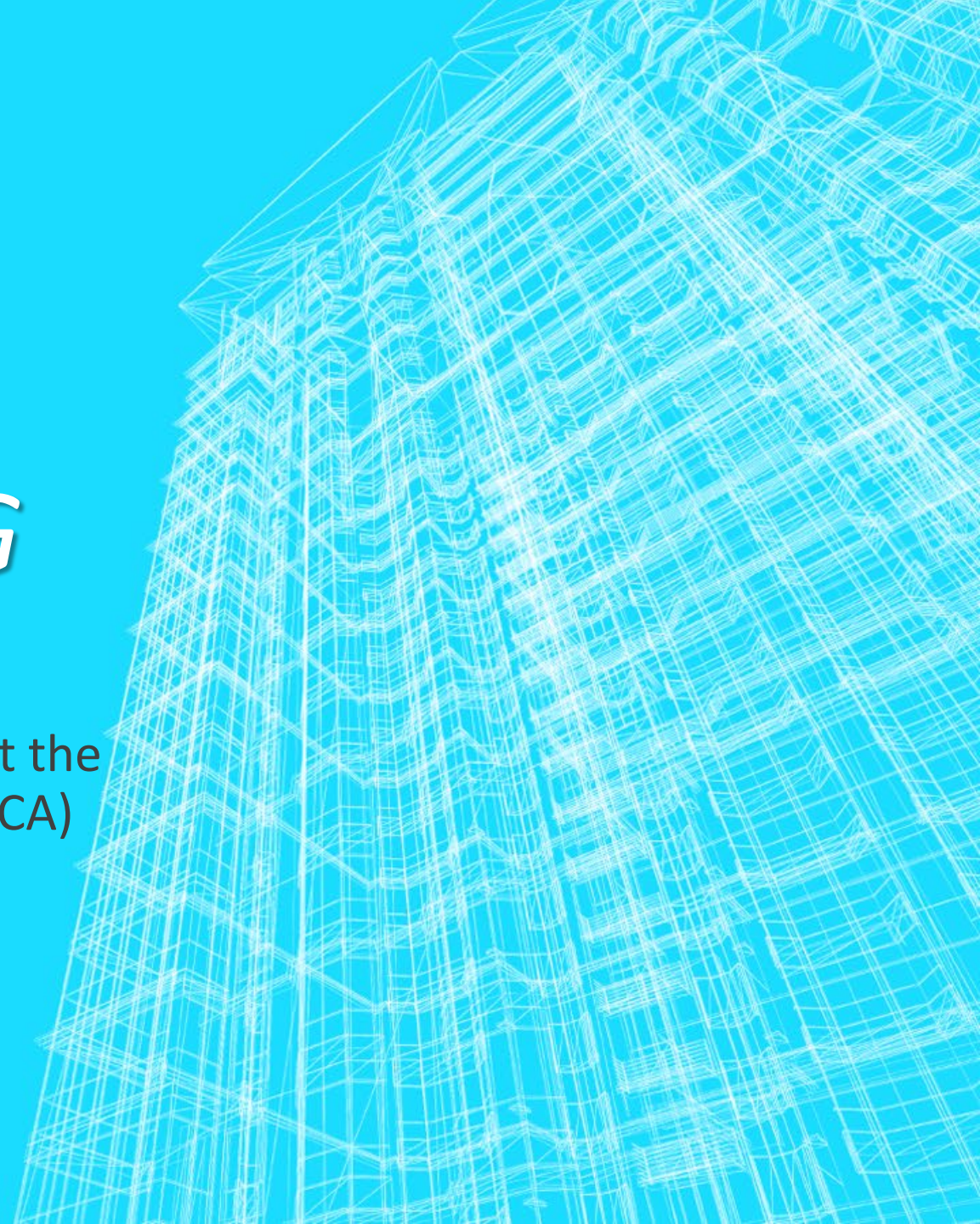


UC ENVIRONMENTAL PRODUCT DECLARATION (EPD) SUBMITTAL TRAINING

An update on submitting compliant EPDs to meet the requirements of the Buy Clean California Act (BCCA)

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Design & Construction, UCOP
May 12, 2023





AGENDA

1. Quick overview of BCCA
2. Breakdown the critical elements of an EPD
3. EPD Submittal Process
4. Exemptions
5. How to and who must review an EPD
6. Possible Issues



QUICK OVERVIEW OF BCCA REQUIREMENTS

- BCCA **requires** the submittal of Environmental Product Declarations (EPDs) on “**eligible materials.**”
- EPDs for eligible materials, for projects with a contract dated July 1, 2022 or later, must show that the **global warming potential (GWP)** for the eligible material is below the limit.
- **Limits** are found on the DGS Buy Clean website:
- <https://www.dgs.ca.gov/PD/Resources/Page-Content/Procurement-Division-Resources-List-Folder/Buy-Clean-California-Act>



WHAT MATERIALS ARE CURRENTLY* COVERED?

“Eligible materials” means any of the following:

(1) Carbon steel rebar - Concrete Reinforcing Steel

(2) Flat glass

(3) Mineral wool board insulation - High Density and Low Density

(4) Structural steel - Plate Steel, Hollow Structural Steel, Hot Rolled Steel Sections

*** PCC 3500 allows DGS to add more**



WHAT UC PROJECTS WILL THIS APPLY TO?

- PCC 3501:
 - (d) **“Eligible project” means a project that the awarding authority determines will require eligible materials.**
- For UC, an eligible project applies to construction contracts at or over \$1,000,000
- Also, the value of eligible material used on the UC project is \$25,000 or more. (use exemption)



BASIC DEFINITIONS

- **Product Category Rule (PCR)** - A PCR is a set of rules, requirements and guidelines used to develop an EPD for a product group.
- **Environmental Product Declaration (EPD)** - An EPD is an independently verified and registered document that reports a product's environmental impact over its life cycle.
- **Global Warming Potential (GWP)** -The various Greenhouse gases (GHGs) produced when manufacturing a product represented by an equivalent amount of carbon dioxide associated with the warming effect of a given quantity of a GHG. This is expressed as CO₂ eq.



EPD SUBMITTAL PROCESS

- Get access to the UCOP Box folder (***UCOP Buy Clean EPD Submittals***) by emailing anthony.cimo@ucop.edu
- Make sure you have a copy of the EPD to upload to the UCOP box
- Go to the OPEN ME FIRST folder and read the instructions.
- Instructions will tell you how to submit the EPD on a per project basis.
- You will create a separate folder and collection summary sheet for each project.
- You will upload the project EPDs and Exemption forms to that folder
- You will fill out the collection summary form for each EPD you upload



EPD SUBMITTAL PROCESS

(CONTINUED)

- Once you have complete prior steps, email anthony.cimo@ucop.edu and let me/him know that you have just uploaded EPDs.
- The EPD and collection summary form will be reviewed.
- If there is any supplemental information or corrections required, we will get back to you within 3-5 days.
- If not, we will submit immediately to DGS.
- If accepted or there is no follow up by DGS, we will let you know.
- IF DGS has any questions or concerns, we will follow up.



EPD SUBMITTALS – WHAT INFORMATION IS REQUIRED

Required information for EPD Submittal(Campus information):

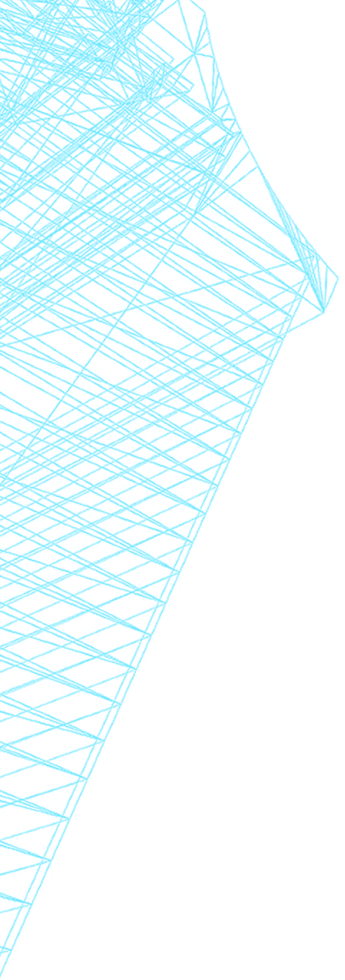
- Upload Date
- Project Number
- Project Name
- Project description
- Project award date
- Est. project completion date



EPD SUBMITTALS – WHAT INFORMATION IS REQUIRED?

Required information EPD Submittal (Information listed on EPD, including Product Category Rule - PCR):

- Eligible material
- Program operator (Organization that creates PCR)
- Declaration number (relates to PCR)
- EPD Issue date
- EPD Expiration Date
- Global Warming Potential from EPD
- Make sure EPD is facility-specific (Location of manufacture is required on EPD)



ENVIRONMENTAL PRODUCT DECLARATION

Concrete Reinforcing Steel

1. Eligible Material



According to ISO 21930 and ISO 14025

2. Program Operator



ISSUED FEBRUARY 25, 2021
VALID UNTIL FEBRUARY 25, 2026
DECLARATION NUMBER EPD 191
PREPARED FOR COMMERCIAL METALS COMPANY

- 3. Declaration Number
- 4. EPD Issue Date
- 5. EPD Validity end date
- 6. Product manufacturer



EPD SUBMITTALS – WHAT **ADDITIONAL** INFORMATION IS REQUIRED?

Required information for EPD Submittal but not on the EPD (furnished by contractor; reviewed by contractor and design professional)

- Contractor description of product used
- Quantity of Material and Unit of Measure (Metric Ton, Kilogram, Pound or Ton; Cubic Feet or Meters for Mineral Wool)

Specification Updates

- Requirements for EPD submittals will be set forth in **Article 3 of the General and Supplementary Conditions** for most UC contracts
- Campuses are advised to **include EPD & GWP requirements in the specification section** for each eligible material and BCCA requirements in the Division 1 General Requirements specification section

Material or Product	Materials specifications: CSI
Concrete Reinforcing Steel	Section 03
Structural Steel	Section 05
Flat Glass	Section 08
Mineral Wool board Insulation	Section 07

All Files > UCOP Buy Clean EPD Submittals > Santa Cruz

Name ^



College Eight-Rachel Carson College -Dining Expansion Cap Project NO. 5303-037



_Archive (UCOP only)

All Files > UCOP Buy Clean EPD Submittals > **_FORMS**

Name v



_Do Not Use



2022 UC EPD Collection Summary_COPY ME.xlsx



EXEMPTIONS

Exemption Form will be available for allowable exemptions

- 1. Technically Infeasible** - E.g. The particular material is not covered by the scope of the relevant Product Category Rule (PCR), for example, a type of glass that is not included in the PCR for flat glass.
- 2. Significant Increase in Project Cost-** An EPD is not required if the total material cost for any covered product is less than \$25,000. This cost shall be clearly broken out in the submitted Schedule of Values.



EXEMPTIONS

3. **Significant Time Delay** - In cases where the time required to develop and publish the EPD is significant relative to the duration of the project
4. **One Source for Material (Sole Source)**
5. **Emergency**

*** NOTE – UCOP will have a one-year period for submittal of requested exemptions that require more thorough examination. That period ends on April 14, 2024.**



WHO IS RESPONSIBLE FOR REVIEW AND ENSURING THAT ELIGIBLE MATERIAL AND EPD ARE COMPLIANT

DESIGN PROFESSIONAL- EDPA Supplemental Requirements Article 4.16 specifies that they submit a complete list of all “eligible materials” at 100% CDs; Article 6 requires review of EPDs

AWARDED CONTRACTOR – General and Supplementary Conditions, Article 3 specifies that the contractor is also responsible for compliance

PROJECT MANAGER – PMs role is to make sure that the Contractor and DP do their contractually required work. Make sure that the EPD is valid and compliant before submitting it to UCOP.



WHAT IS REQUIRED OF CAMPUSES & UCOP

- Campuses will
 - Update procurements with the new agreements
 - Collect and **review** EPDs and submit to UCOP
- UCOP will
 - Submit the EPDs and Information reported by campuses to DGS and coordinate any requested clarifications from DGS.
 - Update any Buy Clean California Act requirements in our contracts.
 - Maintain the UC EPD Submittal Box folder and process
- **This is the law.** Please help us spread the word about complying with this requirement.



LESSONS LEARNED

- EPDs are to be **manufacturer and manufacturing facility specific**.
- EPDs must be submitted to campus **prior to installation**
- EPDs must show that materials are **not greater than the acceptable maximum limits** of the GWP as shown on the DGS website.
- Design Professionals and Contractors have **contractual obligations** to ensure that UC is in adherence with the BCCA.
- If eligible material is **coming from abroad** be aware that EPD/PCR is still liable to meet DGS requirements. Recent examples have either been disqualified or required supplemental information from the manufacturer
- Best practice is to include discussion of BCCA and EPDs in your **Pre-bid conference**.



WHAT THE FUTURE HOLDS FOR BCCA

- The requirements will get stricter. The list of materials may be expanded.
- By January 1, 2024, and every three years thereafter, DGS will review the GWP limits for each material and may adjust that number downward.
- In carrying out its duties under this article, **an awarding authority shall strive to achieve a continuous reduction of emissions** over time.
- Cal Green building code and CARB (CA Air Resources Board) will be adding GWP requirements.



WHERE TO FIND BCCA/EPD INFO

1. [BCCA Program Page](#)
2. Construction Contract General and Supplementary Conditions – Art. 3
3. EDPA Supplementary Conditions (Art. 4 and Art. 6)
4. UCOP Box EPD Submittal Folder – *This is where EPDs are submitted*
5. Facility Manual Volumes 3 ([Art. 4.2.9](#)) and 5 ([Art. 11.3.5](#))
6. [DGS Buy Clean CA page](#)

Any questions or for UCOP Box Access email anthony.cimo@ucop.edu

A blurred background image of a grassy field. In the upper left, a large, dark tree trunk is visible. In the upper right, a person wearing a light-colored shirt and blue pants is walking away from the camera. The foreground is a sharp, vibrant green lawn.

Questions?