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July 9, 2021

Ms. Nastashia Willoughby
USACE Baltimore District
2 Hopkins Plaza
Baltimore, MD 21201
Nastashia.d.willoughby@usace.army.mil

RE: Solicitation W912DR21Q0069 - Fuel Removal, Cleaning, and Removal of Two Aboveground Storage Tank(s), Joint Base Fort Myer Henderson Hall, Virginia

Dear Ms. Willoughby,

Thank you in advance for review of this letter. 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 business 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 promote opportunities for small businesses by monitoring the federal government's goals, policies, and regulations regarding small business participation.

SEBAC respectfully asks that the USACE Baltimore District revise the NAICS code specified for the subject Solicitation. SEBAC's position is that this procurement should be classified under NAICS 562910, "Environmental Remediation Services" with a size standard of 750 employees based on meeting the three basic requirements in Note 14 of the U.S. Small Business Administration (SBA) Size Standards Table:

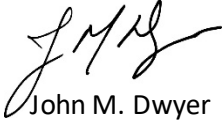
1. The general purpose of the procurement is to restore contaminated environments.
2. The procurement meets the requirement to have activities in three or more separate industries with separate NAICS codes. Per your announcement, these activities include engineering, investigations, and design (541620 Environmental Consulting); excavation of contaminated soil and material (562910 Remediation Services); relocation of utilities (237110/237130 water, sewer, power, and communication line construction); laboratory analysis (541380 Testing Laboratories); transportation of soil to a disposal facility (484220 Specialized Freight Trucking); and disposal of excavated soil (562211/562219 Hazardous/Nonhazardous Waste Treatment and Disposal).
3. Given the scope of the project, it is likely that no one NAICS code or industry will account for 50 percent or more of the value of the entire procurement.

We believe this is not only the correct size standard for this solicitation for the reasons stated above, but by assigning this size standard, the government will also receive more competition.

Please contact the undersigned at 404-636-0928 or by email at jdwyer@kemron.com with any questions or requests for additional information.

We look forward to engaging you in a dialogue.

Respectfully,

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

John M. Dwyer
President
SEBAC