Control Number: [redacted]

JUSTIFICATION REVIEW DOCUMENT
FAR Part 6 Justification and Approval
for Other than Full and Open Competition

Program/Equipment: Washer and Dryer Appliance Maintenance and Repair Services for Installation Support Services at Fort Jackson, South Carolina for the United States Army Command.

Authority: Title 10 U.S.C. §3204(a)(1) as implemented in Federal Acquisition Regulation (FAR) 6.302-1(a)(2)(iii)(B), Unacceptable delays in fulfilling the agency's requirements.

Amount: [redacted]

Prepared by: [redacted]
Contract Officer Date: 12 June 2026
E-mail: [redacted]

Contracting Officer: [redacted]
Contracting Officer Date: 12 June 2026
E-mail: [redacted]

Technical: [redacted]
Contracting Officer Representative Date: 16 June 2026
E-mail: [redacted]

Requirements: [redacted]
Chief, Project Management Branch Date: 16 June 2026
E-mail: [redacted]

Reviews: I have reviewed this justification and find it adequate to support other than full and open competition

Program Manager/Program Executive Officer:
[redacted]
Engineering Division Chief E-mail: [redacted]

[redacted] _____

Control Number: [redacted]

Legal Counsel:
[redacted]
Contract & Fiscal Law Attorney-Advisor E-mail: [redacted]

[redacted] _____

Contracting Officer:
[redacted]
E-mail: [redacted]

[redacted] _____

Control Number: [redacted]

FAR Part 6 Justification and Approval
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1. **Requiring Activity:** Directorate of Public Works, Engineering Division Fort Jackson.

2. **Contracting Activity:** MICC-Fort Jackson.

3. **Description of Action:** Request approval for a bilateral, out-of-scope modification to Contract # W9124C23C0005 with Blue Dog Environmental, Inc. This action is necessary to increase the estimated monthly workload for appliance repair services from 200 to 350 work orders and to renegotiate the firm-fixed price for the upcoming Option Year Three (3). The total estimated value of this modified option year is approximately [redacted] pending negotiations.

4. **Description of Supplies/Services:** This requirement is for the maintenance, repair, removal, and installation of government-owned electric clothes washers and electric/gas clothes dryers. The services also include the critical replacement of dryer exhaust vents. These services are provided for appliances located in various units across the installation. The current contract's estimated workload of 200 work orders per month has proven insufficient, with actual historical data showing a sustained need for approximately 350 work orders per month. This modification adjusts the contract to meet the actual requirement.

5. **Authority Cited:** Title 10 U.S.C. §3204(a)(1) as implemented in FAR 6.302-1(a)(2)(iii)(B), Unacceptable delays in fulfilling the agency's requirements. A delay of approximately 4 to 6 months would occur if this requirement were to be competed, which would introduce severe health, safety, and operational risks to the installation.

6. **Reason for Authority Cited:** The proposed out-of-scope modification to increase the monthly workload from approximately 200 to 350 work orders for Contract W9124C23C0005 must be awarded to the incumbent, Blue Dog Environmental, Inc., under the authority of FAR 6.302-1(a)(2)(iii). Awarding this workload increase to any other source would result in unacceptable delays in fulfilling the agency's requirements and introduce severe health, safety, and operational risks to the installation.

- A. Unacceptable Delays & Break in Service: The actual requirement has surged above the original government estimate. If the Government were to decline this modification and attempt to compete a new contract based on approximately 350 work orders per month, the standard procurement lead time would require a minimum of 4 to 6 months to draft a new solicitation, evaluate proposals, award, and complete contractor phase-in. During this procurement gap, the incumbent would be unable to sustain the 350-order workload at the current fixed price, leading to an immediate backlog of approximately 150 un-serviced work orders per month.

- B. Impact on Mission Readiness and Quality of Life (QoL): These appliances are located in unaccompanied personnel housing (barracks) and family housing. A backlog of broken washers and dryers directly degrades the Quality of Life and hygiene standards for resident service members. Personnel require functional laundry facilities to maintain uniform readiness and personal sanitation. Prolonged outages of these basic services negatively impact morale, readiness, and the command's obligation to provide adequate living conditions.

- C. Life, Health, and Safety Hazards: Beyond basic appliance functionality, this contract includes the maintenance of gas dryers and the replacement of dryer exhaust vents. A failure to immediately execute these specific work orders poses a critical safety risk:

1. Fire Hazards: Clogged or degraded dryer exhaust vents are a leading cause of structural fires. Delaying vent replacement due to procurement timelines poses a direct threat to property and the lives of service members.

2. Gas Leaks: Malfunctioning gas dryers require immediate, specialized attention to prevent natural gas/propane leaks, which pose explosion and inhalation risks.

- D. Unique Capability of the Incumbent: Blue Dog Environmental, Inc. is currently mobilized on-site with established supply chains for appliance parts, properly vetted/badged technicians, and direct knowledge of the installation's facility layouts. Transitioning this critical safety and QoL requirement to a new vendor for the upcoming option period would severely disrupt ongoing maintenance schedules. Therefore, executing a bilateral modification with the incumbent to accurately reflect the 350 work order/month reality is the only viable method to ensure uninterrupted, safe laundry services while the Government prepares a properly scoped follow-on competitive procurement.

7. Efforts to Obtain Competition: No other source is responsible and capable of meeting the entirety of the Government's requirement without causing unacceptable delays or a break in service.

8. Actions to Increase Competition: The Government intends to resolve this barrier to competition by re-baselining the requirement. Before the end of the contract, the Government will draft a new Performance Work Statement (PWS) that accurately reflects the approximately 350 work order/month requirement. This new PWS will be used to compete the follow-on contract via full and open competition, ensuring future awards are based on the correct workload.

9. Market Research: Market research was conducted on 12 June 2025 by reviewing recent similar contracts, searching GSA Advantage and general overall internet search. While the research indicates other vendors exist who could perform this work under a new competitive procurement, no other vendor can mobilize and take over performance

for the upcoming option period without a lengthy transition phase that would result in the unacceptable delays and safety risks detailed in paragraph 6.

10. Interested Sources: N/A

11. Other Facts: The original government estimate of 200 work orders per month was based on historical data from previous years. The significant increase to approximately 350 work orders per month is attributed to an unexpected surge in equipment failures due to aging appliance inventory, a change in operational tempo, and an increase in barracks occupancy rates. This modification corrects the contract scope to align with the current operational reality.

Control Number: [redacted]

12. Technical Certification: I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

[redacted] _____
[redacted]
Contracting Officer Representative

13. Requirements Certification: I certify that the supporting data under my cognizance, which are included in the justification, are accurate and complete to the best of my knowledge and belief.

[redacted] _____
[redacted]
Chief, Project Management Branch

14. Fair and Reasonable Cost Determination: I hereby determine that the anticipated price/cost to the Government for this contract action will be fair and reasonable. This determination will be made using the independent Government estimate. As part of the basis, certified cost or pricing data will not be required.

[redacted] _____
[redacted]
Contracting Officer

15. Contracting Officer Certification: I certify that this justification is accurate and complete to the best of my knowledge and belief.

[redacted] _____
[redacted]
Contracting Officer