)?

A3. We don't know which tier will be needed. We're asking the contractor to use their experience with EE demonstrations along with considerations of the data for the 2018-2020 period to advise LADCO on the best path to approvable demonstrations for each of the four nontattainment regions listed in the RFP.

Q4. Should proposers submit cost proposals for each potential Tier of demonstration for each location? That is, for Task 3, should we submit three cost estimates for a Tier I, Tier II, and Tier III type demonstration?

A4. If you feel that this is the best way to respond to this RFP to cover the different possibilities of scope and workload for each task, then yes. But this approach is not a requirement of the responses to the RFP.

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Q5. What is the anticipated available budget for these demonstrations?

A5. We don't have an anticipated budget. Please estimate your scope, timing, and budget to reflect how to complete the tasks in the RFP.

Q6. On Task 3, the December 15 deadline seems ambitious given that part of Task 3 is to respond to public comments from the 30-day public comment period. Are these dates to be interpreted as the date the draft EE demonstration reports are due? What is the expected date of completion for the final report for Task 3? Can these dates also be provided for Tasks 4-6?

A6. You are correct, the dates can be interpreted as the due date for the draft demonstration report. Assume that the 30-day public comment period would happen after receipt of the exceptional event demonstration documents by LADCO. Assume the final report will be due 45 days after the date listed for each task in the RFP.

Tasks 4-6 have dates for the draft report of February 28, 2021. Also assume the final report will be due 45 days after the date listed for each task in the RFP.

Q7. (RFP, p. 3) LADCO indicates that it conducted a screening analysis in which it identified regulatory significant ozone episodes in NAAs across the region during the 2018-2020 period where wildfire smoke may have had an impact on the ozone concentrations. Will that list of episodes and impacted monitors be shared with prospective bidders prior to the proposal deadline?

A7. No. We expect under Task 2 that the contractor will look across all of days contributing to the 2020 design values at the areas covered by the RFP and provide an analysis to LADCO on the regulatory significance of wildfire smoke events in the record. Although we have an internal process for identifying regulatory significance, we're interested in alternative perspectives that may identify blind spots in our internal analysis.

Q8. (RFP, p. 4) LADCO states that analyses for this project will focus on dates that have regulatory significance for 2020 ozone design values for the listed NAAs. In its screening analysis, did LADCO determine that there were explicitly reviewed dates and events that failed to meet the regulatory significance for an exceptional events demonstration and should not be pursued? Will a list of those events and associated dates be shared with prospective bidders prior to the proposal deadline?

A8. We do not have a list of dates that should not be pursued. However, in the analysis for task 2 the contractor is expected to identify if there are smoke events that have

regulatory significance for ozone NAAQS attainment. The results from this analysis will likely also identify events to exclude based on a lack of regulatory significance.

- Q9. EPA Regional office review at times can be uncertain based on individual reviewer experience. Oftentimes it is difficult to predict what could be requested in this review. We also cannot find evidence that Region 5 has experience reviewing any exceptional events demonstration requests to date. As we want to assure that we adequately propose to cover the costs and meet the agency's needs under a fixed price contract, has LADCO or any of the represented states reached out to Region 5 EPA to determine what reviewers of the proposed exceptional events demonstrations will be considering in their review?
- A9. In October 2017 EPA Region 5 reviewed the [OH EPA demonstration for the Ft. McMurray fire](#). LADCO has not had any discussions with EPA Region 5 about what they will be considering in their review, but we expect that the August 2019 Wildfire Exceptional Events guidance associated with the final 2016 rule be used as a guide to determine what EPA expects when reviewing these demonstrations.
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- Q10. The solicitation calls for a fixed price contract. We are concerned that EPA may require additional analyses during their review that may be outside the currently anticipated scope of work. Will additional resources be available in such a case?
- A10. It is possible that additional funds could be available if the scope of the project needs to be expanded.
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- Q11. Work conducted independently on behalf of an industrial stakeholder in the LADCO region has already investigated the impact of wildfire smoke on the region during the period of interest. Would LADCO consider utilizing the factual information compiled, formatted, and presented under this stakeholder contract for purposes of expediting delivery of preliminary results and offsetting the cost of our proposal or would that be considered by LADCO as a potential or perceived conflict of interest?
- A11. The work presented for this project must be based on rigorous and transparent scientific methods and publicly-available data. While we do not take issue with a contractor leveraging existing work to create efficiencies for LADCO-funded projects, we would expect a full disclosure of the origins of pre-existing information that are brought forth for use in our projects.
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- Q12. (LADCO Procurement Manual, Section II) Section E. Limitations on Consultant

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Compensation states that LADCO will not reimburse individual consultants on an hourly, daily or other basis that has the effect of exceeding the amount paid to Federal employees at Level IV of the Executive Schedule. At this time, the Level IV compensation rate (see <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/EX.pdf>) appears to be \$170,800 annual, which is approximately \$82/hour. Will LADCO be using this firm rate cap to evaluate proposed bidder qualifications or will it consider higher compensation rates in awarding the work?

A12. We will consider higher compensation rates. Note that total cost is one of the scoring criterion used to evaluate the proposals.

Q13. Can the deadline for the deliverables for Task 2 and Task 3 be extended by two to four weeks?

A13. While we prefer to use the project schedule outlined in the RFP, we understand that it's an aggressive schedule. Contractors should propose a timeline that best estimates their ability to deliver sound technical information to support each task.