



# 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 1<sup>st</sup>, 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](mailto: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

