Environmentally Preferable Asphalt Standards for all GSA Projects
Revised September 2022

1. The [prime contractor] shall provide a product-specific cradle-to-gate Type III environmental product declaration (EPD) for each asphalt mix specified in the contract and used at the project, using version 2 of the National Asphalt Paving Association’s product category rule for asphalt mixtures. Please send EPD(s) to embodiedcarbon@gsa.gov, and upload EPD(s) into GSA's project management information system.

2. The [prime contractor] shall provide **environmentally preferable asphalt**, which is defined in this context as material manufactured or installed using at least two (2) of the following techniques. Please send each asphalt mix batch design (including type, volume, and a description of the proposed techniques) to embodiedcarbon@gsa.gov, and upload the submittals into GSA's project management information system.

   a. Reclaimed asphalt pavement (RAP) content of 21% or higher (specify percentage, and whether in-place or central plant recycling is used);
   b. Warm mix technology (reduced onsite mix temperature);
   c. Non-pavement recycled content (e.g. roof shingles, rubber, or plastic);
   d. Bio-based or other alternative binders;
   e. Improved energy/ carbon efficiency of manufacturing plants or equipment (e.g. using natural gas or electric to heat materials); or
   f. Other environmentally preferable features or techniques (please specify).

3. These requirements apply to all GSA projects that use at least ten (10) cubic yards of an asphalt mix.

4. If it is not feasible to meet GSA's EPD requirement or to implement at least two of the listed environmentally preferable features or techniques, the [prime contractor] shall ask the GSA project manager to request a **P100 waiver**.

   a. The [prime contractor] shall outline and provide evidence of the specific circumstances that make compliance infeasible. For example, the only asphalt suppliers within the maximum transport range for the mix design:
      i. are small businesses that have not yet invested in EPDs; or
      ii. do not yet offer mixes that use at least two environmentally preferable features or techniques while meeting specific client-driven performance requirements.

   b. Any requests for a waiver from the EPD requirement must include a GWP estimate generated with a tool such as the Federal Highway Administration's LCA Pave Tool or Athena Pavement LCA.

   c. GSA will respond to each complete P100 waiver request with a decision or a request for more detail within ten (10) business days. A complete waiver request is deemed granted if no response is provided within that time.