

**Memorandum for Record – Limiting Competition
at or below the Simplified Acquisition Threshold**

1. Contracting Activity: U.S. Army Mission and Installation Contracting Command (MICC) - Joint Basel Lewis McChord (JBLM), WA.

2. Description of Action: Directorate of Public Works JBLM requests a firm-fixed price contract with United Pools Maintenance LLC. The Government projects award for 22 August 2025 and fiscal year 2025, Operations and Maintenance funds will be used. An acquisition plan is not required because this procurement does not meet the threshold at Defense Federal Acquisition Regulation Supplement 207.103(d)(i)(B).

Nature: ☒ New Requirement ☐ Follow-on Requirement

Contract Vehicle: ☒ Purchase Order Number W911S8-25-P-#s%)
☐ Blanket Purchase Agreement (BPA) Number _____
☐ Order/BPA# _____ against FSS Contract # _____
☐ Order # _____ against Multiple Award IDIQ Contract
 Name or # _____
☐ Order # _____ against a single award IDC Contract
 # _____
☐ Modification # _____ to existing PO/TO/DO/Call Order
 # _____

Pricing/Contract Type: ☒ Fixed Price ☐ Time & Materials/Labor Hours
☐ Cost Reimbursable ☐ Hybrid

Funds: ☒ Operations & Maintenance, Army (OMA) ☐ Other Funds: _____
 FY: 2025

Name of Proposed Contractor(s) and Address:

USA POOLS OF FLORIDA
1480 WOODSTOCK RD
ROSWELL, GA
30075-2130

Brand Name Buy: ☐ Yes ☒ No

3. Description of Services or Supplies: This requirement is for non-personal services to perform one time repairs for Keeler Pool. The contractor will perform Pool Maintenance for Keeler Pool to replace failing and failed parts. The value of this action is \$ [REDACTED] tabulated as follows:

- Replace sand filter tanks and filter media: \$ [REDACTED]

- Replace circulation pump: \$ [REDACTED]
- Replace BECSys chemical controller: \$ [REDACTED]
- Bleach wash pool: \$ [REDACTED]
- Replace expansion joint: \$ [REDACTED]
- Replace main drain grates: \$ [REDACTED]
- Replace tile and grout: \$ [REDACTED]

Period of Performance: 15 September 2025 to 30 November 2025.

Total Value: \$ [REDACTED]

4. Authority:

☒ FAR 13.106-1(b)(1): For purchases not exceeding the simplified acquisition threshold (SAT), only one source reasonably available, urgency, exclusive licensing agreements, brand name, or industrial mobilization.

5. Reasons for Authority Cited:

a. JBLM requires immediate repairs to its pool facilities. The related contract (W911S823C0016, awarded 2023) is ongoing, but the scope of work exceeds the existing over and above CLIN limit. The current contractor of W911S823C0016 is willing and capable of performing the repairs but is contractually restricted due to funding limitations within the existing contract. The IGCE for this requirement was developed prior to seeking a quote from the contractor. We confirmed the materials and their prices using Grainger.com, which is a publicly available catalog for business and industrial supplies. The pricing was deemed fair and reasonable as the maintenance needed requires putting in new components that have failed or are already failing. Historically, the acquisition has been fraught with problems getting contractors able and willing to meet the requirement.

b. Based on the urgency to get Soldiers back to training to meet their mission, a Justification and Approval was signed pursuant to FAR 13.106-1(b)(1): For purchases not exceeding the simplified acquisition threshold (SAT), only one source reasonably available, urgency, exclusive licensing agreements, brand name, or industrial mobilization. Based on the data herein, full and open competition is not recommended at this time due to the urgent need, contractual limitations, and the history of price volatility and technical bid acceptability issues. The KO has determined that a sole source requirement to the current contractor leverages existing performance, minimizes delays, and ensures faster project completion.

6. Publicizing Contract Actions: For FAR Part 13 actions, the public display and synopsis requirements of FAR 5.101 and FAR 5.203 ☐ do not apply due to the \$ threshold, ☐ apply and will be followed, or ☒ do not apply due to an exception at FAR 5.202, the current closure of the pool negatively affects the Army's ability to maintain the required operational readiness levels, with the inability for SCUBA certification for deployment.

Requirement to post justification in accordance with FAR 8.405-6(b)(3), FAR 13.105(c), or FAR 16.505(a)(4)(iii)(A) unless:

- ☒ Action is NOT a brand name restriction and is under \$250K, no posting required.
- ☐ Action is a brand name restriction, under \$25K, no posting required.
- ☐ Action is a brand name restriction, over \$25K. It will be redacted and posted with the solicitation.
- ☐ Action is a brand name restriction over \$25K but will not be posted due to the following exception:
 - ☐ FAR 6.305(f)
 - ☐ FAR 8.405-6(b)(3)(ii)(A)
 - ☐ FAR 8.405-6(b)(3)(ii)(B)
 - ☐ FAR 8.405-6(b)(3)(ii)(C)
 - ☐ FAR 16.505(a)(4)(iii)(C)

7. Market Research: Not applied, per FAR 6.302-2 Unusual and compelling urgency.

8. Other Facts:

a. Procurement History

Contract number: W911S823C0016
Vendor: United Pools Maintenance LLC
Award date: 8 September 2023
Competitive Status: Restricted, Small Business, Set Aside 100%
Authority cited: FAR 19.502-2(a)

b. The requirement is urgent as training is done in this Pool. Currently the pool is closed thereby affecting operational readiness.

c. The JBLM Pool maintenance was previously done by DPW prior to the current ongoing contract. The contract was solicited in UNISON in 2023 and awarded to 100% small business set aside. The current contract is performing the maintenance satisfactorily, but the nature of this acquisition is beyond the scope of the current contract as it is written. This therefore requires a standalone contract which will also be solicited to the incumbent with Justification and Approval based on urgency.

9. Technical/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.

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John Wao
Project Manager

10. Contracting Officer Certification/Approval: I hereby determine that the anticipated cost or price to the Government for this contract action will be fair and reasonable based upon the IGCE, as a part of this basis, certified cost or pricing data is not required because the item and/or services being acquired are considered commercial.

I certify that this justification is accurate and complete to the best of my knowledge and belief, and that completing this purchase as a sole source is in the best interest of the Government. Additionally, I approve this justification to limit competition subject to the availability of funds and provided that the services or supplies herein described have otherwise been authorized for acquisition.

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Jason McCormick
Contracting Officer