

**Region 4
U.S. Environmental Protection Agency
Laboratory Services & Applied Science Division
Athens, Georgia**

Operating Procedure

Title: Purchasing Services and Supplies

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Issuing Authority: Deputy Director, LSASD

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Purpose

This Operating Procedure is specific to the Region 4 Laboratory Services & Applied Science Division (LSASD) to maintain conformance to technical and quality system requirements. This procedure defines the process for purchasing of services, supplies and equipment whose properties could affect the quality of sampling, measuring and testing activities. This procedure also describes the process under which these services and supplies are evaluated for suitability.

Scope/Application

The requirements of this procedure apply to all personnel who perform work under the LSASD Quality Management System (QMS). Purchasing of services can include, but are not limited to, equipment maintenance, repair, and certification. Purchasing of supplies can include, but are not limited to, chemical standards and reagents, sample containers, disposable sampling equipment, tubing and laboratory consumables. Purchasing of equipment can include, but are not limited to, laboratory instrumentation, field equipment, and equipment for maintain operations at the LSASD and FEC facilities. Whenever possible, services will be purchased from vendors that are accredited (i.e., ISO 17025). While this SOP may be informative, it is not intended for and may not be directly applicable to operations in other organizations. Mention of trade names or commercial products in this operating procedure does not constitute endorsement or recommendation for use.

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Administrative Procedure

1. Purchasing

- 1.1. A variety of factors can affect the contracting/procurement process for supplies and services, and the contract clauses that are used in Federal acquisition, most of which is cost and quality for LSASD. A number of cost thresholds exist that trigger increasing degrees of complexity in the acquisition process. These thresholds include the micro-purchase threshold, the simplified acquisition threshold, and the commercial items threshold. Since LSASD uses the micro-purchase and the simplified acquisition purchases, they will be covered in this SOP.
- 1.2. The micro-purchase threshold is generally \$10,000, with some exception. No competition or publication requirements are mandated for micro-purchases; generally, the Government Commercial Purchase Card (GCPC) can be used for these purchases under Federal Acquisition Regulation (FAR) Part 13.
- 1.3. From \$10,000 to \$100,000, EPA may make use of simplified acquisition procedures under FAR Part 13. The simplified acquisition threshold can be increased in situations specified in FAR Part 13 up to \$5,000,000 under a test program in which Congress continues to reauthorize for acquisition of commercial items under FAR Subpart 13.5, Test Program for Certain Commercial Items. Items must qualify as a commercial item under the definition of FAR Part 2 and be supported by market research as specified in FAR Part 10.

2. Micro Purchases

- 2.1. These types of purchase transactions are performed by using the GCPC. The holders, or purchasing officials, of the GCPCs are limited in number and require special training. Purchases made on the GCPC can be for services and/or supplies and equipment (including chemicals), however, these purchases are limited to a maximum of \$10,000 per transaction. A purchase of up to \$10,000 can be made on the GCPC for emergency situations as approved by management.
- 2.2. Purchases of supplies and/or services can be initiated by any EPA employee. For completing the mission of the agency, EPA uses contractors to perform work. EPA employees must initiate purchase requests on behalf of contractors when supplies or services are needed.

2.3. LSASD makes purchases for supplies and services through the use of procurement request forms. The following provides the procedure for making purchases for supplies and services in LSASD:

- Verify that the purchase meets the threshold requirements for a GCPC purchase;
- Ensure sufficient funding is available for the purchase;
- Determine the specifications for the supply and/or service;
- Establish acceptance criteria for use in evaluating the supply or service;
- Get a quote for the supply or service (quotes for services must also include travel and per diem as necessary);
- Attach a signed National Defense Authorization Act (NDAA) certificate form (in response to 52.204-24); and,
- Complete the purchase request form located on the LAN and route for signature.

2.4. Upon completion of the purchasing documents by the originator, management will authorize the purchase by signing all applicable forms. The purchasing documents will then be routed through the approving official to ensure the vendor is an approved supplier and that the paperwork has been completed properly. If the supply or service is being provided by a new vendor, the approving official will obtain ISO accreditation information from the new vendor, if the information exists, the vendor will be added to the list of approved suppliers. The approving official will then forward the documents to the purchasing official for ordering. If the vendor is already on the approved vendor list, the order will be placed. If the supplier is not on the approved vendor list and there is no ISO accreditation information available, the vendor's name will be placed on the approved vendor list with a notation that the supplies and/or services will be required to be evaluated before the vendor can be placed on the vendor approved list permanently. The evaluation should be based on, but not limited to quality, timeliness of delivery, meeting QA/QC method requirements, contaminant free, and durable.

2.5. The originator of the service request will evaluate the provided service for suitability upon completion of the service. If deemed acceptable by the originator, based on the specification of the service request, an approval comment will be added to the approved supplier list, If the service is deemed unacceptable, the purchase originator will work in conjunction with the vendor and the purchasing official to correct the problems associated with the provided service.

Note: When purchasing compressed gasses or bulk liquid nitrogen, there is a separate form located on the LAN that includes pre-negotiated prices. This form gets filled out, signed by the analyst, signed by the Section Chief and submitted to the purchasing official.

Note: The same procedure described above is used for supplies and/or services being ordered for both the 980 College Station Rd facility and the FEC. The shipping address is specified on the purchase request form.

3. Ordering Chemicals

- 3.1. When placing an order for solvents, reagents, and standards the same procedure is used as described above, however, the purchase request form must also be signed by the chemical hygiene officer for maintaining chemical inventory within the EPA facility and FEC.
- 3.2. For detailed procedures on chemical purchasing, receipt, storage, and disposal, refer to LSASD SOP for Maintaining Chemical Inventory.
- 3.3. For chemicals and standards that are stored at the FEC and used to calibrate field meters, the purchase request should be prepared by an equipment manager. These chemical standards will then be directly shipped to the FEC where they will be stored for use. Chemical standards and preservatives stored at the FEC are tracked using the Field Equipment Tracking System (FETS).
- 3.4. The Office of Quality Assurance requests standards from Headquarters for CLP labs. Chemicals will be received by OQA staff and stored in the designated area. Due to the small quantity and type of standards received, the chemicals are tracked separately by OQA staff and not entered into the laboratory chemical tracking software.

3.4.1. Identifying and Labeling Chemicals

- 3.4.1.1. The CHO and originator will ensure that chemical standards, reagents, and reference materials are uniquely identified and correctly labeled. Labels on all chemicals will include the name, concentration, manufacturer or vendor, lot number, date received, date opened and expiration date. Specific hazard information for each chemical is addressed in its Safety Data Sheet (SDS), which should be kept in the area in which the chemical is used.
- 3.4.1.2. Labels on stock and intermediate chemicals will show the chemical name, and either reflect or be traceable to its concentration by a unique ID, date opened/prepared or expiration date and preparers initials. Additional chemical hazard information is specifically addressed in the SDS.

4. Verification of Supplies and Chemicals

- 4.1. LSASD will ensure that supplies are not used until they have been inspected or otherwise verified as complying with LSASD Quality Management System requirements. If supplies need to be released for use prior to being verified, the project leader/analyst will notify the appropriate System Manager and equipment manager (if

applicable). The project leader/analyst will fill out LSASD FORM-1017 (Quarantined Item Release Form) prior to taking supply items out of quarantine.

- 4.2. Verification of field supplies such as sample containers, disposable sampling equipment (e.g., COLIWASAs, bailers), latex gloves and tubing is conducted as described in the LSASD Procedure for Field Sampling Quality Control (LSASD PROC-011). The Field Services Branch Quality Assurance Officer is responsible for maintaining records of the results of the verification of sample containers, latex gloves, and tubing.
- 4.3. All buffers/standards and reagents will be tested prior to use and the test results will be compared to those of similar materials from independent sources or lots for verification. Commercially available chemical preservatives will be tested as described in the Field Sampling Quality Control Operating Procedure (LSASD PROC-011). A record of the tests and the results will be maintained at either the FEC or the LSASD laboratory, depending on the storage location.
- 4.4. Verification of laboratory supplies will be conducted following ASB Operating Procedure 121G.
- 4.5. Suitability of routine supplies/reagents is documented through the analysis of laboratory method blanks performed unless method requirements indicate additional certification is required. Method blanks are performed prior to using supplies for routine sample analysis. A clean method blank documents that all reagents and supplies used in the associated batch were suitable for use. The acceptability is documented on the certificate of analysis or logbook. A contaminated method blank requires corrective action to determine whether the contamination is the result of unsuitable reagents, or contamination introduced in the sample handling process.

5. Simplified Acquisitions

- 5.1. The simplified acquisition purchases are used for procuring capital equipment items or large service agreements totaling more than \$10,000 but less than \$5,000,000. These types of purchase transactions are performed by the R4's contracting group, specifically a contracting officer (KO). Purchases made by simplified acquisition can be for services and/or equipment, however, they require a detailed scope of work for the service or a detailed description of the equipment to be purchased. In addition, these purchases require market research for determining fair market value for the product and an advertisement period. If the capital equipment purchase or service will be provided by a specific vendor, a sole source justification must be provided with the contracting submittal.

5.2. The following provides an outline for making a simplified acquisition purchases for equipment and services in LSASD:

- Verify that the purchase meets the threshold requirements for a simplified acquisition;
- Ensure sufficient funding is available and has management approval;
- Draft a detailed scope of work for the equipment or service;
- Perform market research and get a minimum of 3 detailed quotes meeting the requirements outlined in the detailed scope of work;
- Establish acceptance criteria for use in evaluating the final bids; and,
- If a purchase will be made by a specific vendor/manufacturer, prepare a detailed sole source justification.

5.3. Once the paperwork is completed and has all of the approval signatures from management, the originator will work with a contracting officer's representative (COR) and/or KO for reviewing the documentation, advertising for the purchase, evaluating the respondents bids and specifications, and making an award for the procurement. Advertising for a federal purchase is done on the beta.sam.gov web site.

Note: The simplified acquisition process is complex as detailed in the FAR, therefore, can take several months to complete. The COR and KO will help guide the originator through the process.

6. Delivery

6.1. EPA staff will accept delivery of supply orders. For purchases received at the LSASD laboratory, the equipment/system manager or originator of the order will inspect the items to ensure they comply with the purchase request or bankcard order. If the items are acceptable, the equipment/system manager or originator will sign and date the invoice that accompanied the order. For purchases received at the FEC, contract personnel may inspect the items to ensure they comply with the purchase order request. If the items are acceptable, the contract personnel will sign and date the invoice that accompanied the order. The signed invoice will be supplied to the purchasing official. If any supplies prove to be unsuitable for use, the equipment/system manager will document the issue. The equipment/system manger will compile all occurrences of unsuitable consumables, supplies or services and determine what further action may be necessary.

7. Records Management

7.1. Purchase request documents for services and supplies is maintained by the purchasing official. A list of certified suppliers for services and supplies is maintained by the branch equipment manager or appropriate systems manager. Certificates of Analysis for purchased standards will be maintained by the purchase originator in the location where the standards are stored.

8. Definitions

- 8.1. Branch Equipment Manager- Staff designated by management to be responsible for ensuring that the procedures for Equipment Inventory and Supply Management are followed. At least one Equipment Manager will be designated for the Enforcement Section and the Ecology Section in FSB. One Equipment Manager will be designated for the entire Analytical Services Branch.
- 8.2. Branch Quality Assurance Officer- Branch Quality Assurance Officers (QAOs) are designated by and report to the Section Chiefs in both field branches. The Branch QAOs assist the Field Quality Manager (FQM) in disseminating, reviewing and implementing the LSASD field branches quality management system.
- 8.3. Buffer/Standard- A reference material whose properties have been established so that it can provide a level of performance verification.
- 8.4. Certificate of Analysis- A document issued by the manufacturer of a chemical reagent, standard or reference material that certifies its identity, concentration, or purity.
- 8.5. Chemical Hygiene Officer (CHO)- An individual assigned by LSASD management to monitor procurement and use of chemicals within LSASD through a Chemical Inventory Program; also advises on the special handling and disposal requirements for chemicals.
- 8.6. Federal Acquisition Regulations (FAR) - The Federal Acquisition Regulations System is established for the codification and publication of uniform policies and procedures for acquisition by all executive agencies. The Federal Acquisition Regulations System consists of the FAR, which is the primary document, and agency acquisition regulations that implement or supplement the FAR.
- 8.7. Reference Material- A material with known analyte concentration and matrix type used to demonstrate that a measurement system is functioning.
- 8.8. Reagent/Chemical- Any water, solvent, gas or chemical that potentially affects the outcome of environmental measurements.
- 8.9. Supplies- Any materials such as calibration standards, sample containers or disposable sampling equipment that potentially affects the outcome of environmental measurements.
- 8.10. Verification- Visual inspection and/or testing of supplies to verify consistency with labeling and/or certification.

9. References

Region 4 LSASD Analytical Services Branch Laboratory Operation and Quality Assurance Manual, Most Recent version.

LSASD Safety, Health and Environmental Management Program (SHEMP) Manual, Most Recent Version

LSASD Operating Procedure for Equipment Inventory and Management, LSASD PROC-108, Most Recent Version

LSASD Operating Procedure for Field Sampling Quality Control, LSASD PROC-011, Most Recent Version

LSASD Operating Procedures for Maintaining Chemical Inventory, Most Recent Version

Analytical Services Branch Operating Procedure for Screening of Supplies, Most Recent Version

Quarantined Item Release Form, LSASD FORM-015, Most Recent Version

LSASD Bankcard Order Form

Federal Acquisition Regulation

Revision History

This table shows changes to this controlled document over time. The most recent version is presented in the top row of the table. Previous versions of the document are maintained by the LSASD Document Control Coordinator.

History	Effective Date
LSASD PROC-1008-R0, Purchasing of Services and Supplies, Original Issue	October 1, 2017
Changed the revision number to R1. The SOP has been modified to describe the procedures for ordering supplies and services within LSASD in accordance with the FAR.	April 23, 2021