



COLORADO

Department of Transportation

Office of the Chief Engineer

Materials and Geotechnical Services
4670 Holly Street
Denver, CO 80216

February 10, 2023

PCR Committee

Per Amanda Fisher

Underwriters Laboratories, LLC
333 Pfingsten Road
Northbrook, IL 60062-2096 USA

RE: Proposed redline changes to Product Category Rule (PCR) Guidance for Building-Related Products and Services
Part B: Designated Steel Construction Product EPD Requirements.

Dear PCR Committee members,

You are receiving this letter as the Colorado Department of Transportation (CDOT) is requesting changes to the existing PCR. These changes are relevant now, and as such, are being requested prior to the ISO and ULe Program Operator rules for expiration and update of the existing PCR validity period.

CDOT is requiring EPDs

Based on Colorado House Bill 21-1303, specifically the portion relevant to the Department (Colorado Department of Transportation - CDOT) and as listed under Section 24-92-118 of the Colorado Revised Statutes, Environmental Product Declarations (EPDs) are required to be submitted for eligible materials. CDOT has published a protocol that includes all relevant information for Contractors and CDOT Project Staff to determine which materials require EPD submittals. Steel products as procured by CDOT are part of the eligible materials.

OVERVIEW OF HB 21-1303

House Bill 21-1303 is a bill that was signed into Colorado Law in July of 2021. The bill requires both the Office of State Architect and the Colorado Department of Transportation to establish maximum Global Warming Potential (GWP) for materials used in eligible projects. The overview below is specific only to CDOT's portion of the bill.

By January 1, 2025, CDOT shall establish a policy to determine and record greenhouse gas emissions from eligible materials (listed in the bill as: asphalt and asphalt mixtures, cement and concrete mixtures, and steel) used in a public project with the goal of reducing Greenhouse Gas (GHG) emissions. CDOT shall do so through the use of a nationally or internationally recognized database of EPDs and through development of a tracking/reporting process consistent with the criteria in an EPD. CDOT may establish additional subcategories with distinct GWP limits within each eligible material category listed in the bill.

To establish GWP limits for eligible materials items, CDOT shall require the Contractor who is awarded a contract to submit a current EPD for each of the eligible materials identified by CDOT Bid Item number or inclusive material. CDOT is requesting that these EPDs be facility and product specific.

EPD data collected between July 1, 2022, and December 31, 2024, will be used to establish Global Warming Potential (GWP) limits for eligible materials via CDOT policy.

More information on the eligible projects and materials, and EPD submittal timing can be found in the CDOT [protocol document](#).

Request to the PCR Committee

CDOT has reviewed the current PCR and is requesting the changes attached to this document. Ultimately, they address the need for Contractors to supply EPDs for finished products used in CDOT projects and would satisfy the requirements of Colorado House Bill 21-1303. CDOT began requiring the submission of EPDs for reinforcing steel as of July 1, 2022 and will extend this requirement to other steel products including structural steel as of July 1, 2023.



CDOT greatly appreciates your support as we move forward with our EPD implementation process. We are hopeful that the attached suggestions can be considered and implemented in the immediate future.

If you have any questions related to these comments, please do not hesitate to reach out to us for clarification. I can be reached by phone at 303-398-6501, or by email at craig.wieden@state.co.us. I am available to the PCR committee for discussion to determine actions and timeframes that may be undertaken to address them.

Sincerely,

Craig Wieden

State Materials Engineer
Colorado Department of Transportation





COLORADO

Department of Transportation

Office of the Chief Engineer

Materials and Geotechnical Services
4670 Holly Street
Denver, CO 80216

October 17, 2022

Mr. Cooper McCollum
UL Environment
2211 Newmarket Pkwy SE Suite 106
Marietta, GA 30067

RE: Comments/Requests/Suggestions related to:
Product Category Rule (PCR) Guidance for Building-Related Products and Services
Part B: Designated Steel Construction Product EPD Requirements.

Dear Mr. McCollum:

As you may be aware, the Colorado Department of Transportation (CDOT) has recently begun to collect Environmental Product Declarations (EPDs) on projects as of July 2022 in compliance with Colorado House Bill 21-1303. Our initial EPD collection efforts are geared toward regional benchmarking the Global Warming Potential associated with materials supplied to CDOT projects in conformance with our CDOT specifications, prior to establishing GWP limits by January 2025. Review of published Colorado EPDs led to an in depth review of the Product Category Rule (PCR) Guidance for Building-Related Products and Services, Part B: Designated Steel Construction Product EPD Requirements by our CDOT EPD Implementation Team. Reviews were also conducted on Asphalt Mixtures, Ready Mixed Concrete, and Precast Concrete PCRs and our comments/questions on each of them will be posted to our [CDOT EPD webpage](#). CDOT has also shared and sought input on these comments with other States/Agencies (MNDOT, WSDOT, ODOT, CALTrans, and PANYNJ) that are interested in or are currently pursuing EPD collection efforts as well. The following comments, requests, and suggestions are a result of that review and have been provided primarily as we look ahead to submittal verification/quality assurance and anticipated data granularity needs for our regional benchmarking efforts here in Colorado. Comments specific to your PCR are:

1. To set up regional benchmarks CDOT is requesting mill specific manufacturing data (steel type, supplier, location), transportation to fabricators and fabrication (supplier, location, material efficiency, energy consumption, finishing/surface treatment). CDOT will be requesting this information per July 1st, 2023.
2. Fabrication is particularly important when steel reinforcing is not just plain rebar but has received a coating (currently not present in available EPDs), galvanization (for example for guard rail) (currently not present in available EPDs).
3. CDOT expects EPDs with a breakdown into A1, A2 and A3
4. Consider PCR committee membership for associations not currently represented.
5. Maintenance during the use is not included in the PCR. Exposed products do require maintenance. Consideration should be given to the use phase, especially when in-situ surface treatments are necessary.



6. We recommend to reviewing the PCR and reporting the review in a public document against the ACLCA guidelines <https://aclca.org/pcr/> to assist in transparency and harmonization.
7. We recommend that the Program Operator organizes periodic (at least annual) meetings with third party reviewers to discuss interpretation issues, and potential PCR improvements as part of a continuous improvement process that is not bound by the 5-year PCR update process. This process has been very valuable when implemented in other PCR committees.

CDOT greatly appreciates your support as we move forward with our EPD implementation process. We are hopeful that the comments, questions and suggestions outlined above can be considered and implemented in the immediate future.

If you have any questions related to these comments, please do not hesitate to reach out to us for clarification. I can be reached by phone at 303-398-6501, or by email at craig.wieden@state.co.us. I intend to follow up with you in a week or two to discuss these comments with you and to determine actions and timeframes that may be undertaken to address them.

Sincerely,

Craig Wieden
State Materials Engineer
Colorado Department of Transportation

