

Contracting Without Full and Open Competition

Justification and Approvals

FAR 6.302-1 Only One Responsible Source

1. **Agency:** Office of Water (OW), Office of Ground Water and Drinking Water (OGWDW), Water Security Division (WSD)

Contracting Activity: US EPA, Office of Acquisition Management, Cincinnati Procurement Operations Division

Requisition No.:

Contractor: CSC
6101 Stevenson Avenue
Alexandria, VA 22304

2. **Nature and/or description of the action:** The Office of Water, Water Security Division, requires an increase in the ceiling capacity of Contract EP-C-05-045 during Option Period 4 in an amount of 20,000 LOE [REDACTED]. Currently, all quantity options on the contract are exercised, resulting in a current available 100,000 LOE, with a current maximum cost ceiling [REDACTED]. The requested increase would result in a revised maximum LOE of 120,000 and a revised maximum cost ceiling [REDACTED]. The requested dollar value is based on an estimated \$/hr of [REDACTED], which is consistent with the current cost of contractor services for similar requirements during Option Period 4 and is consistent with the bid price for this option period of the contractor's original RFP submission [REDACTED]. Four months remain on the current contract, and the contracting office has issued the RFP for the follow-on contract, with proposals due April 12, 2010. The follow-on contract is expected to be awarded by July 31, 2010. The requested increase is to satisfy increased demand by the Agency for the required services during the last four months of contract performance, beyond what was anticipated at contract award five years ago. Without this increase, the final four months of the contract will not have capacity to perform necessary and critical requirements. This increase will provide us with the necessary capacity to continue ongoing water security-related services for a short interim period until a new contract is awarded. Increasing the capacity of the contract by this amount will put the ceiling of the contract for Option Period 4 in line with the actual utilized contract levels in two of the previous four contract periods. The contract had originally been solicited and awarded with a bell curve expectation (ramping up in base period, straight line in next three periods, and ramping down in final period), but subsequent events, some of which were unforeseen at time of award have demonstrated that the contract should have been structured with consistent contract capacity in each of the option quantities. Option Period 4 is the final period on the contract. Two basic issues are supporting the rationale for proceeding on a sole source basis for the increment of capacity:

- a) Evolving unanticipated needs related to critical aspects of national security have necessitated an increase in the contract ceiling to provide continued support for ongoing highly specialized, mission critical requirements related to water security.. Only the incumbent can reasonably be expected to continue to perform these services in the few remaining months before the follow-on contract is awarded, without incurring unacceptable delay, added cost, duplication of effort, and potentially jeopardizing success of the Agency requirements. Moreover, the costs and effort for both the Agency and potential contractors to process a separate procurement to maintain access to required services for the final four months of the current contract would be counter productive to channeling resources to the follow-on award. The Agency will be focused on evaluating and awarding a new contract, and contractors may be using their proposal development staff to prepare a complete responsive submission for the new award..
- b) The unique ability and critical need to support WSD and other Offices within the Agency for sensitive and/or secret services currently being provided under the WSD contract, is of a high priority aspect to the Agency, and will be seriously impacted by the current ceiling limitations (see #3).
3. **Description of the Supplies or Services:** The subject WSD contract provides technical support services of a unique nature for the WSD mission needs, and also provides critical support services to other Offices of the EPA. The contract provides support services directly involved with the mission of the WSD and/or our homeland security, and is also available to provide unanticipated services of a nature critical to the Agency related to the evolving mission of the WSD that may become necessary during the life of the contract. Services within the scope of work include critical infrastructure protection; national preparedness, response, and recovery; and Agency communication, information, and program management support efforts related to the contract PWS scope. The Performance Work Statement of the contract also specifically notes that other Agency Offices in need of these types of services may utilize the contract. Significant non OW users of the contract include OSWER's Office of Emergency Management (OEM) and ORD's National Homeland Security Research Center (NHSRC). Both of these Offices have consistently used the WSD contract in the past and will be severely impacted without

DELIBERATIVE – DO NOT CITE OR QUOTE

the ability to access necessary services available under the subject WSD contract. The WSD contract is unique in its capacity to provide classified/secret activities support and an accompanying broad spectrum of technical services. Without an increase in capacity for the final four months of this last option period of the contract, the opportunity for WSD and OSWER/OEM to fully utilize the contract for their highly sensitive, mission critical services in support of our national security will be critically impacted. The following chart demonstrates the additional amount of effort and cost required to fully support key high priority tasks during the final four months of the contract (April – July).

Work Assignment #	EPA Office	LOE To Be Added		
WA 4-2	OW/WSD	1970 LOE		
WA 4-4	OW/WSD	4630 LOE		
WA 4-5	OW/WSD	960 LOE		
WA 4-11	OW/WSD	1900 LOE		
WA 4-12	OSWER/OEM	4580 LOE		
WA 4-13	OW/WSD	1850 LOE		
WA 4-17	OW/WSD	4110 LOE		
TOTAL		20,000 LOE		

*Rate approved for work plan performance.

The capacity on this contract had been structured at time of award as a bell curve. This was thought appropriate, as the main requirement for contract coverage at the time was the Water Security Initiative (WSI). WSI was implemented as a pilot project on the Greater Cincinnati Water Works, and was conducted as contractor supported effort combined with a CRADA agreement, and was initiated to address the Agency’s charge under Homeland Security Presidential Directive #9 (HSPD-9). It was assumed that by the final period of the contract there would be less need for services, as the pilot was scheduled for a three year period, finishing before the last option period of the contract. The pilot has completed, but now there is significant effort still required related to WSI in the evaluation effort (of both the Cincinnati pilot and the four other expansion pilots in New York City, San Francisco, Dallas, and Philadelphia which are implemented through cooperative agreements), guidance development, and other types of technical support. In addition to this continued need for contract coverage of the WSI project, other very critical needs for the Water Security Division have emerged. Following the events of Hurricanes Katrina and Rita, and significant flood incidents, the WSD became involved in leading efforts toward reciprocal water sector efforts (specifically the WARN system discussed in paragraph (c) below) and training and exercises related to emergency planning and actions. This has become a large effort under the contract. Another unanticipated area of contractor support which has developed is the area of climate change readiness in the water sector. WSD is tasked with developing a Climate Change Tool that will help water utilities better be prepared for the types of flooding, rainfall shifts, droughts, etc. that are expected under a climate change scenario. These and other unanticipated elements of WSD mission, related to the shifting focus of threats to safe drinking water, especially in the all hazards arena, have kept the need for contractor support steady, instead of decreasing as had been anticipated at time of award. In addition, other Offices within the EPA, including OSWER/Office of Emergency Management and ORD/National Homeland Security Research Center have utilized significant services through the contract, related to contaminant laboratory method development, Top Secret records review, and the OSWER E-Lab project. These efforts will be jeopardized if additional funding is not available for their work also.

A brief summary of the services needed which will require an increase in capacity to fully address the requirements prior to the end of the current option period of the contract include:

- (a) *WA 4-2. Increase of 1970 direct labor hours* [REDACTED]. This work assignment concentrates on evaluation, technical support, and guidance development for enhanced security monitoring, consumer complaint surveillance, and consequence management activities in support of efforts at the initial WSI pilot in Cincinnati, OH and expansion pilots. Evaluation at the initial WSI Pilot includes drills and exercises that rely on Agency and contractor staff with specialized institutional knowledge of the design and deployment of this multi-year, multi-disciplinary project. This final set of drills and exercises at the initial pilot will be completed at the end of July. Equally critical is technical support and guidance to be conveyed to the expansion pilots during this period to support contamination warning system implementation efforts at these grant-funded utilities. This technical support and guidance is based on the specialized experience gained through lessons learned during the initial WSI pilot and is important in optimizing the expansion pilots’ ability to successfully meet grant timing expectations. Both the evaluation and technical support activities will reach their peak during the May – July period of the contract, when the drills and exercises will be completed and the lessons learned and guidance must be conveyed to the expansion pilots. Failure to provide effective guidance and technical support puts at risk the Agency’s investments through grants in these expansion pilots. The contractor supporting the evaluation and guidance development and technical support efforts was integrally involved in the design and deployment of the initial pilot in Cincinnati, OH, and has knowledge based on that support that is critical to the success and completion of these

activities. There is insufficient time to adequately transfer this knowledge to a new resource during the last few months of the contract, while still ensuring that ongoing evaluation, guidance, and technical support activities proceed uninterrupted and are completed in July. It would be unnecessary duplication of effort and extra cost to the Agency to bring a new contractor up to speed on this soon to be completed effort.

- (b) *WA 4-4. Increase of 4630 direct labor hours* [REDACTED]. The Water Security Initiative (WSI), tasked under HSPD #9, is being implemented to deploy and test drinking water contamination systems, first in Cincinnati, OH, then in four additional large metropolitan areas,. The pilot systems are designed to provide early detection on intentional or accidental contamination of drinking water supplies to provide time for response and mitigation of consequences of such an event. This work assignment concentrates on simulation and modeling of the entire WSI system and technical support and guidance for water quality monitoring, sampling and analysis, and public health surveillance activities at the initial WSI pilot and the expansion pilots. Coding for the simulation model for the contamination warning system, developed based on the initial pilot, will be completed at the end of the contract. This includes finalization of coding of component models (for all five contamination warning system components), database testing, and subsequent data analysis for model outputs. This is critical for evaluation of the Agency's initial pilot system in Cincinnati in reducing detection and response times for water contamination events and also for input to four EPA-sponsored expansion pilot systems deployed throughout the country, which had been awarded through a competitive cooperative agreement process. Both the simulation model coding and the technical support activities reach their peak during the May – July period of the contract, when coding of the model will be completed and when the grant funded expansion pilots are anticipating significant input from lessons learned and technical support. Effort is essential to meet schedule and objectives in fulfilling the Agency's charge under HSPD-9. Significant resources have been applied to the WSI project included as WA 4-2 and 4-4, and the final evaluation piece is imperative to fully realize the value back to the Agency on the effort through the evaluation of the pilot systems and development of guidance for the water sector. The contractor supporting the simulation model and the technical support efforts was integrally involved in the design and deployment of the initial pilot in Cincinnati, OH, and has knowledge based on this support that is critical to meeting Agency goals. There is insufficient time to adequately transfer this knowledge to a new resource during the last few months of the contract, while still ensuring that ongoing simulation and evaluation activities are uninterrupted. In addition, the information being reviewed concerning the water utility's specifics of distribution and security practices may require not only specialized expertise, but appropriate security clearance levels and the ability to store sensitive information in a facility with approved clearances. All coding of simulation study inputs will be completed by the end of the period, therefore there would be unnecessary duplication of effort and extra cost to the Agency to bring a new contractor up to speed on this soon to be completed effort. Failure to perform a timely and knowledgeable evaluation of the initial pilot for use in providing feedback to the expansion pilots puts at risk the Agency's considerable investment through grants to these expansion pilots.
- (c) *WA 4-5. Increase of 960 direct labor hours* [REDACTED]. This work assignment provides emergency response support, including Water and Wastewater Agency Response Network (WARN) program technical support services which offer support to the water sector for developing and implementing mutual aid and assistance agreements critical to ensuring an effective and efficient response to an emergency impacting drinking and wastewater systems (this need became obvious and critical following Hurricane Katrina). The program provides the training and tabletop exercises that prepare the water sector to coordinate with each other and with other response partners in emergency situations, reducing the potential consequences of such actions. The core of this effort – multiple, on-site, face to face tabletop exercises are scheduled for states during the May-July period. These exercises are scheduled for states needing to prepare for the upcoming hurricane season, as well as other potential natural and man-made hazards that the water sector faces. A total of eight on-site exercises are scheduled during the last months of the contract. Subject matter experts under the contract have worked with EPA and the table top exercise participants in planning these exercises and in identifying any state-specific needs that are to be tested and evaluated during these exercises. Transferring responsibility for successfully conducting these exercises to different resources presents a risk in meeting exercise objectives, which were negotiated and shaped during the planning process. As a result, the Agency's and the water sector's investment in planning and preparing for these exercises will be compromised. The planned exercises will be completed by the end of the contract period, so it would incur unnecessary duplication of effort to bring a new resource into the schedule at this point in the process.
- (d) *WA 4-11. Increase of 1900 direct labor hours* [REDACTED]. This work assignment provides Agency coordination with Department of Homeland Security (DHS), intelligence coordination (including classified water intel reports), and development of risk assessment tools and assessments (dealing with terrorism, natural disasters, and climate change). A contractor supporting this task must possess top secret clearance and facility clearance in executing the requirements this work assignment entails. The Agency continues to encourage the conduct of risk assessments and the creation/upgrade of emergency response plans at drinking water and wastewater (water sector) utilities. Risk assessment conducted by utility owners and operators create the foundation for the implementation of all risk mitigation budget resource allocation and activities. Therefore, it is essential for the Agency to finalize the upgrade of a drinking water and wastewater risk assessment methodology and emergency

response plan software package. The upgrades currently in process will incorporate consistent consequence and threat data in a user friendly tool; the upgrade currently is being performed and will be tested and finalized during the last 6 weeks of the contract. In addition, under this work assignment, the Agency is creating a climate change risk assessment and awareness software tool. By interpreting current climate science data, the user-friendly tool will aid utilities to better assess potential climate change impacts at water sector utilities. Several of the major tool development efforts will be entering major coding phases during the May – July period. Newly available natural hazards data sets, which drive algorithms in the tools, are larger and more complex than previously anticipated, which has increased the scope and extent of the resources needed to evaluate and incorporate the datasets into the tools throughout the coding process. Because testing and finalization of the tool will occur during the final two months of the contract, there is insufficient time to adequately transfer activities to a new resource during the final two months of the contract, while still ensuring that ongoing coding continues uninterrupted to meet the July 2010 completion date. Continuation of this initiative is critical to bring the Agency’s investment in tool design and coding and key stakeholder collaboration to fruition, and is in line with the Administrator’s priorities (memo dated 1/12/10).

- (e) *WA 4-12. Increase of 4580 direct labor hours* [REDACTED]. Office of Solid Water and Emergency Response/ Office of Emergency Management (OEM) support under the contract. OEM is responsible for establishing, operating and maintaining the Agency-wide Environmental Response Laboratory Network (ERLN), which is designed to be an all-hazard (chemical, biological, radiological, and nuclear), all environmental media network that builds on or leverages existing capabilities and capacities. This initiative addresses responsibilities assigned to EPA under Homeland Security Presidential Directives (HSPDs) 9, 10, and 22. OEM is currently increasing the size of the ERLN by adding more than 100 laboratories during the next 4 months, and is currently in a solicitation process with OAM to procure public and private laboratories for ERLN operations. This procurement initiative will continue at least until the end of June 2010. The evaluation of 3rd Quarter FY10 ERLN submissions is scheduled for completion in July 2010 and requires ongoing, contractor support during the May – July period. The contractor is also currently involved in the generation of a laboratory through-put design product which will allow OEM to determine analytical capacity of current ERLN laboratories. Once the design is approved by EPA, an analytical through-put exercise will be conducted to test actual capacity with the laboratories. The contractor not only is involved in the design generation, but will be collecting and tabulating data from the through-put exercise. The laboratory portion of the exercise is expected to begin in April and will be completed by the end of June. Tabulation of data will be performed at the end of the study. This exercise is a product that EPA has promised to the Department of Homeland Security as part of a technology transfer process between DHS and EPA. Support to both of these activities requires current knowledge of all ERLN program requirements, as well as subject matter expertise in laboratory capabilities. The ability to work with some of the laboratory capability data also may require not only specialized expertise, but appropriate security clearance levels and the ability to store sensitive information in a facility with approved clearances. Transferring responsibility for successfully addressing the high volume of laboratory submissions in the short time period before the end of the contract presents a risk in meeting OEM deadlines for laboratory approval and for securing access to these laboratory capabilities. Without having sufficient capacity available for OEM on the contract, high priority requirements will be severely impacted, jeopardizing the progress toward carrying out homeland security directives.
- (f) *WA 4-13. Increase of 1850 direct labor hours* [REDACTED]. This work assignment encompasses the Water Contaminant Information Tool (WCIT) a database of contaminant information for the water sector, including searchable data base, detection method information, possible health effects, how to identify the contaminant, and practical decontamination techniques. This on-line tool is vital to the preparedness, response, and recovery of the water sector to an intentional or unintentional incident. The work assignment ensures that the WCIT tool is kept operational, maintained for technical or informational purposes, and new users who need the important information are certified to become an eligible user. Additional contaminant information research and population is planned for completion by the end of the current contract. The contaminant information requires subject matter expertise in a combination of contaminant fate and transport properties, detection techniques, exposure routes, toxicity, health effects and medical treatment for the entire range of contaminant classes, including biological and chemical warfare agents. The ability to work with some of the contaminant data also may require not only specialized expertise, but appropriate security clearance levels and the ability to store sensitive information in a facility with approved clearances. In collaboration with the U.S. Geological Survey (USGS) EPA has also scheduled an integration of the WCIT and the National Environmental Methods Index – Chemical, Biological, Radiological (NEMI_CBR) applications to more effectively use federal funds supporting these similar projects. The integration is planned for completion in July 2010. This activity requires a combination of both programming capabilities and subject-matter expertise in contaminants and environmental method technical data. There is insufficient time to adequately transfer activities to a new resource during the last few months of the contract, while still ensuring that these activities continue uninterrupted to meet the July 2010 completion date. The Agency’s investment in these activities is designed to support response efforts, and to reduce the Agency’s information management burden by providing a consolidated source of contaminant information to the water sector and first responders. Related information currently is managed and accessed separately, potentially

impacting response efforts. The Agency's investment in planning for this consolidation (which involved not only coordinating with USGS, but also across multiple EPA offices) is designed to support response efforts and to reduce Agency information management burden, and cost will be impacted if progress cannot proceed as planned.

- (g) *WA 4-17. Increase of 4,110 direct labor hours* [REDACTED]. This work assignment supports the Water Laboratory Alliance (WLA) which was developed in response to HSPD-9 and provides the water sector with an integrated network of laboratories. This network provides the capabilities and capacity to analyze water samples in the event of incidents involving chemical, biological, and radiological contaminants. The WLA program has been established in coordination with the Agency-wide ERLN (see WA 4-12) and milestones in the areas of method development, communication and outreach, and joint response planning across Regions are critical priorities in the May – July period. A recent, dramatic increase in WLA infrastructure development and communication and outreach includes a Water Laboratory Alliance Summit in June, which the Agency already has committed to, and has spent substantial effort preparing for. Additionally, multiple laboratory method development projects are scheduled for completion in July. In addition to the specialized expertise required to conduct and complete these studies on priority contaminant laboratory methods, the contractor also may require access to sensitive contaminant and technique information from EPA and other agencies, and so appropriate security clearance levels and the ability to store sensitive information in a facility with approved clearances is needed. The Agency has significantly invested in the WLA to complete these activities in the June – July period, and additional contract ceiling is needed to implement and conduct the scheduled programs and studies to enhance emergency preparedness in the water sector. Because the final stages of the studies and programs in the last three months of the contract heavily leveraged specialized expertise and a substantial amount of planning by the current contractor, there is insufficient time to adequately transfer this knowledge to a new resource during the last few months of the contract, while still ensuring that the laboratory network program tasks are completed and, equally critical, the high-priority method development studies are completed in July. Failure to complete both the programmatic milestones and scientific projects puts at risk the significant prior investment by the Agency for these projects.

4. Authority:

<u>Exception</u>	<u>Authority</u>	<u>FAR Cite</u>
Only one responsible Source	41 U.S.C. 253(c)	6.302-1

5. Describe how the contractor's unique qualifications or the nature of the acquisition requires use of the authority cited:

The nature of the acquisition requires EPA to use the authority cited because of the nature, time frame, and uniqueness of the services required. The services under the current contract are highly specialized, complex and of a critical nature for security of the nation's water supply. In addition, the subject contract includes specific capabilities for secret and/or sensitive work, which are not common on other Agency contracts already in place. Several of the requirements are dictated by Homeland Security Presidential Directives (HSPD-7 and HSPD-9) and are outgrowths of the Bioterrorism Act, an Amendment to the Safe Drinking Water Act. Some of these requirements are in sensitive stages of development, and abandoning the efforts at this point for lack of capacity would not be a reasonable option; likewise, the time required to solicit a new contractor and allow that contractor to get up to speed on the requirements in the few remaining months of the last option period of the current contract would not be cost effective or efficient. Several of these projects are in a critical stage, with final deliverables, project evaluations and reports, and implementation of developmental tools at risk. Obtaining mission critical services elsewhere through a new procurement would result in incurring duplicate costs and unacceptable delay in fulfilling these high priority security-related requirements, when there is already an ongoing solicitation for these services being conducted through the contracting office

- 6. Describe the efforts made to ensure that offers are solicited from as many potential sources as practicable:** The Water Security Division, assisted by CPOD, solicited the current contract as a full and open competition. There was significant competition at that time, with six offerors. The incumbent contractor was the clear awardee, scoring as the most highly technical offeror, with the second lowest cost of all offerors. CPOD has already issued the solicitation for the follow-on contract, which is scheduled for award by July 31, 2010. There is no way that another means of acquiring the required services, in the capacity level required, could be made available to the Agency in any manner more efficient than utilizing the sole source increase to the current contract. Other sources are anticipated to be forming teams and preparing their proposals for the follow-on award, since the RFP has already been posted on the CPOD OAM website (February 22, 2010), with proposals due on April 12, 2010. Preparing a separate proposal for four months of increased capacity in the current contract would not be a cost or time effective action on the part of the contracting community, and would be inefficient and costly to the Agency to solicit, evaluate and award. CPOD issued a synopsis on FedBIZOPS on February 12, 2010, stating the intent to issue a sole source modification to increase the ceiling capacity of Contract EP-C-05-045 during Option Period

IV in an amount of 20,000 LOE with CSC. Though not a formal request for proposals, interested parties were afforded an opportunity to respond within fifteen (15) days of issuance of the synopsis.

7. Determination of Fair and Reasonable Cost to the Government. Cincinnati Procurement Operations Division and the Program Office will review the submission that the current contractor would submit as a response to the request for 20,000 direct labor hours on Option Period 4. These costs would be compared to the fully reviewed Option Period 4 proposal submitted at the time of contract award, including any changes in indirect rate agreements. The Program does not anticipate requesting any revision to the labor category allocation which was solicited at time of original award, as the contractor is fully satisfying all of the work assignment requirements while performing within the proposed cost of the contract, therefore the Program believes an appropriate mix of staff was solicited on the original RFP.

8. Description of the market research conducted (see FAR Part 10). If no market research was conducted, state the reasons:

EPA did not conduct market research for this capacity increase because the Agency realizes there are multiple firms in the contractor community which may be capable of providing these services as a general matter. The significant competition on the prior award for these services demonstrated that. However, given that the services required under the JOFOC are only for a four month period until the follow-on is awarded, only the incumbent can reasonably be expected to continue to perform these highly specialize, mission critical services without undue delay, added cost, duplication of effort, and potentially jeopardizing the success and completion of deliverables within the performance period.

9. Other facts supporting the use of other than full and open competition:

A. The level of capacity if this request for increase is approved is consistent with actual usage on the contract during the previous periods:

* Entries represent capacity if increase is approved.

- B. The continuation of the support provided by the efforts under this contract are consistent with the priorities outlined in the message from Administrator Jackson, dated 1/12/10, specifically priority (1): Taking Action on Climate Change; and Priority (5): Protecting America’s Waters.
- C. Significant investment has already been made by the Agency during the first 4 ½ years of this contract on high priority works, achieving significant success on many of the projects. To allow these projects to stop during the final 4 months of the contract would impact negatively the strides being made, and the final outcomes of the projects.

10. List sources that expressed, in writing, an interest in the acquisition. If no sources expressed an interest in writing, indicate such.

Alternate sources have been focused on interest in the new requirement, to be awarded within the next 5 months, which will support these services for a subsequent five years. No sources have expressed an interest in performing a piece of the current contract, but several are requesting information and status of the follow-on award.

11. Include a statement of the actions, if any, the Agency may take to remove or overcome any barriers to competition before any subsequent acquisition for the supplies or services required.

The Agency is fully anticipating a significant competitive situation for the subsequent acquisition of these services, which has already been initiated. The RFP was issued on Feb. 22, 2010. The follow-on is being solicited as a full and open competition.

DELIBERATIVE – DO NOT CITE OR QUOTE

**SIGNATURE PAGE
JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION
Contract EP-C-05-045**

Technical Officer's Certification

I certify that the facts and representations stated in this justification are complete and accurate which form the basis to award this requirement.

Signed

Nancy Muzzy

Signature of Technical Officer

(513) 569-7864 Muzzy.Nancy@epa.gov

Contracting Officer's Certification

I certify that this justification is accurate and complete to the best of my knowledge and belief.

Signed

Cathy Basu

Signature of Contracting Officer

(513) 487-2042 Basu.Cathy@epa.gov

Service Center Manager Review

My review concurs with the accuracy and completeness of this justification.

Signed

Lisa Stultz

Signature of Service Center Manager

(513)-487-2041 Stultz.Lisa@epa.gov

Competition Advocate Approval

Signed

Susan Moroni

Competition Advocate

(202)564-4321 Moroni.Susan@epa.gov