

**ENVIRONMENTAL BUSINESS COMMITTEE
WHITE PAPER**

**PARTICIPATION OF FIRMS OF ALL SIZES IN HAZARDOUS
WASTE CLEANUP**

The hazardous waste practice is complex and necessitates the use of the most qualified firms in the assessment and cleanup process, regardless of firm size. Small and medium sized firms, like larger firms, also possess unique technical capabilities that can be utilized in the cleanup process to ensure prompt, cost-effective waste cleanups.

There is a growing trend in the federal government whereby environmental restoration services are procured through large quantity contracts. These contracts often preclude the federal government from obtaining the hazardous waste specialty experience that exists within small, small disadvantaged, women-owned, and moderate sized businesses. EBC encourages the federal government to structure hazardous waste cleanup procurements so as to attract the capabilities of firms of all sizes in its remediation projects. EBC also encourages larger firms to seek out the expertise available in these smaller businesses that could be brought into cleanup projects.

EBC believes that the most appropriate way for the federal government to obtain hazardous waste design services, in particular engineering and design services, is through use of the Brooks Architect/Engineer Law (P.L. 92-582) and Qualifications-Based Selection (QBS). Hazardous waste activities are highly complex and can expose third parties to risk of harm. Such activities should therefore be performed by the most capable firms, as is required under the Brooks A/E Act, to ensure that the government obtains the highest quality services. Professional hazardous waste services should not be grouped with non-professional activities such as waste hauling that result in procurement of highly complex professional hazardous waste services by bid instead of by qualifications under QBS.