EO 13101 Quarterly Teleconference

Proposed Revised DEAR, Proposed Exemption Justification Form, and Sustainable Products

Teleconference Workshop on Greening the Government
through Waste Prevention, Recycling, and Federal Acquisition
March 1, 2001, 11 a.m.- 12:30 p.m. Eastern Standard Time

PARTICIPANTS:
ALBUQUERQUE OPERATIONS OFFICE:
LANL: Eleanor Chapman, Jim Stanton, Velma Dominguez
Sandia/NM: Kristin Klossner, Stacy Richardson
KCP: Bill Marks (Honeywell FM&T), Carolyn Lucas (Honeywell, FM&T)

CHICAGO OPERATIONS OFFICE: Tony Bindokas, Fred Sienko
Ames: Jack Cummings

DENVER REGIONAL OFFICE: Evelyn Matthews

FOSSIL ENERGY:
NETL: Bruce Webster, Randy Cooper
Strategic Petroleum Reserves: Katherine Batiste, Joyce Francois, Teresa Heaton

GOLDEN FIELD OFFICE:
NREL: Don Carlile, Jim McDermott

HEADQUARTERS: Susan Weber, Richard Langston, Michael Raizen, Mark Huffman (SAIC), Connie Haga (SAIC)
Yucca Mountain Characterization Project: Kathy Clemenson

IDAHO OPERATIONS OFFICE: Linda Hallum
Idaho National Engineering and Environmental Laboratory: David Janke, Mary-Ann Somsen

NAVAL REACTOR SITES:
Schenectady: Steve Therrien

NEVADA OPERATIONS OFFICE: Carol Shelton

OAKLAND OPERATIONS OFFICE:
LBNL: Shelley Worsham
LLNL: Kent Wilson,Tom Miller
SLAC: Pamela Wright-Brunache, Rich Cellamare

OAK RIDGE OPERATIONS OFFICE: Susan Phillips
TJNAF: Linda Even, Danny Lloyd, Dennis Dobbins
ORNL: David Wasserman
ORAU: Erskine Gray

OHIO FIELD OFFICE: Linda
Fernald: Pete Yerace

RICHLAND OPERATIONS OFFICE: Anna Beard, Pete Rasmussen, Theresa Aldridge
PNNL: Sandra Cannon (EO 13101 Coordinator), Kathy Kindall, Susan Thelen, Chris Armstrong, TR Hensyel, Steve Burnett
Fluor Daniel: Robert Moore, Dave Nichols, Ed Foss, Becky Rulon
Bechtel: Donnell Long
DynCorp: Kathy Hinkelman

SAVANNAH RIVER SITE: David Hepner & Westinghouse staff

POWER ADMINISTRATIONS:
Western Area: Gene Iley, Frank Armstrong, Ken Mathias

OFEE/EPA: Dana Arnold

11:10 Greeting and introductions - Susan Weber, DOE-HQ EO 13101 Manager

Susan Weber, the Headquarters Program Manager for DOE=s Sanitary Waste Reduction, Recycling, and Environmentally Preferable Purchasing Program, began the discussion. Susan mentioned that this teleconference was originally scheduled for last Thursday (February 22), but had to be rescheduled because a public hearing for the Defense Nuclear Facilities Safety Board exceeded its teleconference time limit.

Susan Weber noted that the Fiscal Year (FY) 2000 Executive Order 13101/Resource Conservation and Recovery Act (EO 13101/RCRA) Report just went into the mail. The Report indicated a modest improvement in FY 2000, compared to FY 1999. DOE=s purchase of the EPA-designated items increased from 60 percent in FY 1999 to 66 percent in FY 2000. After adjustments to the total purchases for exemptions (i.e., taking out purchases of products with virgin content where the items were not available competitively, at a reasonable cost, or did not meet performance standards), the percentage for FY 2000 goes up to 86 percent. In FY 1999, this adjusted percentage was 85 percent.

Susan thanked Mark Huffman (SAIC) for posting the FY 2000 Complex-wide and site-specific data on the Web site. Data for 1997 through 1999 is also posted on the Web site, so sites can check their progress and compare it to other sites.

Susan expressed concern that in FY 2000, DOE claimed exemptions for 20 percent of its virgin purchases of the EPA-designated items. DOE needs to be able to support its exemptions, if audited by the EPA or the Inspector General. This issue is one of the topics for today=s call.

Susan also said that she and Richard Langston (HQ) will do training in April for the Albuquerque sites, on Buying Green Requirements, along with Alison Thomas of DOE=s Federal Energy Management Program. This training will deal with the AWhy≅ and AWhat≅ aspects of Green Purchasing. Sandra Cannon (PNNL) has developed a AHow-To≅ training package designed to be a follow-up to the initial training. She is available to provide this training in person for about five DOE sites this Fiscal Year.

11:15 Subcontractor flow down clause and other revisions in the proposed Department of Energy Acquisition Regulations (DEAR) - Richard Langston, DOE-HQ Office of Procurement and Financial Assistance Policy

Richard Langston led the discussion. He announced and welcomed three new Green Acquisition Advocates (GAAs). Michael Raizen has replaced Beverley McCloskey as the Advocate for the Office of Headquarters Procurement Services. Linda Hallum has replaced Michael Adams as the Advocate for the Idaho Operations Office. Dennis Dobbins has been named as the Advocate at the Thomas Jefferson National Accelerator Facility. This is the first contractor operated facility to name an Advocate. This is not required, but contractor staff are encouraged to consider appointing advocates. One of Mr. Dobbin=s first efforts as Advocate was the distribution of a brochure promoting Green Acquisition and the Affirmative Procurement Program.

DOE is beginning to revise the Greening the Government Acquisition Letter to incorporate EO 13148, Environmental Leadership, and EO 13149, Fleet and Transportation Efficiency. EO 13148 includes a prohibition on the procurement of ozone depleting substances, and a requirement that the property management system be revised to include coordination with the Department of Defense, before any ozone depleting substances are removed from facilities or equipment. EO 13149 includes a ban on the purchase of virgin petroleum motor vehicle lubricating oil, if a re-refined product which meets the manufacturer=s oil specification requirements is available

DOE published a Notice of Proposed Rulemaking to amend the Department of Energy Acquisition Regulation to implement Executive Order 13101, on November 30, 2000. DOE proposed to add a new section 923.405, Procedures, to provide that the percentage of recycled content included in the EPA Recovered Materials Advisory Notice (RMAN) is to be specified in the solicitation, as the minimum recycled content.

DOE proposed to delete section 923.471, Policy, as unnecessarily duplicative of the Federal Acquisition Regulation (FAR) coverage at 23.403.

DOE proposed to add a new section 923.705, Contract clause, to supplement the FAR instruction concerning the clause at 52.223-10. It specifies that the clause is to be used in prime contracts for support services performed at Government-owned or Government-leased facilities, and in contracts for maintenance of a Government-owned or Government-leased facility.

DOE proposed a new section 936.601-3 to supplement FAR coverage regarding the preparation of Architect-Engineer (A-E) work statements.

DOE proposed to modify section 936.602-70 by the addition of a new paragraph (a)(8) regarding consideration of energy efficiency, pollution prevention, waste reduction, and the use of recovered materials when performing A-E selection evaluations.

DOE proposed to update section 970.2304 to include reference to 48 CFR (FAR) 23.4 and 23.7, and to add guidance concerning circumstances under which the clause at 970.5204-39 should be included in subcontracts.

DOE proposed to update the clause at 970.5204-39 to include reference to EO 13101 and the updated FAR coverage. DOE also proposed guidance concerning circumstances under which the clause should be included in subcontracts.

Comments were received from three DOE facility management contractors and one Federal agency. DOE=s planned responses to the comments and changes to be included in the final rule are discussed next.

These responses were developed by Richard Langston and Susan Weber (HQ). The responses have been cleared only with first level management. At this moment in the transition, all final rules will have to be cleared by the Secretary of Energy.

At 923.405, DOE had proposed an instruction stating that the AEnvironmental Protection Agency (EPA) recommended percentage of recovered/recycled content, contained in the Recovered Materials Advisory Notice (RMAN), should be specified in the solicitation, as the minimum percentage of recycled content.≅ One reviewer noted that this created a problem, as the EPA RMANs often do not specify a minimum content, but rather a range of content, as the content sometimes varies by geographic area. Richard and Susan responded to this comment by adding the phrase Aor range of content≅ at 923.405(e).

At 923.705, Contract clause, DOE had added a requirement to include the clause at FAR 52.223-10 in prime support service awards. A reviewer was not certain of the meaning of Aprime≅ when used in the phrase Aprime support service awards being performed at Government-owned or Government-leased facilities.≅ The same reviewer suggested the word Aawards≅ was unnecessary in the same phrase. DOE had intended that the word Aprime≅ limit Asupport service awards≅ to DOE awards as opposed to some other type of awards, such as subcontract awards. To clarify this intent, Richard and Susan have changed the phrase to read ADOE support service contracts.≅

DOE had proposed to extend the Affirmative Procurement Program to certain subcontracts. A reviewer suggested this would be contrary to other DOE efforts to implement more economical and efficient commercial procurement and subcontracting practices. The reviewer suggested this would require substantial cost to implement on the part of subcontractors, who would have to develop additional procedures, including an inspection program, to comply. The purpose of the rulemaking was not to flow down the Affirmative Procurement Program to all subcontractors. The purpose was only to capture those instances in which a facility management contractor subcontracts a significant portion of the operation of the Government facility, which involves the acquisition of items designated in EPA=s Comprehensive Procurement Guidelines that Federal agencies and their contractors are to acquire with recovered/recycled content. No inspection programs are mandated by this rulemaking. This comment was addressed by providing a circumstance under which the Facility Management Contractor can include an estimate of the subcontracted materials in its own report, and flow down only a requirement that the subcontractor furnish the materials with recycled content.

DOE had proposed amendments to the clause at 970.5204-39. The remaining comments all relate to the clause, or the instruction for its use at 970.2304-2. A reviewer questioned the title of the clause, which was proposed to change to AAffirmative Procurement Program.≅ It had previously been titled AAcquisition and Use of Environmentally Preferable Products and Services.≅ The change was proposed because AEnvironmentally Preferable≅ is the title of a separate EPA Program. AAffirmative Procurement Program≅ is the title used by the Resource Conservation and Recovery Act, 42 U.S.C. 6962, to describe a preference program for Federal acquisition of products with recovered/recycled content. The reviewer suggested DOE add Afor EPA Designated Products.≅ This suggestion has been adopted and a parenthetical A(Buy Recycled).≅ has been added. The title is now AAffirmative Procurement Program for EPA Designated Products (Buy Recycled).≅

Paragraph (a) of the clause advises the reader that the Department of Energy Affirmative Procurement

Program Guidance is available on the Internet. Two reviewers questioned the meaning of this. They were concerned that the Department might revise the guidance with no request for input. The guidance provided at the DOE Executive Order 13101 Home Page is extensive and includes Federal, EPA, and DOE regulatory materials, Executive Orders, strategic plans, and so forth. The portion which is considered the DOE Affirmative Procurement Program Guidance, for purposes of compliance with the clause at 970.5223-2, is entitled *DOE=s EO 12873 Affirmative Procurement Program Guidance*. It was developed after extensive coordination within the Department. Also included is *DOE=s E.O. 13101 Affirmative Procurement Program Draft 2000 Guidance*. The latter will be the operative guidance following completion of coordination, which includes coordination with the Department=s facility management contractors. Any future changes will be coordinated with affected contractors.

At paragraph (c), which requires reports, a reviewer suggested that the requirement for the submission of reports at the Aconclusion of each fiscal year≅ would be problematic for subcontracts in particular, and suggested that it be revised to read Aat the end of the Federal fiscal year and the end of the contract.≅ This suggestion has been adopted.

Paragraph (d) of the clause has the flow down requirement. A reviewer suggested that the facility management contractor be allowed to flow down a clause substantially the same as that at 970.5223-2. The reviewer felt that the circumstances under which flow down of the clause is appropriate may not be easily anticipated, and it might be easier to accomplish the intent of the instruction if it is possible to tailor the clause to the circumstances of the subcontract situation. This is acceptable and will be adopted. Additionally, the instruction is being revised to provide that in situations in which the facility management contractor can reasonably estimate the amount of products with recovered/recycled content, to be acquired under the subcontract, the facility management contractor may simply include such estimates in its own report, and only flow down an agreement that the subcontractor will procure such products with recovered/recycled content.

Paragraph (e) of the clause mentions the Recycling Coordinator. A reviewer questioned whether it was reasonable to expect that all facility management contractors have a recycling coordinator. The answer is affirmative, all DOE facility management contractors must have a recycling coordinator.

11:25 Discussion and questions on the DEAR

Sandra Cannon (PNNL) questioned whether the new clause title (AAffirmative Procurement Program for EPA Designated Products (Buy Recycled).≅) was appropriate given the requirements under EO 13123 and EO 13134 for the purchase of energy-efficient (EE) and biobased products. Sandra also said that EO 13101 mentions EE and biobased products in general terms only. How will the revised DEAR address this? Richard Langston (HQ) said that requirements for biobased products are mentioned in EO 13101, but that there are no requirements in the Executive Order or DEAR clause for the purchase of EE products. Richard will study the issue. [Note: A separate FAR Case 1999-011 has been working its way through the FAR system. It will add EO 13123 requirements to the FAR. DOE has implemented EO 13123 for the Federal Staff through Acquisition Letters 2000-003. There are no EE product reporting requirements, so DEAR implementation is not anticipated.]

Mary-Ann Somsen (INEEL) asked if EE and biobased products would be automatically covered by the clause, when EPA publishes Comprehensive Procurement Guidelines (CPGs) for the items. Dana Arnold (OFEE/EPA) said that CPGs are published only for recovered content items. In general, this would not include EE or biobased products. Under EO 13101, the US Department of Agriculture (USDA) will come up with a list of biobased products and will use a process similar to the CPG system (i.e., they will set standards and publish a list of vendors). A Web site may also be developed. Dana said an Affirmative Procurement Program is required under RCRA, however, the program can be made broader than RCRA.

Dana suggested that the EE and biobased items could be included as part of DOE=s Greening Strategy or Plan.
Kristin Klossner (Sandia/NM) asked for an example of how flow down to subcontractors would work, since the requirement should create no undue stress on the subcontractor, and since there may be no tracking or reporting mechanism in place. Richard Langston said that the prime contractor could estimate the information (purchases of CPG items) based on knowledge of project specifications and vendors. These estimates could be included in the EO 13101/RCRA Report. Richard said that he is not planning to require verification of the estimates. The new clauses **do not** mandate that the information be tracked by the subcontractor; however, the prime contractors need to report on products that are being used, if reliable estimates can be coordinated between the contractors.

Mary-Ann Somsen explained her site=s approach. INEEL helps the subcontractors by giving them a list of products (i.e., A-E specifications that include the CPG items and recommended recovered content). For instance, concrete specifications would include parameters for pozzolan and coal flyash. INEEL then fills out the EO 13101 report based on the amount of cubic yards of concrete used and the dollar amount purchased, which is provided by the subcontractor. This is easy to do for concrete, but harder for other products, such as insulation. [Note: Mary-Ann Somsen has provided worksheets that INEEL uses to obtain such estimates from their subcontractors, when CPG items are among the materials to be used by the subcontractors. The worksheets are attached to these minutes.]

After the teleconference, Richard Langston added following clarification regarding the flowdown issue. The management contractor should include recycled content materials in its Request For Proposal (RFP) specifications for construction, remodeling, or other service subcontracts, along with a worksheet and solicitation provision of the type used by INEEL. This worksheet would be submitted by the prospective subcontractor to indicate which products it will acquire with recycled content, and which are locally unavailable, unreasonably priced, etc. If the management contractor and subcontractor agree on the list of products and quantities, then the list can be used in the management contractor=s Affirmative Procurement report, and rather than flowing down a reporting requirement, the subcontract would contain an agreement that the subcontractor will acquire the listed items with recycled content. This should work for most situations.

On the other hand, if the subcontract is for the operation of a just-in-time supply operation, it may be impossible to estimate the quantities of recycled content products. In this situation, the RFP would identify the CPG Product List and the requirement to furnish these products with recycled content. The resulting subcontract would then need the DEAR 970.5223-2 (old DEAR 970.5204-39) clause, and reports would be required.

11:40 Proposed justification form for exempt purchases above the micropurchase threshold of $2,500 (see attached file) - Richard Langston

Richard Langston (HQ) explained the Affirmative Procurement Exemption Justification Form that he and Susan Weber (HQ) developed. The form would be used to document the reasons for not purchasing CPG items with recovered content. This documentation is required for purchases above the micropurchase level of $2,500. The proposed procedure is for the product requestor to fill out the form and sign it, along with the GAA. The proposed procedure for using the form currently does not include a provision for electronic signatures by the requestor or GAA. Requestors would access the form and fill out the information on the Web site, print the form and obtain the required signatures, maintain the signed form at the site, and submit copies of all signed forms to Headquarters once a year.

11:45 Discussion and questions on the proposed justification form

There was a discussion on who actually would do the research to determine if a CPG item is available - the requestor or procurement staff (i.e., the GAA). In general, Richard Langston (HQ) and the GAAs thought that the requestor would be the person that performs the determination. Mary-Ann Somsen (INEEL) said that, in her opinion, nothing would be accomplished if the requestor does the determination (i.e., the requestor mainly cares about getting their product, not about whether it is available with recovered content). She believes there should be one focal point for doing the research/determination and filling out the form. An exemption should only be allowed if the product cannot be obtained with recovered content.

There was a discussion about the various electronic systems that are already available, and/or in use at the sites (particularly for purchase card users), and how these systems would correspond to the proposed exemption form. There are many electronic systems available (i.e., EZ Web, Oracle, site-specific systems, etc.). Randy Cooper (NETL) stated that the EZ Web electronic procurement system (DOE=s E-Commerce system) currently does not have a Buying Green option. Richard Langston has a meeting set up to resolve this issue. Note that EZ Web is only available for Federal purchasers.

Sandra Cannon (PNNL) said that there are three different purchasing systems that need to be accounted for: 1) Federal purchasers 2) a centralized system where contracts/procurement staff do the purchasing, and 3) a decentralized system, where many people with purchase cards are making the purchases. For instance, David Hepner (SRS) said that all his purchase card users would need electronic access to the exemption form. At PNNL, 900 people have purchase cards and would need access to the form. For sites with sophisticated purchase card systems, switching to using the proposed form may actually be a step backward.

Richard Langston said that it is a good idea to have a standardized exemption form, to be used if needed; however, the standardized form shouldn=t create extra work if a system is already in place. Note that those users with existing tracking systems need to ensure that their systems have provisions for including written documentation to support the exemption, not just a box for checking that an exemption applies. Some purchase card systems may not accommodate this.

Another discussion concerned whether the GAA signature was required before purchasing an item. Based on feedback from Richard Langston and others (Franks Armstrong (WAPA), etc.), while it is not EPA=s intent that the exemption process slow down purchasing, and recognizing that emergency procurement situations may come up, the GAAs should sign off **before** a product with virgin content is purchased. However, the various tracking systems need to streamline the exemption/approval process as much as possible, so that purchases don=t bottleneck at the GAAs.

Another issue was whether written justification must be provided for purchases of virgin products below the micropurchase level of $2,500. **While sites need to report on all purchases, written justification is required only for individual purchases above $2,500.** Some sites, such as Strategic Petroleum Reserves, document exemptions for all purchases; while other sites have systems that trigger justification requirements only for purchases above $2,500. Also, the EO 13101 reporting software requires the user to provide a reason for not procuring items with recovered content. This presents a problem for sites that don=t track exemptions for purchases under $2,500, but the bulk of their individual purchases are below this level.

Bruce Webster (NETL) suggested changes to the form. In the note at the top of the form, the word Ashould≅ needs to be changed to Amust.≅ In addition, AApproved by GAA≅ needs to be changed to AConcurrence of GAA.≅
Note that GAAs are still mainly Federal procurement personnel who sign off on Federal purchases only. Contractors are encouraged to put their own systems and GAAs in place.

Anna Beard (Richland Operations Office) said that Richland is pursuing the use of its own electronic form. She asked whether using the proposed exemption justification form is mandatory. Richard Langston said no, it is not mandatory at this point. **[Note: The proposed form is a tool. There is no plan to mandate its use. However, written documentation is required for purchases over $2,500.]**

There was a question about whether EO 13101/RCRA allows three or four reasons for exemptions. Dana Arnold (OFEE/EPA) said that while Section 6002 of RCRA is not clearly worded, there are four possible reasons for exemptions: the item with recovered content 1) is not available competitively, 2) is not available within a reasonable time frame, 3) fails to meet performance standards, or 4) is only available at an unreasonable price.

Susan Weber (HQ) explained that the proposed exemption justification form was developed in an effort to unify reporting. The Acquisition Letter requires Federal employees and their contracting activities to sign off on virgin purchases of CPG items. If sites have their own systems, they do not need to use the form. This issue will be clarified in the Affirmative Procurement Program Guidance, which is being finalized.

Gene Iley (WAPA) said that the form is a useful tool to post on Web site. Kathy Batiste (SPR) said that the form is a good idea, but should be filled out for all purchases, not limited to purchases over $2,500.

Terry Heaton (SPR) asked about the status of site Pollution Prevention Plans; Susan Weber will call Terry with the information.

12:25 Topics for the next call: Affirmative Procurement Program Guidance, Green Product Updates, Sustainable Products

12:28 Date for next conference call: May 24

12:30 Adjourn

Sources of Information (Bold indicates especially pertinent to this teleconference)

U.S. Department of Energy
http://twilight.saic.com/ap/Farnopr.pdf
Notice of Proposed Rule Making: Department of Energy Acquisition Regulations. See especially Subpart 970.52 - Contract Clauses for Management and Operating Contracts

Office of Management and Budget
http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2000_register&docid=00-13819-filed
FAR Implementation of Greening the Government Executive Orders

U.S. Department of Energy=s EO 13101 home page
http://twilight.saic.com/ap
DOE EO 13101 reporting site, annual report, teleconference agenda and minutes, Implementation

Plan, and source of helpful information. For instance, to quickly find the EPA specifications and guidance for the designated products, look at the EO 13101 home page under Affirmative Procurement Program Guidance.

U.S. Environmental Protection Agency
http://www.epa.gov/cpg/products.htm
List of designated products pertaining to EO13101. Under each product is a list of manufacturers and suppliers for that product.

U.S. Environmental Protection Agency
http://www.epa.gov/fedrgstr/EPA-WASTE/2000/January/Day-19/f1066.htm
Eighteen newly designated products (EPA 40 CFR Part 247, Advisory Notice III; Final Rule; Federal Register, Comprehensive Guideline for Procurement of Products Containing Recovered Materials - January 19, 2000)

U.S. Environmental Protection Agency
http://notes.erg.com/
Environmentally preferable purchasing information for products and services

Office of the Federal Environmental Executive
http://ofee.gov/
Government Wide Strategic Plan for Implementing EO 13101

U.S. Department of Energy/Richland Operations Office
www.hanford.gov/polprev/ap.html
DOE-Richland=s Affirmative Procurement Strategy for Implementing EO13101

Executive Order 13101 (Replaces EO 12873) - Greening the Government through Waste Prevention, Recycling, and Federal Acquisition
http://www.ofee.gov/eo13101/13101.htm

Executive Order 13123 - Energy Efficiency
http://www.eren.doe.gov/femp/aboutfemp/exec13123.html

Executive Order 13134 - Developing and Promoting Biobased Products and Bioenergy
http://www.pub.whitehouse.gov/uri-res/I2R?urn:pdi://oma.eop.gov.us/1999/8/13/4.text.2

Executive Order 13148 - Greening the Government through Leadership in Environmental Management,
http://www.pub.whitehouse.gov/uri-res/I2R?urn:pdi://oma.eop.gov.us/2000/4/24

U.S. Environmental Protection Agency
http://www.epa.gov/opptintr/epp/
Database of product information and newsletter, *EPP Update*

U.S. Environmental Protection Agency
http://www.epa.gov/opptintr/epp/finalguidancetoc.htm
Guidance on Government Purchasing of Green Products

DOE Complex Wide Materials Exchange
http://wastenot.er.doe.gov/DOEmatex/index.html
Post available and search for wanted materials (especially chemicals, equipment, and hazardous materials)

at other DOE facilities. Log on with user name (erhquser) and password (erhqdoe).

U.S. Environmental Protection Agency
http://ofee.gov/html/rcra2.htm
Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act, May 12, 1999
AThe requirements of RCRA section 6002 apply to such procuring agencies only when procuring designated items where the price of the item exceeds $10,000 or the quantity of the item purchased in the previous year exceeded $10,000. The $10,000 threshold applies to all purchases made by an entire agency rather than regional or local offices (e.g., Department of the Interior, Department of Defense, etc). Most Federal agencies exceed the $10,000 threshold for EPA designated items.≅

Lawrence Berkeley National Laboratory Construction Guidelines
Contact Shelley Worsham, Tel. 510-486-6126, saworsham@lbl.gov
Incorporation of principles of EO13101 into the Laboratory=s construction guidelines for staff and sub-contractors. Log on with user name (erhquser) and password (erhqdoe).

"Painting the Town Green - Aberdeen Proving Ground Paint Pilot Project"
http://www.epa.gov/opptintr/epp/pdfs/paint.pdf
Results of paint pilot project at Aberdeen Proving Ground