

LESSON #1:

An Introduction to Affirmative Procurement

What If...

- ...you could save energy and conserve natural resources?
- ...you could impact the amount of waste that is sent to landfills?
- ...you could help stimulate the market for products that are made of recycled materials?
- ...you could lessen or decrease the negative effects on human health and the environment?

You Can!

- You have the potential to do all of this by simply knowing what products to buy in your workplace.
- Your installation has something called an “Affirmative Procurement Program.”
- Your installation also encourages the purchase of “Environmentally Preferable Products.”
- But what does this mean to you?...

Overview

- Affirmative procurement (AP) is required by federal law, executive order, and Air Force policy and instruction, and it applies to all Air Force personnel and purchases.
- The EPA has established a list of products made from recycled and recovered materials.
- AP is intended to stimulate recycling by requiring government agencies to purchase products on EPA's list.
- AP also encourages people to think about how certain products might impact human health or the environment and to select those products that have a lesser impact. This is called environmentally preferable purchasing (EPP).

Learning Objectives

- When you have completed this module, you will be able to:
 - Understand the definition and intent of the Affirmative Procurement Program.
 - Identify key benefits of affirmative procurement and environmentally preferable purchasing.
 - Identify key elements of affirmative procurement regulations.
 - Identify Air Force offices/agencies affected by the Affirmative Procurement Program.

What is Affirmative Procurement?

- Affirmative Procurement (AP) is the policy and practice of purchasing goods made with recycled materials and biobased products.
- EPA has identified numerous products that are made of recycled materials. These materials are designated in an EPA document called the Comprehensive Procurement Guidelines (CPG).
- USDA is in the process of designating biobased products.
- In simple terms, AP means “taking positive action in what we choose to buy so that our purchases are more environmentally friendly.”

What is an Affirmative Procurement Program?

- APP is a process to:
 - Increase government purchases of environmentally friendly products.
 - Ensure that the recycled-content products on EPA's list will be purchased whenever they are cost effective, reasonably available, and technically appropriate.
 - Ensure practices are consistent with federal law and procurement regulations.
 - Increase purchases of biobased products, once USDA creates a biobased product list.

What is the Intent of an APP?

- The intent of an APP is to:
 - Stimulate recycling by providing a market for new products manufactured with recycled materials.
 - Encourage environmentally preferable purchasing (EPP).
 - Give consideration to “biobased products,” such as biodiesel.

What is Environmentally Preferable Purchasing?

- Environmentally preferable purchasing (EPP) encourages the purchase of products which have lesser or decreased effects on human health and the environment, such as those with:
 - Reduced toxicity
 - Less energy consumption
 - Less packaging
 - Less hazardous waste generation
 - Reparability
 - Recycled content

Let's Compare AP to EPP...

- Affirmative procurement is a mandatory program.
 - Federal agencies are *required* to purchase recycled content materials that are designated by EPA.
- Environmentally preferable purchasing includes AP and expands the focus beyond recycled content, to consider other factors like energy conservation or toxicity.
 - EPP *encourages* the purchase of products that minimize the impact to human health and the environment.
- The mandatory purchase requirements of the APP apply only to recycled-content products, but not to biobased products.
- Biobased product purchases will also become mandatory once USDA publishes a final product list.

AP and EPP Benefits

- Closes the recycling loop by creating a market for recycled goods.
 - Buying re-refined motor oil and sending back used oil for re-refining is an example of closed-loop recycling.
- Minimizes the consumption of energy.
 - Products made with recycled materials use less energy to produce than products made with virgin materials.
- Conserves natural resources by using “already used” materials versus virgin materials.
- Saves money through decreased disposal costs.

More Benefits...

- Reduces pollution and toxicity by eliminating coatings, preservatives, and some pesticides.
- Saves landfill space by eliminating waste streams.
- Recycling metal cans and plastic bottles saves space in landfills and avoids resource extraction and costs for mining and processing raw materials.
- Recycled plastic, steel and aluminum are made into new products for construction and other uses

Even More Benefits...

- Increases product durability, therefore reducing maintenance efforts.
- Using plastic decking material eliminates the need to paint or waterproof a wooden deck. It also saves trees and eliminates the use of pesticides to protect wood against termites.

Why is the Air Force Involved?

- The Air Force, combined with other federal agencies, provides "strength in numbers."
- This strength in numbers provides significant purchasing power, which can help to boost economic markets.
- A similar example of such strength is the unified labor unions formed during the industrial age: they help to force better safety standards, higher wages, and better working conditions for millions of employees.
- The purchases made by the Air Force and other federal agencies can stimulate the recycled products market and help to drive down the cost of recycling programs nationwide.

Who in the Air Force is Involved?

- This program affects everyone, including:
 - All AF CONUS installations.
 - Non-appropriated fund activities.
 - Contracts awarded by the U.S. Air Force.
- All OCONUS installations must comply with EPA requirements for materials purchased in the U.S. and shipped overseas.

Examples of Who is Affected on an Installation

- Users of the GPC, or Government-wide Purchase Card.
- Contracting officers and project engineers.
- Contractors and vendors providing materials.
- AAFES, commissaries, and MWR activities.
 - Non-appropriated fund activities must follow AP rules for the products they use. They are not restricted by AP rules for products they stock and sell.

What Are the Regulatory Drivers?

- Resource Conservation and Recovery Act (RCRA) Section 6002
- Executive Order (EO) 13101
- Air Force Instruction (AFI) 32-7080
- Air Force Policy Memo, dated 31 May 2000
- AF Engineering Technical Letter (ETL) 00-1
- Comprehensive Procurement Guidelines (CPG) - Federal Register “Final Rules” and 40 CFR 247
- Federal Acquisition Regulation (FAR)
- Farm Security and Rural Investment Act of 2002 (the "Farm Bill") – Section 9002

RCRA Section 6002

- RCRA requires federal agencies to give preference in their purchasing programs to products and practices that conserve and protect natural resources and the environment.
- RCRA outlines four required elements for AP programs:
 1. Preference Program
 2. Promotion Program
 3. Vendor Estimates, Certification and Verification Program
 4. Monitoring Program
- Let's take a look at each one of these elements...

RCRA's Preference Program

- A preference program:
 - Shows employees, contractors and potential vendors that the installation prefers to purchase products that contain recycled materials meeting the EPA guidelines.
 - Is promoted through formal policy statements.
 - Is implemented through the base AP Plan.
 - Requires modification of contract language and specifications to ensure vendors comply.

RCRA's Promotion Program

- A promotion program:
 - Includes steps the installation takes to familiarize installation personnel with APP requirements
- The base AP Plan describes these steps. Promotional activities may include:
 - Articles in the base paper; flyers; brochures
 - Training, workshops, or conferences
 - Contests, product fairs, vendor days or other outreach activities

RCRA's Vendor Estimates, Certification, and Verification Program

- This part of the RCRA program includes:
 - Contract language requiring vendors to identify the amount of recovered materials used in the performance of the contract.
 - A means for installations to verify that the information provided by vendors is correct.
 - Vendor estimates and certifications are only required for contracts over the simplified acquisition threshold of \$100,000.

RCRA's Monitoring Program

- A monitoring program provides a means to review and evaluate the effectiveness of the APP on an annual basis. It has two parts:
 - Formal reporting required by RCRA:
 - Tracking contracts containing AP language; and
 - Tracking number of personnel trained in APP.
 - In-house auditing to determine program health:
 - Program effectiveness and growth;
 - APP awareness level among base personnel; and
 - Installation training needs.

Executive Order (EO) 13101

- This EO was written to improve the federal government's use of recycled-content products and to include other environmentally preferable products and services.
- It describes requirements for federal agencies.
- It also directs environmental regulators to include AP in compliance inspections conducted by the EPA and States.
 - The audits focus on the overall APP at an installation, in addition to specifically looking at the APP activities in vehicle maintenance shops.
 - Your base can get a Notice of Violation from the regulators, or an ESOHCAMP finding, if the APP is inadequate.

Air Force Instruction (AFI) 32-7080

- The revised AFI 32-7080, *Compliance Assurance and Pollution Prevention*, outlines Air Force policies, requirements, goals, and responsibilities for affirmative procurement.
- It mandates using a team approach to implement and manage the APP.
- Although this AFI is in the Civil Engineering series, its requirements apply beyond CE and the Environmental Flight to personnel in LGC, LGS, JA, SE, SG, and PA.

Air Force Policy Memo

- Civil Engineering and Contracting co-signed this policy memo in May 2000 to show shared responsibility for the program.
- The policy covers the general requirements and approach the Air Force will take to meet AP requirements.
- It guides the implementation at installations using the EPC and/or Environmental Safety and Occupational Health Committee (ESOHC)
 - EPC/ESOHC oversees APP implementation; and
 - Charters a cross-functional team for program execution.
 - Requires bases to develop an AP plan.

AF Engineering Technical Letter (ETL) 00-1

- ETL 00-1 requires all Air Force Civil Engineering specifications to comply with AP requirements.
 - Includes items in **construction contracts**, such as carpet, tiles, wallboard, and landscape products.
 - Includes items in **service contracts**, such as sanitary tissue products and plastic trash bags.
 - ETL 00-1 supersedes ETL 94-7

Comprehensive Procurement Guidelines

- The list of recycled content items designated by the EPA is updated every two or three years.
- EPA uses the Federal Register to designate recycled content items covered by AP and to inform industry when the list is being updated.
- The Code of Federal Regulations (CFR)
 - makes AP mandatory; and
 - lists product categories, defines terms, and describes program applicability.
- Once EPA designates an item, bases are required to comply within one year.

Federal Acquisition Regulation (FAR)

- The FAR provides the procurement guidelines for all government purchases
- Requirements of both RCRA and Executive Order 13101 are translated into requirements in the FAR.
- The FAR includes AP requirements for the government and its contractors:
 - Appropriate FAR clauses must be placed in contract language in order to get vendors to comply with the requirements.
 - Statements of Work must be written to require the contracted firms to maximize recycled-content material use.

Air Force APP Metrics

- The Air Force is striving for continuous improvement in APP performance based on the following metrics:
 - Metric I: Percentage of contracts, by both number and value of contracts, that include the FAR clauses for use of recycled materials.
 - Metric II: Percentage of contracts with APP clauses that are fully compliant with APP requirements.
 - Metric III: Percentage of purchase card holders, specification writers, and contracting personnel trained on APP.
- Data collection for Metrics I and II is automatic, using Contracting's DD Form 350. Reporting processes for Metric III are still being determined.

Let's Review...

- AP is the policy and practice of purchasing goods made with recycled materials.
- AP is intended to:
 - stimulate recycling by providing a market for recycled-content products,
 - encourage environmentally preferable purchases, and
 - increase the use of biobased products.
- AP provides a wide range of benefits, both financial and environmental.
- AP applies to all EPA-designated items that DoD purchases.
- AP will also apply to biobased products as soon as USDA publishes the final product list.

Review (continued)

- Laws, regulations, and executive orders combine to provide the authority and requirements for federal affirmative procurement programs.
- Your installation can receive an ECAMP finding, or a Notice of Violation from EPA or State inspectors if the APP is inadequate.
- In short, every Air Force installation is affected, and all Air Force personnel need to understand AP because it *applies to every AF purchase of EPA-designated items, regardless of dollar amount.*

LESSON #2:

Affirmative Procurement Implementation

From Lesson 1, You Should Recall That:

- Affirmative procurement (AP) is the policy and practice of purchasing goods made with recycled or recovered materials.
- EPA has identified numerous products that are made of recycled materials.
- AP is required by law and it applies to all federal agencies and all Environmental Protection Agency (EPA) guideline items that Department of Defense (DoD) purchases.
- Once USDA publishes the biobased product list, federal agencies must purchase these products also.

Now, let's look at how the AP Program is carried out at your installation...

Overview

- Execution of an Affirmative Procurement Program (APP) depends on all base personnel.
- EPA has a website with up-to-date Comprehensive Procurement Guideline (CPG) items.
- DoD has established sources of supply that are easy to use when purchasing CPG items.
- Installations may claim certain exemptions from the affirmative procurement requirements.
- Biobased products are also part of the AP program, and the U.S. Department of Agriculture (USDA) is creating a listing of these products.

Learning Objectives

- When you have completed this module, you will be able to:
 - Identify the base organizations that must comply with APP.
 - Identify where to locate EPA's updated list of CPG items
 - Select the correct CPG category for products.
 - Identify procurement resources that specialize in providing AP products.
 - Identify the criteria for claiming exemptions from purchasing an AP product.
 - Identify elements of APP implementation.
 - Identify biobased product categories.

Why Does AP Take a Team Approach?

- Most functional areas at an installation are both buyers and users of products, and most organizations use CPG items in one form or fashion.
- Organizations such as LG Contracting and CE Construction typically write contracts and specifications for major procurement actions.
- Shop-level organizations typically are product users, but they can also be purchasers through the government procurement card.
- Public Affairs can help with promotional activities.
- Bioenvironmental Engineering can help identify health impacts of certain products.

Building the Team

- Coordination among all functional areas is critical to ensure all AP requirements are being met.
- Air Force Instruction (AFI) 32-7080 requires a cross-functional team.
- The AP Team must be chartered and approved by the Environmental Protection Committee (EPC), and include representatives from key areas.

Functional Areas at an Installation

- Everyone at the installation works together to implement AP.
- Basically, anyone with purchasing responsibilities, including non-appropriated funds (NAF) activities, is involved.

What Is the CPG and How Does it Help Me Implement APP?

- The CPG is a list of products that are made of recycled or recovered materials.
- EPA uses this list to designate the items that are included in the affirmative procurement program.
- You can use this list to identify which types of products you are currently using and/or specifying in contracts, and determine if you can purchase a recycled-content product instead.
- According to Executive Order (EO) 13101, the EPA is required to update the CPG every 2 years. You can find the most up-to-date list of items on EPA's website.

How Do I Know When the CPG Has Changed?

- The CPG is updated every two years or as appropriate.
- Bases have one year to incorporate new items into their APP, so it is important to stay informed on changes to the CPG.
- The AP Team will provide information on updated requirements, but individuals on base also have the responsibility to check for the most up-to-date listing of CPG items.
- The best resource for this is the EPA CPG website--check this website regularly for updates to the product listing.

What Recycled-Content Items are Available for Purchase?

- EPA's list of designated products and the accompanying recycled-content recommendations are grouped into the following eight categories.
 - Construction Products
 - Landscaping Products
 - Non-paper Office Products
 - Paper and Paper Products
 - Park and Recreation Products
 - Transportation Products
 - Vehicular Products
 - Miscellaneous Products
 - EPA Fact Sheets are available for each category, and links to those fact sheets are included on the following slides describing some of the products in each of the categories.

Post-consumer vs. Recovered Materials

- Recovered material:
 - Waste materials and byproducts which have been recovered from solid waste.
 - Does not include materials and byproducts generated from, and commonly reused within, an original manufacturing process.
- Post-consumer material:
 - A material or finished product that has served its intended use and has been diverted from waste destined for disposal, having completed its life as a consumer item.
 - Part of the broader category of recovered materials.
- The EPA uses the Recovered Materials Advisory Notices (RMAN) to document the amount of post-consumer and recovered materials content required for each of the CPG items.

Construction Products

- Recycled construction products are cost-effective, reliable, easy to obtain, and environmentally friendly. These products can be used in a variety of projects from buildings to highways.
 - Building Insulation
 - Cement and concrete
 - Laminated paperboard
 - Structural fiberboard
 - Shower and restroom dividers
 - Consolidated and reprocessed latex paint
 - Railroad grade crossings/surfaces
 - Carpet
 - Floor tiles
 - Patio blocks
 - Carpet cushion
 - Flowable fill

Landscaping Products

- Recycled-content landscaping products offer a quick, effective, and affordable way to make the grounds green
- Garden and soaker hoses
- Hydraulic mulch
- Lawn and garden edging
- Yard trimmings compost
- Food waste compost
- Landscaping timbers and posts (plastic lumber)

Non-paper Office Products

- Any number of items that you recycle can end up back at your office as another product- from soda bottles turned into pencil holders to used toner cartridges refurbished and put back into use.
 - Office recycling containers
 - Office waste receptacles
 - Plastic envelopes
 - Toner cartridges
 - Plastic clipboards
 - Plastic presentation folders
 - Plastic desktop accessories
 - Binders
 - Plastic trash bags
 - Printer ribbons
 - Solid plastic binders
 - Plastic clip portfolios
 - Plastic file folders

Paper and Paper Products

- A wide range of types of recycled content papers are available, including newsprint, paper towels, corrugated packaging, and writing and copying paper—all with higher quality and more availability than just a few years ago.
 - Commercial/industrial sanitary tissue products
 - Miscellaneous papers
 - Newsprint
 - Paperboard and packaging products
 - Printing and writing papers

Park and Recreation Products

- Buying recycled content playground equipment and other recreational products is cost-effective, easy to do, and a good way to keep our outdoors green.
 - Plastic fencing
 - Park and recreational furniture
 - Playground surfaces
 - Playground equipment
 - Running tracks

Transportation Products

- Transportation officials around the country are reporting that recycled content safety cones, traffic barricades, traffic control devices, and parking stops deliver high performance and cut installation and maintenance costs.
 - Channelizers
 - Delineators
 - Flexible delineators
 - Parking stops
 - Traffic barricades
 - Traffic cones

Vehicular Products

- Cost-effective, reliable, and high quality recycled content vehicular products are being used with success by many government agencies nationwide.
 - Engine coolants
 - Re-refined lubricating oils
 - Retread tires

Miscellaneous Products

- Today's products made from recycled materials offer the strength, durability, and performance equivalent to those made with new materials.
 - Pallets
 - Industrial drums
 - Sorbents
 - Mats
 - Awards and plaques
 - Signage, including supports
 - Strapping

More CPG Products to Come

- As mentioned earlier, EPA updates the CPG every 2 years, based on availability, environmental impact, economics, and technical feasibility. The following items are under consideration for future inclusion:
 - Bike racks
 - Modular threshold ramps
 - Office furniture
 - Roofing materials
 - Cement and concrete containing silica fume or cenospheres
 - Nylon carpet and nylon carpet backing
 - Blasting grit
 - Nonpressure pipe
 - Rebuilt vehicular parts
 - Tires

How Do I Know Where to Buy CPG Items?

- Although purchases may be made in town at local stores, the following agencies have made purchasing CPG items easy to do from your desk:
 - General Services Administration (GSA)
 - Defense Logistics Agency (DLA)
 - Government Printing Office (GPO)
 - Federal Logistics Information System (FLIS)
 - Onbase Supply Store
 - Javits-Wagner-O'Day (JWOD) Catalog
 - UNICOR
- See the Reference section for links to most of these websites.

Sources of Supply Are Easy to Use!

- GSA, DLA, and GPO have automatic substitution for paper and re-refined oil- orders through these agencies are worry-free for AP compliance.
- The National Stock Number (NSN) for these products automatically gives products with the appropriate recycled content according to EPA CPG guidelines.
- GSA, DLA, and GPO also report all federal purchases up the chain so that determination of AP compliance is simplified.
- Easy to use the sources of supply to obtain CPG compliant materials.
- For local purchases, store websites often provide recycled content information or the information may be obtained at the retail location.

Do any exceptions to purchasing and using CPG items exist?

- Sometimes purchasing a CPG item may be impossible. For instance, when the CPG item:
 - Does not meet reasonable technical requirements.
 - Costs more than a comparable product made of virgin materials.
 - Consider life cycle costs, not just the initial purchase cost.
 - Is not competitively available within a reasonable period of time.

How to Claim an Exemption

- You may claim an exemption if one or more of the three exemption criteria are met.
- If your purchase is over \$2,500 (or over \$2,000 for construction) then you must complete a recovered materials determination form.
 - The recovered materials determination form provides written explanation of why you are claiming the exemption.
- Organizations who use an exemption must keep documentation in the contract file for all exemptions as a way to track thought processes; it can be used to show compliance with AP during audits.
- The project manager or purchaser fills out the form, signs it, and gives it to the contracting officer to file.

What Are Biobased Products?

- In addition to recycled- or recovered-content materials, there is another category of products that are “environmentally preferable”, and this includes biobased products.
- These include commercial or industrial products, other than food or feed, that are produced from biological products or renewable domestic agricultural or forestry materials.
- The “Farm Bill” makes biobased product purchases mandatory.
- Mandatory purchase requirements will take effect as soon as USDA publishes the final biobased product list.

Biobased Product Categories

- Alternative fuels and fuel additives
- Lubricants and functional fluids
- Sorbents
- Adhesives
- Fibers, paper, and packaging
- Inks

More Biobased Product Categories

- Solvents and cleaners
- Paints and coatings
- Construction materials and composites
- Plastics
- Landscaping materials and composted agricultural residue

Elements of AP Implementation

- Identify AP opportunities
 - Comparison shop
 - Ask for alternatives
- Talk with vendors and manufacturers and prepare a local list of environmentally preferable products and suppliers
 - Ask for life-cycle costs
 - Ask for possible alternatives and new products when purchasing
- Consider cooperative purchasing for better prices
 - Talk to other bases
 - Join the Recycled Products Purchasing Cooperative

More Elements of AP Implementation

- Use available resources
 - Web sites for vendors and from government agencies
- Set up “closed loop” contracts
 - DLA offers access to closed-loop contracts for re-refined oil
 - Like the water cycle- rain falls, stays on ground, evaporates, and becomes rain again (continuous process)
- Review and revise all specifications and contracts to enhance purchase of CPG and biobased items
- Buy appropriate products for in-house use

Remember That the Success of the APP Is Measured...

- The AP Team self monitors the APP every year.
- The HQ USAF metrics for APP include:
 - Metric I: percentage of contracts that include FAR clauses for use of recycled materials (use DD Form 350)
 - Metric II: percentage of contracts with AP clauses sorted by DD Form 350 Block B12F code, which measures whether the purchases made on the contract actually comply with the EPA guidelines or whether they claimed an exemption
 - Metric III: percentage of purchase card holders, specification writers, and contracting personnel trained in APP
- The installation can get a notice of violation (NOV) or an ECAMP finding for deficiencies in the APP.

Let's review...

- Execution of the APP depends on *all* base personnel. The AP Team provides guidance and information, but individuals must participate to make it work.
- The EPA website contains up-to-date list of CPG items in each of the designated categories.
- The Air Force has established sources of supply that are easy to use when purchasing CPG items.

Review (continued)

- Document any applicable exemptions from AP purchasing for purchases over \$2,500 (\$2,000 for construction) to show you are following the law.
- The purchase of biobased products is also required under AP. The USDA is creating a listing of these products. Once the list is final, we must purchase biobased *and* recycled products as part of AP.
- Air Force metrics are used to measure program success, and your participation is key to our success!

LESSON #3A:

AP for Engineering and Environmental Personnel

What Types of Products and Services Does Civil Engineering Buy?

- Building insulation
- Lumber
- Ceiling tile
- Sanitary tissue
- Flowable fill
- Latex paint
- Garden hoses
- Park benches

Lesson Overview

- Each function within Civil Engineering (CE) has an impact on the Affirmative Procurement Program (APP).
- Quality assurance evaluators (QAEs) must know AP requirements in order to ensure compliance in CE contract efforts.
- CE plays a critical role in implementing the four required APP elements: preference, promotion, certification, and monitoring.
- CE functions purchase a large number of Comprehensive Procurement Guideline (CPG) items, and as a result, CE support is essential for a successful AP program.
- CE project specifications and service contracts must be written to promote “environmentally friendly” and resource efficient practices.

Learning Objectives

- When you have completed this module, you will be able to:
 - Identify CE roles and responsibilities in the scope of AP.
 - Identify ways CE personnel can implement each of the APP elements.
 - Identify the consequences of noncompliance with AP requirements.
 - Identify how to document the use of AP exemptions.
 - Identify CPG items commonly used within CE.
 - Identify unique requirements for paper, re-refined oil, and retread tires.
 - Identify additional “environmentally friendly” product characteristics that you should consider when buying items.
 - Identify ways to make CE construction projects more resource efficient.

Overall Scope of APP

- According to Executive Order (EO) 13101, Section 402, installations shall do the following:
 - Consider AP in planning for all procurement and contracts.
 - Establish AP programs using a cross-functional team.
 - Ensure that responsibilities are shared between program and procurement personnel.
 - Ensure that AP programs require 100% of purchases of guideline items to meet or exceed the EPA guideline unless an exemption is justified in writing.
 - For newly designated items, revise AP program within one year from the date of the EPA's final rulemaking.

AP Teamwork

- AP is not the responsibility of one particular group, but rather requires the wide-reaching support of many base personnel.
- The AP Team at each installation will decide the specific division of roles for implementation.
- Within CE, there are three separate and distinct AP-related roles within the following organizations:
 - CE Environmental (CEV)
 - CE Engineering (CEC)
 - CE Operations (CEO)

Let's explore each of these roles...

What is the Role of CEV?

- The Pollution Prevention (P2) Manager within the Environmental Flight (CEV) frequently oversees the implementation of AP as part of the P2 program.
- CEV has a designated representative as part of the AP team, and usually plays a key role in development and maintenance of the installation's AP Plan.

What Else Can CEV Do?

- CEV typically helps promote the APP through events like Earth Day and through development of fact sheets on CPG items and APP implementation.
- CEV works with Contracting to provide education and training for base personnel.
- CEV also programs P2 funds to cover eligible APP-related projects.

Why is CEC Involved?

- About 1/3 of the recycled-content items on the EPA's list are construction related--for example:
 - cement and concrete,
 - carpet and floor tiles, and
 - building insulation
- Because of this, CEC is a particularly important driver in ensuring that AP requirements are considered in all contract and work order specifications.

How does CEC participate?

- CEC plays a role on the AP Team because they write product specifications and participate in quality assurance evaluations.
- CEC should be reviewing the CPG item lists, and developing or rewriting specifications to ensure these products are used whenever possible.
- CEC personnel must include AP language in contracts and must ensure that the CPG items are actually put into use -- this includes both construction and service contracts.
- CEC personnel will also specify biobased products where technically appropriate and cost effective.

Why Does CEO Influence AP?

- CEO has the most direct impact on the use of CPG items at an installation because of their day-to-day operations.
- The following are examples of CPG items commonly used in service contracts:
 - Compost and mulch for grounds maintenance;
 - Paper, toner cartridges and printer ribbons for reproduction activities; and
 - Sanitary tissue products in custodial contracts.

How Can CEO Be Involved?

- CEO managers and shop superintendents must ensure that all personnel are familiar with APP requirements and CPG items that affect their shops.
- When the Government-wide Purchase Card is used, managers should stress the importance of purchasing CPG items.
- CEO should work in parallel with CEC to ensure that CPG items are used for in-house projects.
- CEO will also use biobased products when they meet technical requirements and are cost effective.

Critical Role of Contract QAE

- It is important that the QAEs understand their role in the APP. They are the front line for ensuring contract requirements for APP elements are being met. Specifically, they need to:
 - Review project contract specifications and service contracts to identify what CPG items are included.
 - Identify percent recycled content required for each CPG item.
 - Determine if products actually brought on site meet the recycled-content requirements by:
 - Reading product labels or other manufacturer literature.
 - Inspecting products brought on base by contractors.
 - Report to project manager when problems are identified.

AP Program Elements

- In general, CE supports the APP by adhering to the Resource Conservation and Recovery Act (RCRA) requirements and by following EO 13101.
- CE must team with LG in order to fully implement the RCRA requirements.
- Let's review the four RCRA elements...

Recall the Four RCRA Required Elements...

1. **Preference Program**--indicates the installation's desire to use/purchase recycled content items (i.e., CPG items) over non-recycled content items.
2. **Promotion Program**--steps the installation takes to familiarize personnel with APP requirements.
3. **Vendor Estimates, Certification and Verification Program**--vendors identify items with recycled content, vendors certify the recycled content, the installation verifies the recycled content.
4. **Monitoring Program**--provides a means to review and evaluate the effectiveness of the APP on an annual basis.

How Do You Implement RCRA's Preference Program?

- This program encourages purchases of CPG items over similar non-recycled content items.
- To indicate a preference for recycled materials, include AP language in all contracts and specifications.
 - Include detailed requirements in construction specs. Army and Navy guide specs may be used as templates.
 - Review all Performance Work Statements for service contracts to make sure AP requirements are included.
- Complete the Recovered Materials Determination Form and include it with the requirements package provided to Contracting.
- Team with LG--especially Contracting!

What Actions Should Be Taken to Document RCRA's Preference Program?

- Write an AP policy letter similar to policy letter about recycling--this shows upper level support of the program.
 - See App C of EPA's final guidance on Environmentally Preferable Purchasing (EPP), Aug 1999.
- Develop an APP Plan for the installation.
 - Sample plans are included on the AFCEE website.
- Discuss the APP Plan at AP Team meetings.
 - Use meeting minutes to show how the installation is carrying out the actions required by the Plan.

Ideas of Ways to Advertise CPG Items Within the Promotion Program

- Familiarize all purchasers with APP requirements.
 - Advertise APP as you would a base recycling program - it affects almost as many people.
- Conduct workshops or training sessions.
 - CEV helps the Contracting office train Purchase Card holders.
 - Be sure to educate the construction team and QAEs.
- Publish a list of local vendors of recycled content products.

More Ideas of How to Advertise CPG Items Within the Promotion Program

- Write articles for Public Affairs to publish--use the base newspaper as a resource.
- Prepare a fact sheet about the installation's APP--example fact sheets are on AFCEE's website.
- Discuss the installation's APP at bidder's conferences.
- The AP Team will determine who oversees each aspect of the above ideas. Your team may also come up with other ideas.

Increase the Use of CPG Products Through the Promotion Program

- Promote CPG usage through demonstration of the items.
- Consider using a facility construction or renovation project as a showcase for recycled content and biobased building materials.
 - This fits in with the “sustainable design” concept.
- Provide periodic updates on new items and usage.

Other Ways to Increase the Use of CPG Products through the Promotion Program

- Update local operating instructions and tie APP requirements to the Facility Excellence Plan.
- Seek volunteer organizations for limited trials of new products.
 - For example, test recycled latex paint on a small in-house project to demonstrate that it performs well.
- Remember these are just ideas--the AP Team can implement a promotion program in many ways.

How Do You Implement RCRA's Vendor Estimates, Certification, and Verification Program?

- This RCRA element is only required for purchases over the “simplified acquisition threshold” of \$100,000.
- Vendors *estimate* and *certify* the amount of recycled material that will be included in a product.
 - The amount of recycled materials must comply with the EPA guidelines.
- Contracting officers can only require vendor certification if the technical project manager tells them (in writing) that the vendor estimates can be verified.

How is Verification Accomplished?

- After product delivery, the project manager must *verify* that the estimates were accurate.
- Contracting officers share the responsibility in this part of the APP:
 - They must ensure that contracts and specifications contain necessary FAR clauses requiring vendors to supply CPG items.

What Does the AP FAR Provision Say?

- The FAR provision listed below should be included in all contracts.
- **FAR 52.223-4:**
- As required by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6962(c)(3)(A)(i)), the offeror certifies, by signing this offer, that the percentage of recovered materials to be used in the performance of the contract will be at least the amount required by the applicable contract specifications.

What Does the AP FAR Clause Say?

- The FAR clause listed below should be included in all contracts over \$100,000.
- **FAR 52.223-9:**
- (1) Estimate the percentage of the total recovered material used in contract performance, including, if applicable, the percentage of post-consumer material content; and
- (2) Submit this estimate to _____
[Contracting Officer complete in accordance with agency procedures].
- Alternate 1 to this clause requires vendor certification. Contracting officers use Alternate 1 if the project manager advises (in writing) that the estimate can be verified.

Certification Statement

- Vendors certify that the percentage of recovered content used in the performance of the contract meets EPA guidelines.
- The certification must be in the form of a product label or an attached statement to the bid documents. The contract clause reads as follows:
- “I, _____ (name of certifier), am an officer or employee responsible for the performance of this contract and hereby certify that the percentage of recovered material content for EPA-designated products met the applicable contract specifications.”

[Signature of the Officer or Employee]

How Do CE Project Managers Verify That Purchases Follow CPG Guidelines?

- The CE Project Manager:
 - Verifies that the contractor's material submittals are accurate and complete with regards to specifications.
 - A key part of this review process is to ensure that the contractor is buying products that meet the recycled-content requirements in the project specifications

How Do CE QAEs Verify That Purchases Follow CPG Guidelines?

- CE Quality Assurance Evaluators:
 - QAEs must look at the actual labels on products that are delivered to the construction site or used by service contractors.
 - The purpose of this review is to check that the contractor followed through and met the recycled-content requirements in the project specifications or Performance Work Statement.

How Is AP Monitoring Accomplished?

- Monitoring has two distinct parts--internal and external.
- Internal monitoring is the responsibility of all organizations represented on the AP Team:
 - LG Contracting is responsible for tracking contract compliance using the DD Form 350.
 - The Purchase Card Program Coordinator and billing officials conduct audits of credit card purchases.
 - CEV will have the lead on some monitoring actions:
 - Monitors AP Training and Recycling Metrics.
 - Primary contact for ECAMP Team visits to the installation.

Internal Monitoring (continued)

- Individual organizations need to monitor their own activities to ensure they are meeting requirements and carrying out the actions in the base AP Plan.
 - For example, CE can monitor contracts for inclusion of CPG items in statements of work and specifications.
- MAJCOMs also monitor compliance through the ECAMP and ESOHCAMP.

External Monitoring

- External assessments and inspections:
 - AP compliance is evaluated during EPA and state compliance inspections - - an installation can receive a notice of violation (NOV) for deficiencies.
 - EPA will use a questionnaire to review the basewide AP program, and will also visit vehicle maintenance shops to inspect for AP compliance.

What Happens when the Base Receives a NOV?

- EPA gets its inspection authority from EO 13101, Section 403.
- A Notice of Violation (NOV) may be issued for AP deficiencies; however, the EPA cannot give the installation a fine or force them to do anything to correct the deficiency.
- An installation should NEVER voluntarily enter into a compliance agreement with EPA for actions related to AP.
- If the base receives a NOV, they should accept it without agreeing to any response actions, and then consult their legal office and the MAJCOM.

How Can You Prevent a NOV?

- The Reference section contains a list of questions relating to monitoring.
- These questions may be used by external evaluators or regulators to determine compliance of the AP Program.
- The installation should also review these questions and make them part of the self-assessment process in order to make sure that the APP is in compliance and has all the necessary components.

Let's Review What the CPG is...

- The CPG list contains the requirements for the percentage of post-consumer content and the percentage of total recovered materials content that certain products must contain.
- The most up-to-date list of CPG items is on EPA's website.
- You can go to the EPA web site and print out the lists that apply to your operations. Posting them in your work area helps to remind everyone about AP requirements.

More On the CPG...

- The CPG list has over 50 products listed in 8 categories and EPA Fact Sheets are available for each category. (Links to the fact sheets are included in the Reference section.)
- EPA adds products to the list every 2 years.
- Products that EPA is proposing to add to the CPG are shown on their web site along with the current list of guideline items.
- Installations need to include all new items in their AP programs within one year of EPA's adding it to the list.

Exemptions to Purchasing CPG Items

- Sometimes purchasing a CPG item may be impossible.
- Recall that RCRA contains the following exemptions from buying CPG items:
 - The product does not meet reasonable technical requirements.
 - The product costs more than a comparable product made of virgin materials.
 - The product is not competitively available within a reasonable period of time.

When Do You Have to Document That You Have Used an Exemption?

- *Written documentation required:*
 - All purchases, including GPC, >\$2500 (\$2000 for construction) will meet EPA recycled-content requirements unless an exemption applies
- *No written documentation required :*
 - All purchases, including GPC, <\$2500 (\$2000 for construction) will meet EPA recycled-content requirements unless an exemption applies

Who Does the Paperwork?

- You must keep some sort of documentation to explain the reason for the exemption: price, technical requirements, availability.
- Your AP Team will designate the format to be used.
- The purchaser or project manager fills out the exemption determination:
 - There is no longer a requirement for Commander's signature on the form.
 - The completed form goes in the contract file or the purchaser's records.
- Documentation helps prove to inspectors and auditors that you considered AP in your purchasing process.

Recall the Types of Products and Services that Civil Engineering Buys...

- Building insulation
- Lumber
- Ceiling tile
- Sanitary tissue
- Flowable fill
- Latex paint
- Garden hoses
- Park benches

Understanding EPA's Requirements

- The EPA CPG web site has tables that show how much “recovered material” needs to be in each CPG item.
 - For the APP, “recovered material” means the same thing as “recycled material”.
 - Some items have a “total recovered material” requirement.
 - Some items have a “post-consumer recovered material” requirement.
 - Some items have both kinds of requirements.

An Example of EPA's Requirements

- EPA's Recovered Materials Content Levels for Office Recycling Containers and Office Waste Receptacles

Materials	Post Consumer Content %	Total Recovered Materials Content %
Plastic	20-100	---
Steel	16	25-30
Corrugated	25-50	25-50
Solid Fiber Boxes	40	---
Industrial Paperboard	40-80	100

CPG Categories

- Determine which categories below apply to your shop/work area.
 - Construction Products
 - Landscaping Products
 - Non-paper office products
 - Paper and paper products
 - Park and recreation products
 - Transportation products
 - Vehicular products
 - Miscellaneous products

Special Requirements for Certain CPG Items

- Because the federal government has a large number of fleet vehicles and consumes a vast amount of paper, the following CPG items have special emphasis in EO 13101:
 - Paper,
 - Re-refined oil, and
 - Retread tires.
- Let's take a look at these items and the special requirements for each.

Special Requirements for Paper

- When you buy any of these items:
 - high speed copier paper
 - forms bonds
 - carbonless paper
 - white wove envelopes
 - book paper
 - cover stock
 - offset paper
 - computer printout paper
 - cotton fiber paper
 - writing and office paper
 - file folders

the special requirements in EO 13101 apply.

Purchasing Paper in Compliance with EO 13101 Requirements

- For all of the paper products listed on the previous slide, buyers must purchase paper with 30% post-consumer content unless an exemption applies.
- Even with an exemption, paper products must always contain at least 20% post-consumer material. No exemptions are allowed for paper products below this minimum standard.
- As an alternative to the requirements above, buyers can purchase paper with a total recovered material content of 50% or more.

Purchasing Paper in Compliance with EO 13101 Requirements

- Buyers ordering from the General Services Administration (GSA) will automatically receive paper with 30% post-consumer materials.
- When purchasing paper products at local supply stores with the Purchase Card, *buyers* are responsible for knowing and following the APP requirements.

EO 13101 Requirements for Re-refined Oil

- Fleet and commodity managers are required to “take immediate steps” to procure re-refined oil:
 - DLA is a key player in procurement of re-refined oil, but other supply sources are also available.
 - AP requirements allow the purchase of biobased (e.g., vegetable) oils instead of re-refined oils; however, all use of biobased oils in AF vehicles must be approved by AF technical offices.
- If your shop uses engine oils, be sure they are using re-refined oil.

EO 13101 Requirements for Retread Tires

- Fleet and commodity managers are also required to “take immediate steps” to procure retread tires:
 - The program required by EO 13101 is administered by the Army Tank-automotive and Armaments Command (TACOM) for all DoD ground vehicles.
 - TACOM has an on-line catalog of retread tires, and also offers a list of certified tire retreaders that can provide closed-loop service to your base.
- If your shop buys tires for ground vehicles, check TACOM’s catalog to see if your tires are included.

CPG Updates

- At the time this course was being developed, the following products were being proposed for addition to the CPG list:
 - Bike racks
 - Modular threshold ramps
 - Office furniture
 - Rebuilt vehicular parts
 - Roofing materials
 - Cement and concrete containing cenospheres
 - Cement and concrete containing silica fume
 - Nylon carpet and nylon carpet backing
 - Blasting grit
 - Nonpressure pipe
 - Tires

Environmentally Preferable Purchasing (EPP)

- Recall from Lesson 1 that EPP encourages the purchase of products which have lesser or decreased effects on human health and the environment.
- AP *requires* the purchase of recycled-content products.
- EPP *encourages* the purchase of other products that minimize the impact to human health and the environment.
- AP also *requires* the purchase of biobased products. This requirement will take effect as soon as USDA publishes a product list.

What Makes a Product Environmentally Friendly?

- Less toxic
- Conserves energy or water
- Avoids ozone depletion or global warming
- Made with recycled materials

What Materials Should Be Favored to Encourage EPP?

- Post-consumer recycled content (required as part of APP).
 - Paper with 30% post-consumer content.
- Reusability/repairability.
 - Washable mugs instead of paper cups at coffee machines.
- Reduction in packaging.
 - Three-liter soda bottles instead of individual cans.
- Energy Efficiency.
 - Fluorescent bulbs instead of incandescent bulbs.

More Materials That Should Be Favored to Encourage EPP...

- Use of renewable energy sources.
 - Solar panels to power street lights.
- Biobased products.
 - Biobased motor oil.
- Biodegradability upon disposal.
 - Paper plates instead of styrofoam

What Types of Products Should We Avoid to Be More Environmentally Friendly?

- Some products, especially hazardous materials, have characteristics to avoid:
 - Paint with lead in it--the heavy metal can be toxic and cause mental deficiencies in children.
 - Aerosol cleaners--many contain ozone-depleting substances (ODSs).
 - Solvents with ingredients that are extremely flammable such as acetone.
 - Spray cleaners containing chemicals that cause air pollution and skin or breathing irritation. See the EPA Cleaning Products Wizard website to help select EPP cleaners

What are Ways That You Can Implement EPP?

- Buy products with recycled packaging.
- Buy products with reduced packaging material.
- Look for the Energy Star label.
- Ask if the product contains hazardous materials or toxic chemicals. Material Safety Data Sheets (MSDS) will provide this information.
- Look for other information about the environmental features of products.
- Be aware of spot checks that look for the purchase of CPG items-- Purchase Card Coordinators, Contracting Officers, and CE QAEs conduct spot checks of various purchases.

What is a “Resource Efficient Project”?

- Designing “resource efficient projects” at your installation is one way to implement EPP.
- Resource efficient projects make the best use of raw materials while still considering other environmental issues. For example:
 - Recycle construction and demolition debris whenever possible.
 - Specify carpet leasing programs that require manufacturers to “take back” used carpeting to be regenerated or recycled.
 - Use solar powered exterior lights. Indoors, use light bulbs and fixtures with lower energy consumption.

How Do You Implement Resource Efficient Projects?

- This concept expands beyond the strict requirements of AP into environmentally preferable products (EPP), and offers a proactive environmental approach to purchasing.
- The Reference section contains a document with some “tips” for resource efficient projects that will aid in full implementation of EPP at your installation.

Let's Review...

- CE support is essential for a successful AP program.
- Various parts of the CE organization have special roles with the APP, and contract QAEs are essential to keeping contracts in compliance with AP policy.
- CE must participate in all elements of the AP program, including preference, promotion, monitoring, and certification.
- Because CE is a major purchaser of items on the CPG list, CE personnel must become familiar with the items in the CPG and do their part to ensure the installation is in compliance with AP requirements.
- Project specifications and service contracts can be written to promote “environmentally friendly” and resource efficient practices.

LESSON #3B:

AP for Contracting, Supply and Transportation Personnel

What Types of Products and Services Does Logistics Buy?

- Building insulation
- Binders
- Ceiling tile
- Latex paint
- Tires
- Xerox Paper
- Toner Cartridge
- Drums

Lesson Overview

- Each function within logistics (LG) has an impact on the Affirmative Procurement Program (APP).
- Contracting officers are key to monitoring the APP and keeping the program in compliance.
- Supply personnel ensure that items purchased through the on-base supply system are in accordance with APP requirements.
- Government-wide Purchase Card users need to be educated in order to ensure their compliance with AP requirements.
- LG is required to participate in the base AP Team and plays a role in all four RCRA program elements.
- LG personnel should be aware of “environmentally friendly” product characteristics when buying items.

Learning Objectives

- When you have completed this module, you will be able to:
 - Identify LG roles and responsibilities in the scope of AP.
 - Identify ways LG personnel can implement each of the APP elements required to be included in the APP.
 - Identify FAR provisions and clauses that should be included in contracts.
 - Identify the consequences of noncompliance with AP requirements.
 - Identify how to document the use of AP exemptions.
 - Identify CPG items commonly used within LG.
 - Identify unique requirements for paper, re-refined lubricating oil, and retread tires.
 - Identify additional “environmentally friendly” product characteristics that you should consider when buying items.

Overall Scope of APP

- According to Executive Order (EO) 13101, Section 402, installations shall do the following:
 - Consider AP in planning for all procurement and contracts.
 - Establish AP programs using a cross-functional team.
 - Ensure that responsibilities are shared between program and procurement personnel.
 - Ensure that AP programs require 100% of purchases of guideline items to meet or exceed the EPA guideline unless an exemption is justified in writing.
 - For newly designated items, revise AP program within one year from the date of the EPA's final rulemaking.

AP Teamwork

- AP is not the responsibility of one particular group, but rather requires the wide-reaching support of many base personnel.
- The AP Team at each installation will decide the specific division of roles for implementation.
- The AP Policy Memo requires LG to participate fully in the AP Team.
- Team with environmental to train, educate, and monitor base personnel as they participate in the installation AP program.
- Within LG, there are three separate and distinct AP-related roles within the following organizations:
- LG Contracting (LGC) – LG Supply (LGS)
- LG Transportation/Maintenance (LGTM)
- Let's explore each of these roles...

What is the role of LGC?

- LGC is the first line of contact for all contracted operations.
- Contracting works to ensure that AP language and requirements are appropriately included in every contract.
- LGC inserts the appropriate FAR provisions and clauses in all construction *and* service contracts.
- LGC includes updated specifications provided by CE in all contracts that include AP products.
- LGC works with CEV to train all Purchase Card users to understand the requirements of AP.

What is the role of Contracting Officers?

- Contracting officers use the DD Form 350 to track and report APP progress.
- They make sure that APP is included in all acquisitions, including construction and service contracts and supplies for all types of funding, including non-appropriated fund (NAF) projects.
- Contracting officers insert FAR provisions and clauses that support AP into solicitations and contracts

What is the role of LGS?

- Supply ensures that whenever possible, the products they provide that are on the CPG list contain recycled material meeting EPA requirements.
- Because LGS orders many materials used throughout the installation, a comprehensive understanding of the AP requirements and the CPG items is essential.
- LGS is key to base-wide implementation of AP due to daily contact with CPG items.
- LGS must be aware of biobased product requirements and provide compliant products after USDA publishes its list.

Why Does LGTM Influence AP?

- Transportation has a particularly large role because of the use of CPG items on a daily basis.
- The following are examples of CPG items commonly used in transportation and maintenance:
 - Re-refined lubricating oil for maintaining fleet vehicles;
 - Retread tires for use on fleet vehicles;
 - Engine coolants; and
 - Sorbents for cleaning up any oil spills

How Can LGTM Be Involved?

- LGTM managers and shop superintendents must ensure that all personnel are familiar with AP requirements and the CPG items that affect their shops.
- When the Purchase Card is used, managers should stress the importance of purchasing CPG items.
- The EPA currently has a strong focus on transportation shop compliance with the AP requirements, which makes this area more vulnerable to possible NOV's.
- Implement biobased product requirements as soon as USDA publishes its product list.

AP Program Elements

- In general, LG supports the APP by adhering to the Resource Conservation and Recovery Act (RCRA) requirements and by following EO 13101.
- LG must team with CE in order to fully implement the RCRA requirements.
- Let's review the four RCRA elements...

Recall the four RCRA required elements...

1. **Preference Program**--indicates the installation's desire to use/purchase recycled content items (i.e., CPG items) over non-recycled content items.
2. **Promotion Program**--steps the installation takes to familiarize personnel with APP requirements.
3. **Vendor Estimates, Certification and Verification Program**--vendors identify items with recycled content, vendors certify the recycled content, the installation verifies the recycled content.
4. **Monitoring Program**--provides a means to review and evaluate the effectiveness of the APP on an annual basis.

Implementing the RCRA Preference Program through Contracts

- Check all contracts for inclusion of CPG items.
 - For example, require use of recycled-content trash bags in custodial contracts.
 - Remember to check both service and construction contracts.
- Be sure to include specified FAR provisions and clauses for AP compliance.
- Track the number of contracts that include CPG items using DD Form 350 (Individual Contracting Action Report).

How Do You Use the RCRA Promotion Program to Help Acquire CPG Items?

- The base can inform local vendors of APP requirements in order to encourage them to supply compliant items.
- Consider holding a “Vendor Day” in conjunction with other base organizations to promote the AP program.
 - During Earth Day activities, or at other pertinent times, invite vendors to base to display products that are CPG compliant.
- Develop a list of vendors who support the installation’s APP and share with other organizations through the AP Team.

How Does Contracting Support the Promotion Program?

- Contracting officers help CE project managers include AP requirements in contracts:
 - Check to see if CPG items are included when completing the DD Form 350.
 - Include FAR Provision 52.223-4 in all contracts that contain AP items, and also include FAR Clause 52.223-9 if these contracts are over the “simplified acquisition threshold” of \$100,000.

How Do You Implement RCRA's Vendor Estimates, Certification, and Verification Program?

- This RCRA element is only required for purchases over the “simplified acquisition threshold” of \$100,000.
- When FAR Clause 52.223-9 is included, vendors estimate and certify the amount of recycled material that will be included in a product. Alternate 1 to this clause requires certifications.
 - The amount of recycled-content material in the product must comply with the EPA guidelines.
 - The CE project manager reviews vendor submittals to verify their performance.
 - Contracting officers use Alternate 1 only when requested in writing by the technical project manager.

Certification Statement

- Vendors certify that the percentage of recovered content used in the performance of the contract meets EPA guidelines.
- The certification must be in the form of a product label or an attached statement to the bid documents. The contract clause reads as follows:
- “I, _____ (name of certifier), am an officer or employee responsible for the performance of this contract and hereby certify that the percentage of recovered material content for EPA-designated products met the applicable contract specifications.”

[Signature of the Officer or Employee]

Verification Process

- After product delivery, the project manager must *verify* that the estimates and certifications were accurate and complete as called for in the specifications.
- CE QAEs will also look at the actual labels on products that are delivered to the site or used by contractors.
 - The purpose of this review is to check that the contractor followed through and met the recycled-content requirements in the project specifications.

The FAR Provisions and Clauses

- Subpart 23.4
 - 23.405(b): refer to EPA CPG list and to APP when purchasing supplies or services involving a designated item.
 - 23.405(c): put written exemptions in contract file and give to the agency Environmental Executive.
 - 23.406(a): Insert the provision at 52.223-4, Recovered Material Certification, in solicitations involving recovered materials.
 - 23.406(b): Insert the clause 52.223-9, Estimate of Percentage of Recovered Material Content for EPA-Designated Products, in solicitations and contracts exceeding \$100,000 that include provision 52.223-4. Use Alternate 1 when requested by the technical project manager.

What Does the AP FAR Provision Say?

- The FAR provision listed below should be included in all contracts.

FAR 52.223-4:

As required by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6962(c)(3)(A)(i)), the offeror certifies, by signing this offer, that the percentage of recovered materials to be used in the performance of the contract will be at least the amount required by the applicable contract specifications.

What Does the AP FAR Clause Say?

- The FAR clause listed below should be included in all contracts over \$100,000.
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- (1) Estimate the percentage of the total recovered material used in contract performance, including, if applicable, the percentage of post-consumer material content; and
- (2) Submit this estimate to _____
[Contracting Officer complete in accordance with agency procedures].

Alternate 1 to this clause requires vendor certification. Contracting officers use Alternate 1 if the project manager advises (in writing) that the estimate can be verified.

Additional FAR Provisions and Clauses

- Subpart 23.7
 - 23.704: Include provisions that obligate contractors to comply with the requirements of EO 13101; compliance includes developing programs to promote and implement cost-effective waste reduction and AP.
 - 23.705: Insert the clause 52.223-10, Waste Reduction Program, in all solicitations and contracts for contractor operation of Government-owned or -leased facilities and all solicitations and contracts for support services at Government-owned or -operated facilities.

Other FAR Provisions and Clauses

- Subpart 4.3: Contractors should use recycled-content paper and print documents double-sided.
- Part 11: Requires agencies to consider use of recovered material, the Environmentally Preferable Purchasing (EPP) criteria developed by EPA, and environmental objectives in specifications, requirements for supplies and services, and source selection factors.
- Part 36: Requires attention to environmental concerns in the architectural-engineer selection process and work that is performed by chosen A-E firm.

How is AP Monitoring Accomplished?

- Monitoring has two distinct parts--internal and external.
- Internal monitoring is the responsibility of all organizations represented on the AP Team:
 - LG Contracting is responsible for tracking contract compliance using the DD Form 350.
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Internal Monitoring (continued)

- Individual organizations need to monitor their own activities to ensure they are meeting requirements and carrying out the actions in the base AP Plan.
- MAJCOMs also monitor compliance through the ECAMP and ESOHCAMP.

What are Purchase Card Coordinator Responsibilities Within the Monitoring Program?

- Work with CEV to include AP information in the training given to Purchase Card users.
 - Ensure that cardholders can demonstrate knowledge about:
 - Legal requirements;
 - What products are affected;
 - Exemption policies;
 - Program benefits;
 - Applicability to purchases/central supply; and
 - Thresholds for written determinations.
- A fact sheet or brochure can be provided for future reference.

What are Additional Purchase Card Coordinator Responsibilities within the RCRA Monitoring Program?

- Make AP part of the surveillance required by AFI 64-117, “Air Force Government-Wide Purchase Card Program”
 - Review a sampling of actual purchases to make sure cardholders are aware of requirements and are implementing APP.
 - Written determinations are required for purchases over \$2,500 (or \$2,000 for construction items) that did not meet CPG requirements.
- Billing officials (usually the card holder’s supervisor) are also required to perform surveillance, and should include AP in their reviews.

How Are Purchases Through Central Supply Agencies (CSAs) Monitored?

- Purchases made through a Central Supply Agency (CSA) do not require tracking by installation personnel.
-
- The following agencies and organizations track and report CPG item purchases directly:
 - General Services Administration (GSA)
 - Defense Logistics Agency (DLA)
 - Government Printing Office (GPO)
 - Federal Logistics Information System (FLIS)
 - Javits-Wagner-O'Day (JWOD) Catalog
 - UNICOR

External Monitoring

- External assessments and inspections:
 - AP compliance is evaluated during EPA and state compliance inspections--an installation can receive a notice of violation (NOV) for deficiencies.
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 - The product costs more than a comparable product made of virgin materials.
 - The product is not competitively available within a reasonable period of time.

When Do You Have to Document That You Have Used an Exemption?

- Written documentation of your decision to buy a non-compliant CPG item, based on one of the exemptions, is required for all purchases over \$2500 (\$2000 for construction). This includes purchases made with Government Purchase Cards.
- No written documentation is needed for smaller purchases.
- ALL purchases, including GPC purchases MUST meet EPA recycled-content requirements unless an exemption applies.

Who Does the Paperwork?

- You must keep some sort of documentation to explain the reason for the exemption: price, technical requirements, availability.
- Your AP Team will designate the format to be used.
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 - There is no longer a requirement for Commander's signature on the form.
 - The completed form goes in the contract file or the purchaser's records.
- Documentation helps prove to inspectors and auditors that you considered AP in your purchasing process.

Recall the Types of Products and Services that Logistics Buys...

- Building insulation
- Binders
- Ceiling tile
- Latex paint
- Tires
- Xerox Paper
- Toner Cartridge
- Drums

Understanding EPA's Requirements

- The EPA CPG web site has tables that show how much “recovered material” needs to be in each CPG item.
 - For the APP, “recovered material” means the same thing as “recycled material”.
 - Some items have a “total recovered material” requirement.
 - Some items have a “post-consumer recovered material” requirement.
 - Some items have both kinds of requirements.

An Example of EPA's Requirements

- EPA's Recovered Materials Content Levels for Office Recycling Containers and Office Waste Receptacles

Materials	Post Consumer Content %	Total Recovered Materials Content %
Plastic	20-100	---
Steel	16	25-30
Corrugated	25-50	25-50
Solid Fiber Boxes	40	---
Industrial Paperboard	40-80	100

CPG Categories

- Determine which categories below apply to your shop/work area.
 - Construction Products
 - Landscaping Products
 - Non-paper office products
 - Paper and paper products
 - Park and recreation products
 - Transportation products
 - Vehicular products
 - Miscellaneous products

Special Requirements for Certain CPG Items

- Because the federal government has a large number of fleet vehicles and consumes a vast amount of paper, the following CPG items have special emphasis in EO 13101:
 - Paper,
 - Re-refined oil, and
 - Retread tires.
- Let's take a look at these items and the special requirements for each.

Special Requirements for Paper

- When you buy any of these items:
 - high speed copier paper
 - forms bonds
 - carbonless paper
 - white wove envelopes
 - book paper
 - cover stock
 - offset paper
 - computer printout paper
 - cotton fiber paper
 - writing and office paper
 - file folders

the special requirements in EO 13101 apply.

Purchasing Paper in Compliance with EO 13101 Requirements

- For all of the paper products listed on the previous slide, buyers must purchase paper with 30% post-consumer content unless an exemption applies.
- Even with an exemption, paper products must always contain at least 20% post-consumer material. No exemptions are allowed for paper products below this minimum standard.
- As an alternative to the requirements above, buyers can purchase paper with a total recovered material content of 50% or more.

Purchasing Paper in Compliance with EO 13101 Requirements

- Buyers ordering from the General Services Administration (GSA) will automatically receive paper with 30% post-consumer materials.
- Remember to use JWOD when required -- they provide many products that comply with EPA requirements.
- When purchasing paper products at local supply stores with the Purchase Card, *buyers* are responsible for knowing and following the APP requirements.

EO 13101 Requirements for Re-refined Oil

- Fleet and commodity managers are required to “take immediate steps” to procure re-refined oil:
 - DLA is a key player in procurement of re-refined oil, but other supply sources are also available.
 - AP requirements allow the purchase of biobased (e.g., vegetable) oils instead of re-refined oils; however, all use of biobased oils in AF vehicles must be approved by AF technical offices.
- If your shop uses engine oils, be sure they are using re-refined oil.

EO 13101 Requirements for Retread Tires

- Fleet and commodity managers are also required to “take immediate steps” to procure retread tires:
 - The program required by EO 13101 is administered by the Army Tank-automotive and Armaments Command (TACOM) for all DoD ground vehicles.
 - TACOM has an on-line catalog of retread tires, and also offers a list of certified tire retreaders that can provide closed-loop service to your base.
- If your shop buys tires for ground vehicles, check TACOM’s catalog to see if your tires are included.

CPG Updates

- At the time this course was being developed, the following products were being proposed for addition to the CPG list:
 - Bike racks
 - Modular threshold ramps
 - Office furniture
 - Rebuilt vehicular parts
 - Roofing materials
 - Cement and concrete containing cenospheres
 - Cement and concrete containing silica fume
 - Nylon carpet and nylon carpet backing
 - Blasting grit
 - Nonpressure pipe
 - Tires

Environmentally Preferable Purchasing (EPP)

- Recall from Lesson 1 that EPP encourages the purchase of products which have lesser or decreased effects on human health and the environment.
- AP *requires* the purchase of recycled-content products.
- EPP *encourages* the purchase of other products that minimize the impact to human health and the environment.
- AP also *requires* the purchase of biobased products. This requirement will take effect as soon as USDA publishes a product list.

What Makes a Product Environmentally Friendly?

- Less toxic
- Conserves energy or water
- Avoids ozone depletion or global warming
- Made with recycled materials

What Materials Should Be Favored to Encourage EPP?

- Post-consumer recycled content (required as part of APP).
 - Paper with 30% post-consumer content.
- Reusability/repairability.
 - Washable mugs instead of paper cups at coffee machines.
- Reduction in packaging.
 - Three-liter soda bottles instead of individual cans.
- Energy Efficiency.
 - Fluorescent bulbs instead of incandescent bulbs.

More Materials That Should Be Favored to Encourage EPP...

- Use of renewable energy sources.
 - Solar panels to power street lights.
- Biobased products.
 - Biobased motor oil.
- Biodegradability upon disposal.
 - Paper plates instead of styrofoam

What Types of Products Should We Avoid to Be More Environmentally Friendly?

- Some products, especially hazardous materials, have characteristics to avoid:
 - Paint with lead in it--the heavy metal can be toxic and cause mental deficiencies in children.
 - Aerosol cleaners--many contain ozone-depleting substances (ODSs).
 - Solvents with ingredients that are extremely flammable such as acetone.
 - Spray cleaners containing chemicals that cause air pollution and skin or breathing irritation. See the EPA Cleaning Products Wizard website to help select EPP cleaners.

What are Ways That You Can Implement EPP?

- Buy products with recycled packaging.
- Buy products with reduced packaging material.
- Look for the Energy Star label.
- Ask if the product contains hazardous materials or toxic chemicals. Material Safety Data Sheets (MSDS) will provide this information.
- Look for other information about the environmental features of products.
- Be aware of spot checks that look for the purchase of CPG items-- Purchase Card Coordinators, Contracting Officers, and CE QAEs conduct spot checks of various purchases.

Let's Review...

- LG Support is essential for a successful AP program.
- Contracting is a key member of the AP Team and participation is required by the Air Force AP Policy Memo.
- Contracting Officers are essential to keeping contracts in compliance with AP policy, and tracking AP success using the DD Form 350.
- Ensure a successful AP program by helping implement RCRA required elements and understanding CPG items.
- Educate and review performance of Purchase Card users in order to ensure their compliance with AP requirements.
- You can help avoid environmental and health problems by purchasing other types of environmentally preferable products as part of the AP program.

LESSON #3C:

AP for Maintenance, Administrative and Support Personnel

What Types of Products and Services Do Air Force Shops Buy and Use?

- Absorbent sheets
- Antifreeze Recycler
- Traffic Cones
- Garden Hoses

Lesson Overview

- Each function at an installation has an impact on the Affirmative Procurement Program (APP), because everyone on base purchases at least one of the items on the Comprehensive Procurement Guideline (CPG) list.
- Your support and participation is very important for a successful AP program.
- When you use the Government-wide Purchase Card, it is important that you follow AP guidelines.
- You can also help the installation to implement environmentally preferable purchasing (EPP) as part of the AP program.

Learning Objectives

- When you have completed this module, you will be able to:
 - Identify your responsibilities in the AP program.
 - Identify what CPG items can be purchased for your shop.
 - Identify unique requirements for paper, re-refined oil, and retread tires.
 - Identify how to document the use of AP exemptions.
 - Identify the consequences of noncompliance with AP requirements.
 - Identify additional “environmentally friendly” product characteristics that you should consider when buying items for your shop.

AP Teamwork

- AP is not the responsibility of one particular group, but rather requires the support of many base personnel.
- The AP Team at each installation will decide the specific division of roles for implementation.
- Everyone who orders or buys products needs to understand and follow EPA requirements regarding the base APP.
- Purchasers must follow APP requirements so the base does not receive a Notice of Violation (NOV).

What Are Your Responsibilities in APP?

- Your support at the shop level is very important because only you know what types of products you buy, and your buying decisions can help support the AP program.
- It is your responsibility to:
 - Check to see which products you buy are covered under the AP program--they are known as “CPG items.”
 - Know the EPA requirements for the CPG items that you buy.
 - Buy products that meet the EPA requirements--unless an exemption applies.

Where Are CPG Items Used?

- Admin Facilities: printing and writing paper, folders, envelopes, binders, clipboards, toner cartridges, desk accessories, trash cans
- Housing: playgrounds, outdoor furniture
- Shops: engine coolants, engine oil, retread tires, traffic cones, barricades, parking stops, sorbents, pallets
- Construction: insulation, carpet, latex paint, fiberboard, restroom partitions, concrete, mulch, plastic safety fencing
- Custodial Contracts: trash bags, sanitary tissue products
- Grounds Maintenance: compost, mulch, garden hoses, garden edging, landscaping timbers
- Reproduction Contracts: paper & toner cartridges

How Do You Get These Items?

- Standard Base Supply System (SBSS)
- Other Base Supply Systems
- On-base Supply Store
- Local Vendors (through Purchase Card)
- General Services Administration (GSA)
- Defense Logistics Agency (DLA)
- Government Printing Office (GPO)
- Federal Logistics Information System (FLIS)
- Javits-Wagner-O'Day (JWOD) Catalog
- UNICOR

Why Are Purchase Card Purchases So Important to You?

- Most of the supply sources listed on the previous slide already have systems in place to select recycled-content products. In some cases, you simply provide a stock number and the system orders a CPG item.
- This is not so for purchases made with the Purchase Card. In this case, YOU make the decision on choosing what particular product to buy and it is your responsibility to know about the CPG items and to select them when they are available.
- The bottom line is, buy products made of recycled-content materials whenever you can!!!

How Can the CPG List Help You?

- The CPG list contains the requirements for the percentage of post-consumer content and the percentage of total recovered materials content that certain products must contain.
- The most up-to-date list of CPG items is on EPA's website.
- You can go to the EPA web site and print out the lists that apply to your operations. Posting them in your work area helps to remind everyone about AP requirements.

More On the CPG...

- The CPG list has over 50 products listed in 8 categories and EPA Fact Sheets are available for each category. (Links to the fact sheets are included in the Reference section.)
- EPA adds products to the list every 2 years.
- Products that EPA is proposing to add to the CPG are shown on their web site along with the current list of guideline items.
- Installations need to include all new items in their AP programs within one year of EPA's adding it to the list.

Exemptions to Purchasing CPG Items

- Sometimes purchasing a CPG item may be impossible.
- Recall that RCRA contains the following exemptions from buying CPG items:
 - The product does not meet reasonable technical requirements.
 - The product costs more than a comparable product made of virgin materials.
 - The product is not competitively available within a reasonable period of time.

Who Does the Paperwork?

- You must keep some sort of documentation to explain the reason for the exemption: price, technical requirements, availability.
- Your AP Team will designate the format to be used.
- The purchaser or project manager fills out the exemption determination:
 - There is no longer a requirement for Commander's signature on the form.
 - The completed form goes in the contract file or the purchaser's records.
- Documentation helps prove to inspectors and auditors that you considered AP in your purchasing process.

Recall the Types of Products and Services That Shops Use and Buy...

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- Antifreeze Recycler
- Traffic Cones
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 - Nylon carpet and nylon carpet backing
 - Blasting grit
 - Nonpressure pipe
 - Tires

How Does the Air Force Monitor AP Program Compliance?

- LG Contracting is responsible for tracking contract purchases.
- The Purchase Card Program Coordinator and billing officials conduct audits of credit card purchases.
- CEV monitors AP training and recycling metrics, and helps coordinate ECAMP visits on base.
- Individual organizations are required to monitor their own activities to ensure that they are meeting requirements and carrying out the actions in the base AP Plan.
- MAJCOMs monitor compliance through the ECAMP and ESOHCAMP.

How does the EPA Monitor AP Program Compliance?

- AP compliance is evaluated during EPA and state compliance inspections-- an installation can receive a notice of violation (NOV) for deficiencies.
- EPA will use a questionnaire to review the basewide AP program, and will also visit vehicle maintenance shops to inspect for AP compliance.
- Recall the special requirements for re-refined oil and retread tires- these will be a focus of EPA during visits to vehicle maintenance shops.

Environmentally Preferable Purchasing (EPP)

- Recall from Lesson 1 that EPP encourages the purchase of products which have lesser or decreased effects on human health and the environment.
- AP *requires* the purchase of recycled-content products.
- EPP *encourages* the purchase of other products that minimize the impact to human health and the environment.
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- What Makes a Product Environmentally Friendly?
- Less toxic
- Conserves energy or water
- Avoids ozone depletion or global warming
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What Materials Should Be Favored to Encourage EPP?

- Post-consumer recycled content (required as part of APP).
 - Paper with 30% post-consumer content.
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- Reduction in packaging.
 - Three-liter soda bottles instead of individual cans.
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More Materials That Should Be Favored to Encourage EPP...

- Use of renewable energy sources.
 - Solar panels to power street lights.
- Biobased products.
 - Biobased motor oil.
- Biodegradability upon disposal.
 - Paper plates instead of styrofoam

What Types of Products Should We Avoid to Be More Environmentally Friendly?

- Some products, especially hazardous materials, have characteristics to avoid:
 - Paint with lead in it--the heavy metal can be toxic and cause mental deficiencies in children.
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 - Solvents with ingredients that are extremely flammable such as acetone.
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What are Ways That You Can Implement EPP?

- Buy products with recycled packaging.
- Buy products with reduced packaging material.
- Look for the Energy Star label.
- Ask if the product contains hazardous materials or toxic chemicals. Material Safety Data Sheets (MSDS) will provide this information.
- Look for other information about the environmental features of products.
- Be aware of spot checks that look for the purchase of CPG items-- Purchase Card Coordinators, Contracting Officers, and CE QAEs conduct spot checks of various purchases.

Let's Review...

- Your support is necessary for an effective AP program.
- Become familiar with the items on the CPG list that you purchase in your shop. Make sure all CPG purchases, including credit card purchases, follow the AP guidelines.
- The EPA and other inspectors can review your operations to check compliance with AP requirements. The goal is “No NOVs”!
- You can help avoid environmental and health problems by purchasing other types of environmentally preferable products as part of the AP program.
- Once the biobased product list is published, you will need to follow USDA guidelines also. Your installation AP Team will inform everyone when that time comes.

Glossary

The terms included in this Glossary are related to AP requirements and program management. Technical terms related to the individual guideline items are defined in EPA's Buy-Recycled Series Fact Sheets, and are not repeated here.

A-E - Architectural-Engineer

AAFES - Army-Air Force Exchange Service

Acquisition - acquiring by contract, using appropriated funds, supplies or services (including construction) by and for the use of the federal government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, or demonstrated and evaluated. Acquisition begins when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation, selection of sources, award of contracts, contract financing, contract performance, contract administration, and those technical and management functions directly related to the process of fulfilling agency needs by contract. [Executive Order 13101]

AF - Air Force

AFB - Air Force Base

AFCEE - Air Force Center for Environmental Excellence

Affirmative Procurement (AP) Program - a program assuring guideline items composed of recovered materials will be purchased to the maximum extent practicable, consistent with federal law and procurement regulations. [RCRA]

AFI - Air Force Instruction

AFRC - Air Force Reserve Command

AGE - Aerospace Ground Equipment

ARB - Air Reserve Base

ASTM - American Society for Testing and Materials

Billing Official - The official appointed in writing by the organizational commander who is responsible for the oversight of one or more cardholders.

Biobased product - a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials. [Executive Order 13101]

BPL - Biobased Products List

Case-by-Case Procurement - specification of different (usually lower) minimum content standards for specific singular procurement actions when a procuring agency is unable to acquire an item which complies with RCRA or DoD federal procurement requirements. Content standards may be changed if the agency determines it consistently can not procure the designated item using the standards previously established.

CCB - Construction Criteria Base

CEC- Civil Engineering Division. CEC manages the design and construction of facility projects that are accomplished by contract.

CE - Civil Engineering

Cenospheres - Cenospheres are inexpensive hollow ceramic microspheres with unique properties which make them ideal for a wide variety of applications - especially those requiring high strength, light weight fillers.

Central Supply Agencies - General Services Administration (GSA), Defense Logistics Agency (DLA), Government Printing Office (GPO), Federal Logistics Information System (FLIS), Onbase Supply Store, JWOD, UNICOR

CEO- Civil Engineering Operations. Completes construction work orders, and manages service contracts.

Certification - provided by offerors/bidders/vendors, it is written documentation certifying the percentage of recovered materials contained in products or to be used in the performance of the contract is at least the amount required by applicable specifications or other contractual requirements. Certification on multi-component or multi-material products should verify the percentage of postconsumer waste and recycled material contained in the major constituents of the product.

CEQ - Council on Environmental Quality

CEV- Civil Engineering Environmental. Manages environmental programs including the APP.

CFCs – Chlorofluorocarbons

CFR - Code of Federal Regulations

COCESS - Contractor Operated Civil Engineer Support Services

Comprehensive Procurement Guidelines (CPG) - the documents in which EPA officially designates the specific recycled-content products to be included in AP programs. Products designated in the CPG are often referred to as "guideline items." The CPG requirements are codified in 40 CFR Part 247.

CONUS - the continental US, Alaska, Hawaii, and territories/possessions.

Cost-Effective Procurement Preference Program - a procurement program favoring more environmentally-sound or energy-efficient products and services than other competing products and services, where price and other factors are equal. [OFPP Policy Letter 92-4]

CRBT - Center for Resourceful Building Technology

CSI - Construction Standards Institute

DAPS - Defense Automated Printing Services

DFARS - DoD Supplement to the Federal Acquisition Regulation

DLA - Defense Logistics Agency

DoD (or DD) - Department of Defense

DRMO - Defense Reutilization and Marketing Office

EA - Enforcement Action

EO - Executive Order

EPA - Environmental Protection Agency

EPC/ESOHC - multifunctional team on base that implements and develops environmental programs

Environmentally Preferable - products or services having a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service. [Executive Order 13101]

EO - Executive Order

EPP - Environmentally preferable purchasing

Environmentally Sound - a product or service less damaging to the environment when used, maintained, and disposed of in comparison to a competing product or service. [OFPP Policy Letter 92-4]

ECAMP/ESOH CAMP - Environmental, Safety, and Occupational Health Compliance Assessment and Management Program

EPC/ESOHC- Environmental Protection Committee/Environment, Safety, and Occupational Health Committee

ETL - Engineering Technical Letter

Executive Agency or Agency - an Executive agency as defined in 5 U.S.C 105. For the purpose of this order, military departments, as defined in 5 U.S.C. 102, are covered under the auspices of the Department of Defense. [Executive Order 13101]

Exemption - when CPG product purchases do not meet specified criteria, a waiver from AP requirements will be granted.

FAR - Federal Acquisition Regulation

Federal Supply Source - any supply source managed by a federal agency such as the General Services Administration, Government Printing Office, or Defense General Supply Center.

FEE - Federal Environmental Executive

FLIS - Federal Logistics Information System

GWPC-Government-wide Purchase Card- A commercial purchase card provided to military and federal civilian employees for official government purchases of authorized supplies, equipment, and non-personal services up to the micropurchase threshold (\$2,500 as of 6 Dec 00).

GPO - Government Printing Office

GSA - General Services Administration

HQ USAF- Headquarters United States Air Force

Installation - In the Air Force, a self-supporting center of operations for actions of importance to Air Force combat, combat support, or training. It is operated by an active, reserve, or guard unit of group size or larger with all land, facilities, and organic support needed to accomplish the unit mission. It must have real property accountability through ownership, lease, permit, or other written agreement. Agreements with foreign governments that give the Air Force jurisdiction over real property meet this requirement. The term "installation" includes Air Force bases, Field Operating Agencies, Air Force Reserve bases, and Air National Guard bases.

JA - Judge Advocate

JWOD - Javits-Wagner-O'Day Catalog

LEED - Leadership in Energy and Environmental Design

LGC - Logistics Contracting

LGS - Logistics Supply

Life-Cycle Assessment - the comprehensive examination of a product's environmental and economic aspects and potential impacts throughout its lifetime, including raw material extraction, transportation, manufacturing, use, and disposal. [Executive Order 13101]

Life-Cycle Cost - the amortized annual cost of a product, including capital costs, installation costs, operating costs, maintenance costs, and disposal costs discounted over the lifetime of the product. [Executive Order 13101]

MAJCOM - Major Command

MSDS- Material Safety Data Sheet

Micropurchase - an acquisition of supplies or services (except construction), the aggregate amount of which does not exceed \$2,500, except that in the case of construction, the limit is \$2,000. [FAR 2.1, Definitions]

Minimum Content Standard - the minimum recovered material content specifications set to assure the recovered material content required is the maximum available without jeopardizing the intended item end use or violating the limitations of the minimum content standards set forth by EPA's guidelines. [RCRA, 42 U.S.C. 6962]

MWR - Morale, Welfare, and Recreation

Non-appropriated funds (NAF) activities - funds that do not come from tax dollars and that are not allocated through the DoD budget cycle or system; also, funds generated through sales or rentals of products or services at an installation (typically MWR)

NOV - Notice of Violation

NRC - National Recycling Coalition

OCONUS - Outside Continental United States

OFEE - Office of the Federal Environmental Executive

OFPP - Office of Federal Procurement Policy

PA - Public Affairs

PET- Polyethylene Terephthalate

P2- Pollution Prevention

Postconsumer Material - a material or finished product that has served its intended use and has been diverted or recovered from waste destined for disposal, having completed its life as a consumer item. Postconsumer material is a part of the broader category of recovered materials. Postconsumer recovered materials, for purposes of purchasing paper and paper products, is a subset of the broader term "recovered materials", and means: (1) Paper, paperboard and fibrous wastes

from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item including: Used corrugated boxes; old newspapers; old magazines; mixed waste paper; tabulating cards, and used cordage; and (2) All paper, paperboard, and fibrous wastes that enter and are collected from municipal solid waste. [RMAN I]

PM - Project Manager

Preconsumer Materials - Materials generated in manufacturing and converting processes, such as manufacturing scrap and trimmings/cuttings. Preconsumer materials, along with postconsumer materials, are part of the broader category of "recovered materials." [Glossary on EPA's CPG Website]

Preference - when two products or services are equal in performance characteristics and price, the Government, in making purchasing decisions, will favor the more environmentally-sound or energy-efficient product. [OFPP Policy Letter 92-4]

Procuring Agency - any federal agency, or any State agency or agency of a political subdivision of a State, which is using appropriated federal funds for such procurement, or any person contracting with any such agency with respect to work performed under such contract. [RMAN I]

PWS - Performance Work Statement

QAE - Quality Assurance Evaluator

RCRA - Resource Conservation and Recovery Act, 42 U.S.C. 6901, et. seq., as amended

Recovered Materials - waste materials and byproducts which have been recovered or diverted from solid waste, but such term does not include those materials and byproducts generated from, and commonly reused within, an original manufacturing process. [Executive Order 13101]

Recovered Materials Advisory Notices (RMAN) - an EPA document that accompanies each of the Comprehensive Procurement Guidelines. The RMANs recommend recycled-content ranges for products designated in the CPG, based on current information on commercially available recycled-content products. Per AFI 32-7080, these recommended content ranges are mandatory for all Air Force acquisitions of CPG products, unless an exemption applies.

Recyclability - the ability of a product or material to be recovered from, or otherwise diverted from, the solid waste stream for the purpose of recycling. [Executive Order 13101]

Recycled Material - a material utilized in place of raw or virgin material in product manufacturing consisting of materials derived from postconsumer waste, industrial scrap, material derived from agricultural wastes, and other items, all of which can be used in new product manufacture. [OFPP Policy Letter 92-4]

Recycling - the series of activities, including collection, separation, and processing, by which products or other materials are recovered from the solid waste stream for use in the form of raw materials in the manufacture of new products other than fuel for producing heat or power by combustion. [Executive Order 13101]

SE – Safety

SG - Surgeon General

Specification - a description of the technical requirements for a material, product, or service that includes the criteria for determining whether these requirements are met. In general, specifications are in the form of written commercial designations, industry standards, and other descriptive references. [CPG I]

SOW - Statement of Work

TACOM - Tank-automotive and Armaments Command (US Army)

Unreasonable Price - The price of a recycled-content product is considered unreasonable if it exceeds the cost of a comparable non-recycled item.

USDA - United States Department of Agriculture

Verification - procedures used by procuring agencies to confirm both vendor estimates and certifications of the percentages of recovered material to be used in the performance of a contract, or contained in the products supplied to them.

Virgin Material - a mined or harvested raw material to be used in manufacturing.

VOCs - Volatile Organic Compounds

Waste Prevention - any change in the design, manufacturing, purchase, or use of materials or products (including packaging) to reduce their amount or toxicity before they are discarded. Waste prevention also refers to the reuse of products or materials. [Executive Order 13101]

Waste Reduction - preventing or decreasing the amount of waste being generated through waste prevention, recycling, or purchasing recycled and environmentally preferable products. [Executive Order 13101]

Reference

This reference area provides links to fact sheets and useful web sites having to do with AP requirements and AP program management.

AFCEE AP Program Web page-

<http://www.afcee.brooks.af.mil/eq/programs/progpage.asp?rbox=False&type=program&groupcode=0&progid=1>

RCRA Section 6002-

<http://www4.law.cornell.edu/uscode/unframed/42/6962.html>

EO 13101- <https://www.denix.osd.mil/denix/Public/Legislation/EO/note45.html>

AF Policy Memo- <http://www.afcee.brooks.af.mil/eq/ap/appolicy.pdf>

ETL 00-1-<http://www.afcee.brooks.af.mil/eq/ap/ETL00-1.pdf>

40 CFR 247-http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr247_01.html

EPA CPG Website- <http://www.epa.gov/cpg>

General Services Administration (GSA)- <http://www.fss.gsa.gov/envIRON/>

Defense Logistics Agency (DLA)- <http://www.dscr.dla.mil/catalogs/catalog.htm>

Government Printing Office (GPO)- <http://www.gpo.gov>

JWOD- <http://www.jwod.gov>

UNICOR- <http://www.unicor.gov>

Recovered materials determination form-

<http://www.afcee.brooks.af.mil/eq/ap/gg/default.asp>

Recycled Products Purchasing Cooperative- <http://www.recycledproducts.org>

Construction products fact sheet- <http://www.epa.gov/cpg/pdf/const-00.pdf>

Landscaping products fact sheet- <http://www.epa.gov/cpg/pdf/lands-00.pdf>

Non-paper office products fact sheet-
<http://www.epa.gov/cpg/pdf/nonpap00.pdf>

Paper and paper products fact sheet- <http://www.epa.gov/cpg/pdf/paper-00.pdf>

Park and recreation products fact sheet- <http://www.epa.gov/cpg/pdf/parks-00.pdf>

Vehicular products fact sheet- <http://www.epa.gov/cpg/pdf/vehi-00.pdf>

Transportation products fact sheet- <http://www.epa.gov/cpg/pdf/trans-00.pdf>

Miscellaneous products fact sheet- <http://www.epa.gov/cpg/pdf/micl-00.pdf>

USDA Biobased Products Listing- <http://www.usda-biobasedproducts.net/public>

Army and Navy Specs- <http://www.ccb.org/ufgs/ufgs.htm>

Appendix C of the EPA Guidance-
<http://www.epa.gov/opptintr/epp/pdfs/finaleppguidance.pdf>
<http://www.epa.gov/opptintr/epp/guidancepage.htm>

Sample AP Plans-
<http://www.afcee.brooks.af.mil/eq/programs/progpage.asp?rbox=False&type=program&groupcode=0&progid=1>

EO 13101 Paper Requirements-
<http://www.denix.osd.mil/denix/Public/Legislation/EO/note45.html>

EO 13101 Re-refined Oil Requirements-

<http://www.denix.osd.mil/denix/Public/Legislation/EO/note45.html>

EO 13101 Retread Tire Requirements-

<http://www.denix.osd.mil/denix/Public/Legislation/EO/note45.html>

TACOM- <http://www.tacom.army.mil/immc/Support/Teamtire/home1.htm>

EPA Cleaning Products Wizard-

<http://www.epa.gov/opptintr/epp/cleaners/select/>