



888 17th St. N.W., Ste. 1100
Washington, D.C. 20006
Ph: 202-775-8400
www.sebac.org

November 6, 2019

VIA E-Mail and USPS

Stephanie Shutt
Director, MAS PMO
Office of the Commissioner
Federal Acquisition Service
1800 F St. NW
Washington, DC 20405-001
stephanie.shutt@gsa.gov

Re: GSA MAS Consolidation SIN 562910REM

Dear Ms. Shutt:

I am writing to you on behalf of the members of the Small Environmental Business Action Coalition, Inc. (SEBAC), www.sebac.org. SEBAC serves as a voice for the small businesses community providing environmental engineering, remediation and related support to the U.S. Department of Defense (DOD) and other Federal agencies throughout the country. A key part of our mission is to support and protect small businesses by monitoring the federal government's goals, policies, and regulations regarding small business participation. In that regard, we request you change the small business size standard basis of \$20 million annual revenue for SIN 562910REM to the 750 employee-based size standard for environmental services, consistent with SBA's definition.

The SBA size standard for NAICS code 562910 has two separated definitions based on the type of services based as documented in *The August 2019 U.S. Small Business Administration, Table of Small Business Size Standards Matched to North American Industry Classification System Codes*. For environmental services that fall under NAICS code 562910 the size standard is 750 employees (see note below). For remediation (non-environmental services) the size standard is the \$22M, the same size standard that you have currently identified for SIN 562910REM Environmental Remediation Services (Category Attachment, Page 5).

“For purposes of classifying a Government procurement as Environmental Remediation Services, the general purpose of the procurement must be to restore or directly support the restoration of a contaminated environment. This includes activities such as preliminary assessment, site inspection, testing, remedial investigation, feasibility studies, regulatory

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compliance, remedial design, remediation services, containment, nuclear remediation, and removal of contaminated materials or security and site closeouts. The general purpose of the procurement need not necessarily include remedial actions. Also, the procurement must be composed of activities in three or more separate industries with separate NAICS codes or, in some instances (e.g., engineering), smaller sub-components of NAICS codes with separate and distinct size standards. These activities may include, but are not limited to, separate activities in industries such as: Heavy Construction; Special Trade Contractors; Engineering Services; Architectural Services; Management Consulting Services; Hazardous and Other Waste Collection; Remediation Services; Testing Laboratories; and Research and Development in the Physical, Engineering, and Life Sciences. If any activity in the procurement can be identified with a separate NAICS code, or component of a code with a separate distinct size standard, and that industry accounts for 50 percent or more of the value of the entire procurement, then the proper size standard is the one for that particular industry, and not the Environmental Remediation Service size standard.”

In addition, Question 10 from *The MAS Consolidation Frequently Asked Questions for Industry* ask: **“How will GSA determine the company size (small, large, etc.) for industry partners under the consolidated Schedule?”** The response states: “GSA will continue using the preponderance of work NAICS to determine business size at the Schedule contract level. NAICS level business size standards are defined by the [Small Business Administration \(SBA\)](#).”

The services (listed in the first paragraph, 1st sentence under the SIN 562910REM) either restore or support the restoration of a contaminated environment. We request you change the small business size standard basis of \$20 million annual revenue for SIN 562910REM to the 750 employee-based size standard for environmental services, consistent with SBA’s definition.

With warm regards,

A handwritten signature in black ink, appearing to read 'J Dwyer', written in a cursive style.

John Dwyer
SEBAC President
sebac@sebac.org