



American Iron and Steel (AIS) Guidance for Clean Water and Drinking Water State Revolving Fund Projects

This document is not a comprehensive representation of the federal requirements. For complete details of the federal requirements visit:

<https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement>

In any instance when there may be a discrepancy between this guidance and the actual federal requirements, program participants must adhere to the federal requirements.

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Forms and Guidance

The Texas Water Development Board (TWDB) forms and guidance documents noted in this instruction document may be accessed through the TWDB Financial Assistance website at:

<https://www.twdb.texas.gov/financial/instructions/index.asp>

Search by either the document number or name.

I. Overview

It is the intent of the Texas Water Development Board (TWDB) to ensure that Applicants, Consultants and Contractors are provided with procedures and recommendations for implementation of the American Iron and Steel (AIS) provisions for the Clean and Drinking Water State Revolving Funds. These provisions are currently contained in Section 608 of the Federal Water Pollution Control Act (33 U.S.C. §1388) for the Clean Water State Revolving Fund (CWSRF) program and in federal laws, including the federal appropriation acts and Section 1452(a)(4) of the Safe Drinking Water Act (42 U.S.C. §300j-12(a)(4)), as applicable, for the Drinking Water State Revolving Fund (DWSRF) program.

The AIS provisions require CWSRF and DWSRF Applicants to use iron and steel products that are produced in the United States for projects for the construction, alteration, maintenance, or repair of a public water system or treatment works. For the CWSRF program, the AIS requirements apply only to the construction, alteration, maintenance, or repair of treatment works¹ projects. For the DWSRF program, the AIS requirements apply to all public water system projects. Based on the statutory provisions, the effective date depends on the date the TWDB loan was closed and varies by program.

In this document, the Applicant refers to the entity, or recipient, that receives funding from the TWDB.

II. Effective Dates

Effective dates for AIS provisions are as follows.

CWSRF

If the loan closes on or after October 1, 2014:	
(a) If the Plans and Specifications for the project were approved by TWDB prior to June 10, 2014	Exempt from AIS
(b) If the Plans and Specifications for the project were approved by TWDB on or after June 10, 2014	AIS applies

DWSRF

The American Iron and Steel provisions generally apply to any financial assistance closed on or after January 17, 2014. There may be statutory exceptions to the AIS requirements based on the date of approval of plans and specifications by a state agency. The Applicant should contact the project's TWDB Project Manager if there are questions regarding AIS exceptions.

¹ "Treatment works" is defined in 33 U.S. Code §1292 (2).

CWSRF and DWSRF

Planning, Acquisition, and Design funded separately from the Construction Phase:

If the original loan for the planning and/or design of a project closed prior to January 17, 2014, then the AIS provision would not apply to the construction phase of the same project.

III. United States (U.S.) Environmental Protection Agency (EPA) Guidance

EPA has provided guidance through the following resources:

1. American Iron and Steel Requirement Guidance (March 20, 2014)
www.epa.gov/sites/default/files/2015-09/documents/ais-final-guidance-3-20-14.pdf (**Attachment 1**)
2. Questions and Answers Part 1: Valves and Hydrants (May 30, 2014)
www.epa.gov/sites/default/files/2018-05/documents/ga_part_1.pdf (**Attachment 2**)
3. Questions and Answers Part 2: Products, Projects and Process (September 10, 2014) www.epa.gov/sites/default/files/2015-09/documents/ais-qanda-part-2_sept102014_final_0.pdf (**Attachment 3**)
4. Questions and Answers Part 3: Plans and specifications dates, Refinancing and Coatings (March 16, 2015) www.epa.gov/sites/default/files/2015-09/documents/ais-qanda-part-3-mar-2015_final-for-posting_0.pdf (**Attachment 4**)
5. EPA's American Iron and Steel webpage, <https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement>

Please contact TWDB with any questions regarding the applicability of AIS requirements.

IV. Covered Iron and Steel Products

If the project receiving CWSRF or DWSRF funds must comply with the AIS requirements, then all covered iron and steel products must be made in the United States, no matter whether the CWSRF or DWSRF was the source of funds used to purchase a particular covered iron and steel product. The Applicant may not use funds from non-State Revolving Fund sources, including the Applicant's own funds, to pay for a non-compliant iron or steel product used in the project.

AIS requirements apply to the following products made primarily of iron or steel, permanently incorporated into the public water system or treatment works:

- Lined or unlined pipes or fittings;
- Manhole Covers;
- Municipal Castings;
- Hydrants;
- Tanks;
- Flanges;
- Pipe clamps and restraints;
- Valves;
- Structural steel;
- Reinforced precast concrete; and
- Construction materials.

Mechanical and electrical components, equipment, and systems are not considered iron and steel products, and are exempt from AIS requirements. Mechanical equipment is typically that which has motorized parts and/or is powered by a motor. Electrical equipment is typically any machine powered by electricity and includes components that are part of the electrical distribution system.

V. Waivers

AIS provisions permit EPA to issue waivers for a case or category of cases where EPA finds (1) that applying these requirements would be inconsistent with the public interest; (2) iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality; or (3) inclusion of iron and steel products produced in the United States will increase the cost of the overall project by more than 25 percent.

EPA has granted nationwide waivers, which are attached hereto as **Attachment 5**:

1. De Minimis waiver pursuant to Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA) (April 15, 2014). The De Minimis waiver permits the use of products when they occur in de minimis incidental components to the project. Funds used for de minimis incidental components cumulatively may not exceed 5% of the total cost of the materials used in and incorporated into the project; the cost of an individual item may not exceed 1% of the total cost of materials used in and incorporated into the project.
2. Nationwide Plans and Specs waiver pursuant to Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA). (April 15, 2014)

3. National Product Waiver for Pig Iron and Direct Reduced Iron (February 18, 2015).
4. National Product Waiver for Minor Components in Iron and Steel Products (with Cost Ceiling) (October 27, 2015).
5. **Expired** Final Extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts Used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles (August 24, 2018). *The Final Extension for short-term National Product Waiver for Stainless Steel Nuts and Bolts used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles short-term American Iron and Steel (AIS) waiver for stainless steel nuts and bolts expired on February 24, 2020. All coupling type products specifically mentioned in the waiver (couplings flanges restraints, etc.) that contain non-domestic stainless steel nuts and bolts should have been purchased by the project/SRF recipient before the expiration date. If purchased after the expiration date, the stainless steel nuts and bolts in those specific products are no longer covered by a waiver.*

EPA's American Iron and Steel webpage includes any waivers issued – www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement with approved national waivers at www.epa.gov/cwsrf/american-iron-and-steel-requirement-approved-national-waivers-0. The following waivers are expired, but still available for viewing on the EPA's website:

1. **Expired** Short-Term National Product Waiver for Stainless Steel Nuts and Bolts used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles (February 18, 2015) *This national waiver was extended each year for five years but has now expired, see Item 5, above.*
2. **Expired** One-Year Extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts Used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles (February 22, 2016). *This national waiver has now expired, see Item 5, above.*
3. **Expired** One-year Extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts Used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles (January 18, 2017). *This national waiver has now expired, see Item 5, above.*

1. Waiver Process

EPA has implemented a waiver application process to allow the State, on behalf of the Recipient, to apply for waivers of the AIS requirement directly to EPA Headquarters. Only waiver requests received from the State (e.g., TWDB) will be considered. A waiver application may be submitted at any time during the project, however until a waiver is granted by EPA, the AIS requirement stands.

To apply for a project waiver, the Recipient should email the request in the form of a Word document (.doc) to the TWDB Project Manager. Proper and sufficient documentation must be provided by the Recipient, refer to **Attachment 6**.

After receiving an application for waiver of the AIS requirements, EPA Headquarters will publish the request on its website for 15 days and receive informal comment. EPA Headquarters will then determine whether the application properly and adequately documents and justifies the statutory basis cited for the waiver – that it is quantitatively and qualitatively sufficient – and to determine whether or not to grant the waiver.

EPA will notify TWDB that a waiver request has been approved or denied as soon as such a decision has been made. Approved waivers will be posted on the EPA website. The Recipient should keep a copy of the signed waiver in their AIS Certification File.

2. Compliance

To ensure compliance with the AIS requirement, specific AIS contract language must be included in each contract, including the construction material purchase agreements. The Applicant should be aware that AIS requirements will apply to the project through the TWDB commitment resolution. Sample Construction Contract Language is included in **Attachment 7**.

It is the Recipient's responsibility to (1) ensure that all construction and purchase contracts are executed in compliance with AIS, and (2) maintain a record of all forms and certifications necessary to demonstrating compliance with AIS. To demonstrate compliance with AIS requirements either the final manufacturer that delivers the iron or steel product to the worksite, vendor, or contractor, may provide a certification asserting that all manufacturing processes occurred in the United States, or the Recipient may use step certification process, similar to the Federal Highway Administration (See Attachment 8). The Recipient is responsible for monitoring De Minimis Logs to ensure all iron and steel products listed on the log meet the requirements of the EPA's De Minimis waiver.

TWDB relies on self-certification by the Recipient to document compliance with AIS, and requires the Recipient to submit a Monthly American Iron and Steel Certificate of Compliance Submittal ([TWDB-1106-A](#)) with **each outlay report** covering requests for funds associated within construction contracts. Failure to submit the Monthly American Iron and Steel Certificate of Compliance could delay the release of funds.

3. TWDB Compliance Procedures

To be in compliance and satisfy TWDB's requirements for implementation of AIS requirements, Recipients need to do the following:

1. The Recipient shall prepare and submit any waiver request to the TWDB Project Manager. TWDB will forward all requests to EPA. **Any waiver to the AIS requirements must be issued by the EPA.** Until a waiver is approved by EPA, all AIS requirements must be met. A checklist detailing the types of information required for a waiver to be processed, and EPA's waiver determination checklist is attached as **Attachment 6**.
2. Recipients **shall** include the following language in the Advertisement for Bids for all applicable construction contracts funded by the TWDB's CWSRF or DWSRF:

For CWSRF

Any contract(s) awarded under this Invitation for Bids is/are subject to the American Iron and Steel (AIS) requirements of Section 608 of the Federal Water Pollution Control Act (33 U.S.C. §1388).

For DWSRF

Any contract(s) awarded under this Invitation for Bids is/are subject to the American Iron and Steel (AIS) requirements of federal law, including federal appropriation acts and Section 1452(a)(4) of the Safe Drinking Water Act (42 U.S.C. §300j-12(a)(4)), as applicable.

3. Recipients **shall** include the AIS requirements in all applicable construction contracts. Sample contract language is included in **Attachment 7**.
4. Recipients **shall** include the following language on the General Notes Plan Sheet(s).

For CWSRF

This project is subject to the American Iron and Steel (AIS) requirements of Section 608 of the Federal Water Pollution Control Act (33 U.S.C. §1388). All iron and steel products for construction, alteration, maintenance, or repairs incorporated in these plans must be produced in the United States.

For DWSRF

This project is subject to the American Iron and Steel (AIS) requirements of federal law, including federal appropriation acts and Section 1452(a)(4) of the Safe Drinking Water Act (42 U.S.C. §300j-12(a)(4)), as applicable. All iron and steel products for construction, alteration, maintenance, or repairs incorporated in these plans must be produced in the United States.

5. The Recipient, thru the Prime Construction Contractor, must obtain certifications from the final manufacturer that delivers the iron and steel product to the worksite, vendor, or contractor asserting that all manufacturing processes occurred in the United States (Version 1 of the sample letter in **Attachment 8**). For products not delivered to the project site, the Recipient, thru the Prime

Contractor, must obtain the Final Manufacturer's certification from the supplier (Version 2 of the sample letter in **Attachment 8**). The supplier must certify that the products being provided to the Contractor for the project are AIS compliant and the Contractor and Recipient must retain copies of the supplier's certification. **Note:** EPA has determined that a comparable manufacturer's certification letter that makes reference to the USDA Rural Utilities Service Water and Environmental Programs' American Iron & Steel requirements instead of EPA's AIS requirements would be acceptable.

6. The Prime Construction Contractor and Recipient are responsible for inspecting iron and steel products for any readily visible identification labels indicating the country of origin. Note: A country of origin stamp alone is not sufficient verification of compliance with AIS and should not be solely relied upon to ensure compliance.
7. The Prime Construction Contractor and Recipient will be required to maintain a file that contains the certifications from the final manufacturers, any approved waivers, and the De Minimis log. This file must be available for review by TWDB representatives. Sample Certification letters, step certification log, and De Minimis Log are included in **Attachment 8**.
8. The Recipient must submit a Monthly American Iron and Steel Certificate of Compliance Submittal ([TWDB-1106-A](#)) with each outlay report requesting funds associated with construction contracts (i.e., covering construction-related invoices), **Attachment 9**.
9. The Recipient will provide a final certification ([TWDB-1106-C](#)), after the completion of the construction contract and prior to issuance of a Certificate of Approval by the TWDB, stating the project was completed in compliance with the AIS requirements, **Attachment 10**.

4. Recommendations and Best Management Practices

The following recommendations are not required but should be considered by the applicant in implementation of the AIS requirements:

1. AIS requirements should be addressed in the engineering feasibility study to determine availability of AIS products and determine if any requests for waivers need to be initiated.
2. While a waiver application may be submitted at any time during the project, the Applicant should consider EPA's review schedule (15-day comment period plus review time) when scheduling projects. It is not recommended to request a waiver after the advertisement for bids or start of construction.
3. Develop procedures for maintaining a record of AIS documentation.
4. Distinguish separate bid items that must comply with AIS requirements on the Bid Form.

5. Consideration of AIS compliance documentation when developing the contractor submittal procedures for shop drawings, material lists, and manufacturer certifications, etc.
6. Discuss AIS requirements during pre-bid conference and pre-construction meetings, to address contractor's responsibilities, and availability of iron and steel products needed to complete the project.

Attachment 1 – American Iron and Steel Requirement Guidance (March 20, 2014)

(Double click on the embedded Acrobat version below for a clear copy of the document, available at www.epa.gov/sites/default/files/2015-09/documents/ais-final-guidance-3-20-14.pdf)



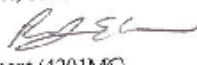
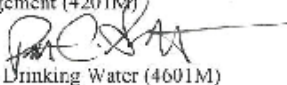
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 20 2014

OFFICE OF WATER

MEMORANDUM

SUBJECT: Implementation of American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act, 2014

FROM: [w] Andrew D. Sawyers, Director 
Office of Wastewater Management (4201M)
Peter C. Grevatt, Director 
Office of Ground Water and Drinking Water (4601M)

TO: Water Management Division Directors
Regions I - X

P.L. 113-76, Consolidated Appropriations Act, 2014 (Act), includes an "American Iron and Steel (AIS)" requirement in section 436 that requires Clean Water State Revolving Loan Fund (CWSRF) and Drinking Water State Revolving Loan Fund (DWSRF) assistance recipients to use iron and steel products that are produced in the United States for projects for the construction, alteration, maintenance, or repair of a public water system or treatment works if the project is funded through an assistance agreement executed beginning January 17, 2014 (enactment of the Act), through the end of Federal Fiscal Year 2014.

Section 436 also sets forth certain circumstances under which EPA may waive the AIS requirement. Furthermore, the Act specifically exempts projects where engineering plans and specifications were approved by a State agency prior to January 17, 2014.

The approach described below explains how EPA will implement the AIS requirement. The first section is in the form of questions and answers that address the types of projects that must comply with the AIS requirement, the types of products covered by the AIS requirement, and compliance. The second section is a step-by-step process for requesting waivers and the circumstances under which waivers may be granted.

Attachment 2 – Questions and Answers Part 1: Valves and Hydrants (May 30, 2014, updated October 27, 2015)

(Double click on the embedded Acrobat version below for a clear copy of the document, available at https://www.epa.gov/sites/default/files/2018-05/documents/qa_part_1.pdf)

May 30, 2014

American Iron & Steel (AIS) Requirement of the Consolidated Appropriations Act of 2014 (Public Law 113-76) Q&A Part 1: Valves and Hydrants

Q1: Does the AIS requirement of the Consolidated Appropriations Act of 2014 require minor, miscellaneous components within a covered valve or hydrant, such as nuts, bolts and washers, to be made in the U.S.?

A1: The definition of "iron and steel products" that must either be domestically produced or subject to a waiver in order to comply with the AIS requirement of the Consolidated Appropriations Act of 2014

Question 1 has been superseded by the National Minor Components Waiver signed on October 27, 2015. This waiver can be found here: https://www.epa.gov/sites/production/files/2015-10/documents/minor_components_waiver_signed_10_27_15_508.pdf

products" that must either be made domestically, or otherwise must comply with the AIS requirement. The minor components represent a very small percentage of the iron and steel in the hydrants and valves that are defined as "iron and steel products." These minor components, which EPA has learned through our research are currently difficult to find domestically in sufficient quantity, such as minor nuts, bolts, and washers, are not required to be of U.S. origin.

Q2: Do the actuators/control systems attached to valves have to comply with the AIS requirement, or just the valve itself?

A2: The AIS requirement of the Consolidated Appropriations Act of 2014 includes valves in its definition of "iron and steel products" that recipients must make certain are either domestically made or subject to a waiver in order to comply with the AIS requirement. Actuators and control systems are not included in the definition. Only the valve itself is required to be either domestically produced or subject to a waiver in order to be compliant with the AIS requirement. Absent a waiver, EPA considers valves and hydrants to be domestically produced if the significant iron and steel components of a covered valve or hydrant – the body, bonnet, shoe, stem, and wedge/disc/gate/ball – if made of iron or steel, is produced in the U.S. See Q1 above for a discussion about minor components. The valves and actuators, while often purchased and shipped together, are two unique products that are manufactured separately and typically attached together during the final step of the process. Valves are included in the definition of "iron and steel products" in the AIS requirement. Actuators, whether manual, electric, hydraulic or pneumatic, are not listed as an "iron and steel product" under the AIS requirement of the Consolidated Appropriations Act of 2014, nor are they considered construction materials. Therefore, they do not need to be domestically produced in the U.S. in order to comply with the requirement.

Attachment 3 – Questions and Answers Part 2: Products, Projects, and Process (September 10, 2014)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at https://www.epa.gov/sites/default/files/2015-09/documents/ais-ganda-part-2_sept102014_final_0.pdf)

September 10, 2014

American Iron & Steel (AIS) Requirement of the Consolidated Appropriations Act of 2014
(Public Law 113-76)

Q&A Part 2

PRODUCT QUESTIONS

1. Q: Do all fasteners qualify for de minimis exemption?

A: No. There is no broad exemption for fasteners from the American Iron and Steel (AIS) requirements. Significant fasteners used in SRF projects are not subject to the de minimis waiver for projects and must comply with the AIS requirements. Significant fasteners include fasteners produced to industry standards (e.g., ASTM standards) and/or project specifications, special ordered or those of high value. When bulk purchase of unknown-origin fasteners that are of incidental use and small value are used on a project, they may fall under the national de minimis waiver for projects. The list of potential items could be varied, such as big-box/hardware-store-variety screws, nails, and staples. The key characteristics of the items that may qualify for the de minimis waiver would be items that are incidental to the project purpose (such as drywall screws) and not significant in value or purpose (such as common nails or brads). See the following: http://water.epa.gov/grants_funding/upload/Deminimis-Waiver-04-15-14.pdf.

EPA also clarifies that minor components of two listed products – valves and hydrants – may not need to meet the AIS requirements if the minor components comprise a very small quantity of minor, low-cost fasteners that are of unknown origin. See EPA's questions and answers on the subject at the following: http://water.epa.gov/grants_funding/upload/AIS-QandA-Part-1-Valves-and-Hydrants-final.pdf.

2. Q: Does PCCP pipe have to be domestically produced?

A: Yes. Pre-stressed concrete cylinder pipe (PCCP) or other similar concrete cylinder pipes would be comparable to pre-cast concrete which is specifically listed in the Consolidated Appropriations Act of 2014 as a product subject to the AIS requirement.

3. Q: If the iron or steel is made from recycled metals will the vendor/supplier have to provide a certification document certifying that the recycled metals are domestically produced?

A: No. Recycled source materials used in the production of iron and steel products do not have to come from the U.S. Iron or steel scrap, for instance, are considered raw materials that may come from anywhere. While certification is not required for the raw material, EPA does recommend that additional final processing of iron and steel be certified to have occurred in the U.S.

4. Q: Do tanks used for filtration systems, if delivered to the construction site separately and then filled with filtration media onsite, have to be domestically produced?

Attachment 4 – Questions and Answers Part 3: Plans and Specifications Dates, Refinancing and Coatings (March 16, 2015)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at https://www.epa.gov/sites/default/files/2015-09/documents/ais-ganda-part-3-mar-2015_final-for-posting_0.pdf)

March 2015

American Iron & Steel Requirement for the Clean Water and Drinking Water State Revolving Funds

Q&A Part 3

***For CWSRF and DWSRF:** On January 17, 2014, Public Law 113-76, the "Consolidated Appropriations Act, 2014," was enacted and included an American Iron and Steel requirement for the Clean Water and Drinking Water State Revolving Fund programs through the end of fiscal year 2014. Since then, the AIS requirement has continued for both programs, but through different statutes, with a few changes as described in the questions and answers provided below.*

***For CWSRF:** On June 10, 2014, the Water Resources Reform and Development Act amended the Clean Water Act to include permanent requirements for the use of AIS products in CWSRF assistance agreements. Section 608 of the CWA now contains requirements for AIS that repeat those of the Consolidated Appropriations Act, 2014. All CWSRF assistance agreements must comply with Section 608 of the CWA for implementation of the permanent AIS requirement.*

***For DWSRF:** On December 16, 2014, the President signed Public Law 113-235, the "Consolidated and Further Continuing Appropriations Act, 2015," which provides fiscal year 2015 full-year appropriations through September 30, 2015. This law continues the requirement for the use of AIS products in DWSRF assistance agreements through September 30, 2015.*

CWSRF PROGRAM

1. **Q:** The Water Resources Reform and Development Act amended the Clean Water Act to include permanent requirements for the use of AIS for CWSRF funded assistance agreements. Does the CWA include an exemption for plans and specifications approved prior to the enactment of the legislation similar to the exemption included in the Consolidated Appropriations Act (CAA) 2014?

A: Yes. The WRRDA amendment to the CWA, which included AIS requirements, included a similar exemption as the CAA 2014. For any CWSRF assistance agreement signed on or after October 1, 2014, if the plans and specifications were approved prior to June 10, 2014 (the enactment of WRRDA), then the project is exempt from AIS requirements. For assistance agreements signed prior to October 1, 2014, the previous dates in the CAA 2014 apply (see March 20, 2014, AIS guidance document).

If a project does not require approved engineering plans and specifications, the bid advertisement date will count in lieu of the plans and specifications approval date for purposes of this exemption in Section 608 (f).

The following table summarizes AIS exemptions based on the plans and specifications approval date for CWSRF funded projects.

3/16/2015

Attachment 5 – EPA Approved Waivers

1. De Minimis Waiver pursuant to Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA) (April 15, 2014)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at <https://www.epa.gov/cwsrf/de-minimis-waiver-pursuant-section-436-pl-113-76-consolidated-appropriations-act>)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

DECISION MEMORANDUM

SUBJECT: De Minimis Waiver of Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA), 2014

FROM: Nancy K. Stoner
Acting Assistant Administrator

The EPA is hereby granting a nationwide waiver pursuant to the "American Iron and Steel (AIS)" requirements of P.L. 113-76, Consolidated Appropriations Act, 2014 (Act), section 436 under the authority of Section 436(b)(1) (public interest waiver) for de minimis incidental components of eligible water infrastructure projects. This action permits the use of products when they occur in de minimis incidental components of such projects funded by the Act that may otherwise be prohibited under section 436(a). Funds used for such de minimis incidental components cumulatively may comprise no more than a total of 5 percent of the total cost of the materials used in and incorporated into a project; the cost of an individual item may not exceed 1 percent of the total cost of the materials used in and incorporated into a project.

P.L. 113-76, Consolidated Appropriations Act, 2014 (Act), includes an "American Iron and Steel" (AIS) requirement in section 436 that requires Clean Water State Revolving Loan Fund (CWSRF) and Drinking Water State Revolving Loan Fund (DWSRF) assistance recipients to use specific domestic iron and steel products that are produced in the United States if the project is funded through an assistance agreement executed beginning January 17, 2014 (enactment of the Act), through the end of Fiscal Year 2014, unless the agency determines it necessary to waive this requirement based on findings set forth in Section 436(b). The Act states, "[the requirements] shall not apply in any case or category of cases in which the Administrator of the Environmental Protection Agency... finds that (1) applying subsection (a) would be inconsistent with the public interest;" 436(b)(1).

In implementing section 436 of the Act, the EPA must ensure that the section's requirements are applied consistent with congressional intent in adopting this section and in the broader context of the purposes, objectives, and other provisions applicable to projects funded under the SRF. Water infrastructure projects typically contain a relatively small number of high-cost components incorporated into the project. In bid solicitations for a project, these high-cost components are generally described in detail via project specific technical specifications. For these major components, utility owners and their contractors are generally familiar with the conditions of availability, the potential alternatives for each detailed specification, the approximate cost, and the country of manufacture of the available components.

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2. Nationwide Plans and Specifications Waiver pursuant to Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA) (April 15, 2014)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at <https://www.epa.gov/cwsrf/nationwide-plans-and-specs-waiver-pursuant-section-436-pl-113-76-consolidated-appropriations>)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

DECISION MEMORANDUM

SUBJECT: Plans and Specifications Waiver of Section 436 of P.L. 113-76, Consolidated Appropriations Act (CAA), 2014

FROM: Nancy K. Stoner
Acting Assistant Administrator

The EPA is hereby granting a nationwide waiver of the American Iron and Steel requirement pursuant to Section 436(b)(1) (public interest waiver), of the Consolidated Appropriations Act (CAA), 2014, for eligible projects that had engineering plans and specifications submitted to an appropriate state agency prior to and including January 17, 2014, the date of enactment of the CAA, and approved between and including January 17, 2014, and the date of this waiver, where the state agency that approved such plans and specifications did so under the normal course of business for that agency. This action permits the use of non-domestic iron and steel products in such projects funded by a Clean or Drinking Water State Revolving Fund that may otherwise be prohibited under section 436.

If a project does not require approved engineering plans and specifications, the bid advertisement date will count in lieu of the plans and specifications approval date for purposes of this national waiver.

The basis for the nationwide waiver is that due to the uncertainty about whether an American Iron and Steel requirement would be included in this year's appropriation, potential assistance recipients did not have the opportunity to plan for a possible American Iron and Steel requirement. Until detailed guidance was issued, potential assistance recipients were unable to solicit bids from construction firms with appropriate definitions of key terms contained in the CAA language. Additionally, projects that submitted engineering plans and specifications prior to and including January 17, 2014, without knowledge of the American Iron and Steel requirement, and with the anticipation that such plans would be quickly approved, but such approval did not occur until on or after January 17, 2014, would be required to redesign elements of the project, investigate potential domestic products, revise engineering drawings and bid specifications, and resubmit such plans and specifications for approval, thereby delaying the initiation of construction substantially. Those projects which do not require approved plans and specifications, but were bid prior to the guidance being issued, also could be required to rebid the project or submit change orders to comply with the new requirements, which would also delay initiation of construction.

3. National Product Waiver for Pig Iron and Direct Reduced Iron (February 18, 2015)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at <https://www.epa.gov/cwsrf/national-product-waiver-pig-iron-and-direct-reduced-iron>)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 18 2015

OFFICE OF WATER

DECISION MEMORANDUM

SUBJECT: National Product Waiver for Pig Iron and Direct Reduced Iron for State Revolving Fund Projects

FROM: *Allen K. Kopocis*
Kenneth J. Kopocis
Deputy Assistant Administrator

The U.S. Environmental Protection Agency is hereby granting a national product waiver pursuant to the "American Iron and Steel" provisions of the Clean Water Act and Public Law 113-235, the "Consolidated and Further Continuing Appropriations Act, 2015," for certain intermediate goods used in the manufacture of iron and steel products.¹ This waiver permits the use of pig iron and direct reduced iron manufactured outside of the United States in domestic manufacturing processes for iron and steel products used in projects funded by a Clean Water or Drinking Water State Revolving Fund that may otherwise be prohibited absent this waiver. The waiver is retroactive and thus also applies to the use of non-domestic pig iron and direct reduced iron before the signature date.

Background: Pig iron and direct reduced iron are intermediate products of iron and steel manufacturing used as material feed sources in iron and steel foundries and steel mills. Pig iron is a product of iron ore smelting in a blast furnace. It is made from molten iron, which has been cast in the shape of "pigs" as it comes from the blast furnace. Direct reduced iron ore is produced from iron ore, pellets or fines, which are reduced in a solid state using natural gas. Hot briquetted iron, or HBI, is a compacted form of direct reduced iron with enhanced physical characteristics for shipment and storage.

Coverage: This waiver permits the use of iron and steel products that were manufactured using non-domestic pig iron and direct reduced iron in projects that receive funds from either the CWSRF or DWSRF. Any project that received or will receive funds from the CWSRF or DWSRF beginning with the enactment of P.L. 113-75, the "Consolidated Appropriations Act, 2014," may use this waiver for iron and steel that use these intermediate goods.

Rationale: The AIS provisions require CWSRF and DWSRF assistance recipients to use specific domestic iron and steel products that are produced in the United States if the project is funded

¹ Absent a waiver, all treatment works and drinking water facilities that are constructed, in whole or in part, with funds from the CWSRF or the DWSRF, must use American made iron and steel. EPA is allowed under certain circumstances to provide waivers of this requirement.

4. National Product Waiver for Minor Components in Iron and Steel Products (with Cost Ceiling) (October 27, 2015)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at <https://www.epa.gov/cwsrf/national-product-waiver-minor-components-iron-and-steel-products>)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 27 2015

OFFICE OF WATER

DECISION MEMORANDUM

SUBJECT: National Product Waiver for Minor Components within Iron and Steel Products (with Cost Ceiling) for State Revolving Fund Projects

FROM: Kenneth J. Kopocis *Kenneth J. Kopocis*
Deputy Assistant Administrator

The U.S. Environmental Protection Agency is hereby granting a national product waiver pursuant to the "American Iron and Steel" provisions of the Clean Water Act and Public Law 113-235, the "Consolidated and Further Continuing Appropriations Act, 2015," (hereinafter referred to as "the Acts") for minor components within a product under an established cost ceiling.¹ The waiver will permit projects funded by the Clean Water State Revolving Fund or Drinking Water State Revolving Fund to use non-domestically produced miscellaneous minor components within an otherwise domestically produced iron and steel product for up to 5 percent of the total material cost of the product. These products could be prohibited absent this waiver. This waiver is retroactive, and so also applies to products purchased before the signature date of this waiver.

Coverage: The items covered by this waiver include miscellaneous minor components within iron and steel products as defined in the AIS provisions of the Acts. The specific minor components in covered iron and steel products will vary by product and manufacturer. Pursuant to this waiver, non-domestically produced miscellaneous minor components comprising up to 5 percent of the total material cost of an otherwise domestically produced iron and steel product may be used. This waiver does not exempt the whole product from the AIS requirements, and the primary iron or steel components of the product must be produced domestically. Unless subject to a separate waiver, all other iron and steel components in these products must still meet the AIS requirements. Valves and hydrants are also subject to the cost ceiling requirements described here. This waiver supersedes the EPA's previous guidance issued on May 30, 2014, (Question 1) related to minor components in valves and hydrants.

The coverage of this waiver is different from that of the existing national de minimis waiver. While the national de minimis waiver covers entire products (when those products are generally of low cost and incidental to the construction of the project), this waiver covers minor components within an iron and steel product. In addition, the national de minimis waiver is intended for assistance recipients to use for their projects, while this minor components waiver is intended to allow manufacturers to certify that their products comply with the AIS requirements.

¹ Absent a waiver, all treatment works and drinking water facilities that are constructed, in whole or in part, with funds from the CWSRF or the DWSRF, must use American made iron and steel. The EPA is allowed under certain circumstances to provide waivers of this requirement.

5. (Expired) Final Extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts Used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles (August 24, 2018)

(Double click on the embedded Acrobat version below for a clear copy of the entire document, available at <https://www.epa.gov/cwsrf/final-18-month-extension-national-product-waiver-stainless-steel-nuts-and-bolts-august-24>)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 24 2018

DECISION MEMORANDUM

OFFICE OF WATER

SUBJECT: Final Extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles for State Revolving Fund Projects

FROM: David P. Ross
Assistant Administrator

A handwritten signature in blue ink, appearing to read "D. Ross", is placed next to the name "David P. Ross".

The U.S. Environmental Protection Agency (EPA) hereby grants an extension of the Short-Term National Product Waiver for Stainless Steel Nuts and Bolts used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles for State Revolving Fund Projects, pursuant to the "American Iron and Steel" (AIS) requirements of the Clean Water Act. The original waiver was signed on February 18, 2015, and was granted a one-year extension on February 22, 2016. A second extension was granted until February 18, 2018. With this third and final extension, the waiver will retroactively cover nuts and bolts purchased since February 18, 2018, and be extended 18 months from the signing date of this waiver (sunset date). This waiver will not be renewed after the sunset date. This waiver permits the purchase and use of non-domestically produced stainless steel nuts and bolts in bolting-type pipe couplings, restraints, joints, and repair saddles in iron and steel products for projects funded by a Clean Water State Revolving Fund (CWSRF) or Drinking Water State Revolving Fund (DWSRF) that may otherwise be prohibited absent this waiver.

The original, approved waiver provides details regarding the specific types of products covered by and the rationale for issuance of the waiver (see: <https://www.epa.gov/sites/production/files/2015-09/documents/short-term-natl-waiver-for-ss-nuts-bolts-021815.pdf>). This national product waiver extension is short-term, applying to the covered products if those products are purchased by the assistance recipient or their representatives (i.e. construction contractor) up until the sunset date.

The EPA is granting this national product waiver extension on a short-term basis in order to provide the time U.S. manufacturers need to increase the domestic production of the specified stainless steel nuts and bolts. Upon the production of these parts, the EPA stands ready to provide assistance to states and others to help identify AIS compliant products consistent with the April 2017 Buy American and Hire American Executive Order.

Attachments:

1. Rationale and Legal Authority
2. Summary of Comments Received During 15-Day Informal Public Input Period on Short-Term Waiver Extension for Stainless-Steel Nuts and Bolts used in Pipe Couplings, Restraints, Joints, Flanges, and Saddles for State Revolving Fund (SRF) Projects

Attachment 6 – EPA Waiver Request

1. Information Checklist for Waiver Request

The purpose of this checklist is to help ensure that all appropriate and necessary information is submitted to EPA. EPA recommends that States review this checklist carefully and provide all appropriate information to EPA. This checklist is for informational purposes only and does not need to be included as part of a waiver application.

Items	<input type="checkbox"/>	Notes
General <ul style="list-style-type: none"> • Waiver request includes the following information: <ul style="list-style-type: none"> ○ Description of the foreign and domestic construction materials ○ Unit of measure ○ Quantity ○ Price ○ Time of delivery or availability ○ Location of the construction project ○ Name and address of the proposed supplier ○ A detailed justification for the use of foreign construction materials • Waiver request was submitted according to the instructions in the memorandum • Assistance Applicant made a good faith effort to solicit bids for domestic iron and steel products, as demonstrated by language in requests for proposals, contracts, and communications with the prime contractor 		
Cost Waiver Requests <ul style="list-style-type: none"> • Waiver request includes the following information: <ul style="list-style-type: none"> ○ Comparison of overall cost of project with domestic iron and steel products to overall cost of project with foreign iron and steel products ○ Relevant excerpts from the bid documents used by the contractors to complete the comparison ○ Supporting documentation indicating that the contractor made a reasonable survey of the market, such as a description of the process for identifying suppliers and a list of contacted suppliers 		
Availability Waiver Requests <ul style="list-style-type: none"> • Waiver request includes the following supporting documentation necessary to demonstrate the availability, quantity, and/or quality of the materials for which the waiver is requested: <ul style="list-style-type: none"> ○ Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials ○ Documentation of the assistance Applicant's efforts to find available domestic sources, such as a description of the process for identifying suppliers and a list of contacted suppliers. ○ Project schedule ○ Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials • Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought <p>Has the State received other waiver requests for the materials described in this waiver request, for comparable projects?</p>		

2. EPA Checklist for Waiver Request

Instructions: To be completed by EPA. Review all waiver requests using the questions in the checklist, and mark the appropriate box as Yes, No or N/A. Marks that fall inside the shaded boxes may be grounds for denying the waiver. If none of your review markings fall into a shaded box, the waiver is eligible for approval if it indicates that one or more of the following conditions applies to the domestic product for which the waiver is sought:

1. The iron and/or steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.
2. The inclusion of iron and/or steel products produced in the United States will increase the cost of the overall project by more than 25 percent.

Review Items	Yes	No	N/A	Notes
Cost of Waiver Request <ul style="list-style-type: none"> • Does the waiver request include the following information? <ul style="list-style-type: none"> ○ Comparison of overall cost of project with domestic iron and steel products to overall cost of project with foreign iron and steel products 				
<ul style="list-style-type: none"> ○ Relevant excerpts from the bid documents used by the contractors to complete the comparison 				
<ul style="list-style-type: none"> ○ A sufficient number of bid documents or pricing information from domestic sources to constitute a reasonable survey of the market 				
<ul style="list-style-type: none"> • Does the Total Domestic Project exceed the Total Foreign Project Cost by more than 25%? 				
Availability Waiver Requests <ul style="list-style-type: none"> • Does the waiver request include supporting documentation sufficient to show the availability, quantity, and/or quality of the iron and/or steel product for which the waiver is requested? <ul style="list-style-type: none"> ○ Supplier information or other documentation indicating availability/delivery date for materials ○ Project schedule ○ Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of materials • Does supporting documentation provide sufficient evidence that the 				
<ul style="list-style-type: none"> • Contractors made a reasonable effort to locate domestic suppliers of materials, such as a description of the process for identifying suppliers and a list of contacted suppliers? 				
<ul style="list-style-type: none"> • Based on the materials delivery/availability date indicated in the supporting documentation, will the materials be unavailable when they are needed according to the project schedule? (By item, list schedule date and domestic delivery quote date or other relevant information) 				

<ul style="list-style-type: none">• Is EPA aware of any other evidence indicating the non-availability of the materials for which the waiver is requested? Examples include:<ul style="list-style-type: none">o Multiple waiver requests for the materials described in this waiver request, for comparable projects in the same Stateo Multiple waiver requests for the materials described in this waiver request, for comparable projects in other Stateso Correspondence with construction trade associations indicating the non-availability of the materials• Are the available domestic materials indicated in the bid documents of inadequate quality compared those required by the project plans, specifications, and/or permits?				
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Attachment 7 – Construction Contract Language

The following language must be included in all construction and purchase contracts associated with a TWDB CWSRF or DWSRF loan:

The Contractor acknowledges to and for the benefit of the **Owner** (“Purchaser”) that it understands the goods and services under this Agreement are being funded with monies made available by the Clean Water State Revolving Fund or Drinking Water State Revolving Fund that have statutory requirements commonly known as “American Iron and Steel,” that requires all of the iron and steel products used in the project to be produced in the United States (“American Iron and Steel Requirement”) including iron and steel products provided by the Contractor pursuant to this Agreement. The Contractor hereby represents and warrants to and for the benefit of the Purchaser that (a) the Contractor has reviewed and understands the American Iron and Steel Requirement, (b) all of the iron and steel products used in the project will be and/or have been produced in the United States in a manner that complies with the American Iron and Steel Requirement, unless a waiver of the requirement is approved, and (c) the Contractor will provide any further verified information, certification or assurance of compliance with this paragraph, or information necessary to support a waiver of the American Iron and Steel Requirement, as may be requested by the Purchaser.

Notwithstanding any other provision of this Agreement, any failure to comply with this paragraph by the Contractor shall permit the Purchaser to enforce this Agreement and recover as damages against the Contractor any loss, expense, or cost (including without limitation attorney’s fees) incurred by the Purchaser resulting from any such failure (including without limitation any impairment or loss of funding, whether in whole or in part, from the TWDB, or any damages owed to the Purchaser).

NOTE: It is required that the Owner receive and maintain files documenting the Contractor’s use of AIS. Monthly compliance with AIS must be verified by the Owner through the submittal of the TWDB form TWDB-1106-A.

Attachment 8 – Sample Certifications

AIS Certification must document the location of the manufacturing process involved with the production of steel and iron materials. Each handler (supplier, fabricator, manufacturer, processor, etc.) of the iron and steel products and their step in the process must be recorded and certified as domestically performed.

The applicant may utilize either

- 1) a Final Manufacturer Certification process, in which the final manufacturer that delivers the iron or steel product to the worksite, vendor, or contractor, may provide a certification identifying all handlers of the iron or steel product, and asserting that all manufacturing processes occurred in the US; or
- 2) a Step Certification process in which each handler of the iron or steel product provides a separate certification letter certifying that their step in the process was domestically performed.

1. Final Manufacturer Certification – Version 1 – AIS Products Delivered to Project Site

The following information is provided as a sample letter of certification for AIS compliance. Documentation must be provided on company letterhead. The Final Manufacturer's Certification should list everyone who has handled the product, starting with the processor of the raw iron or steel through the contractor who installs the final product.

Date

Company Name

Company Address

City, State Zip

Subject: American Iron and Steel Certification for Project (XXXXXX)

I, (company representative), certify that the following products and/or materials shipped/provided to the project site below are in full compliance with the American Iron and Steel requirement as mandated in EPA's State Revolving Fund Programs.

Project Site location (City, State): _____

Project's Prime Contractor Name: _____

List for all Items, Products and/or Materials (Include all the predecessor manufacturing processes before the final manufacturer for each item on the list):

Item 1: _____

Predecessor Manufacturing Process: _____

Manufacturer's Name: _____

Manufacturing location (City, State): _____

Predecessor Manufacturing Process: _____

Manufacturer's Name: _____

Manufacturing location (City, State): _____

Item 2: _____

Predecessor Manufacturing Process: _____

Manufacturer's Name: _____

Manufacturing location (City, State): _____

Predecessor Manufacturing Process: _____

Manufacturer's Name: _____

Manufacturing location (City, State): _____

If any of the above compliance statements change while providing material to this project we will immediately notify the prime contractor and the project engineer.

Signed by company representative

2. Final Manufacturer Certification – Version 2 – AIS Products Purchased from Supplier

The Final Manufacturer's Certification should list everyone who has handled the product, starting with the processor of the raw iron or steel through to the Supplier.

Date

Company Name
Company Address
City, State Zip

Subject: American Iron and Steel Certification for Project (XXXXXX)

I, (company representative), certify that the following products and/or materials shipped/provided to the Supplier listed below are in full compliance with the American Iron and Steel requirement as mandated in EPA's State Revolving Fund Programs.

Supplier: _____
Address: _____

List for all Items, Products and/or Materials (Include all the predecessor manufacturing processes before the final manufacturer for each item on the list):

Item 1: _____
Predecessor Manufacturing Process: _____
Manufacturer's Name: _____
Manufacturing location (City, State): _____

Predecessor Manufacturing Process: _____
Manufacturer's Name: _____
Manufacturing location (City, State): _____

Item 2: _____
Predecessor Manufacturing Process: _____
Manufacturer's Name: _____
Manufacturing location (City, State): _____

Predecessor Manufacturing Process: _____
Manufacturer's Name: _____
Manufacturing location (City, State): _____

If any of the above compliance statements change while providing material to this project we will immediately notify the Supplier.

Signed by company representative

3. Step Certification

A step certification is a process under which each handler (supplier, fabricator, manufacturer, processor, etc.) of the iron and steel products certifies that their step in the process was domestically performed. The Step Certification process requires you receive a separate letter from everyone who handles the product, starting with the processor of the raw iron or steel through the contractor who installs the final product.

4. Step Certification Letter

The following information is provided as a sample letter of step certification for AIS compliance. Documentation must be provided on company letterhead of each handler responsible for that process of the iron or steel product.

Date

Company Name
Company Address
City, State ZIP Code

Subject: American Iron and Steel Step Certification for Project (XXXXXXXXXX)

I, (company representative), certify that the (melting, bending, coating, galvanizing, cutting, etc.) process for (manufacturing or fabricating) the following products and/or materials shipped or provided for (project site _____ or to _____ company) is in full compliance with the American Iron and Steel requirement as mandated in EPA's State Revolving Fund Programs.

Item 1: _____
Manufacturing location (City, State): _____

Item 2: _____
Manufacturing location (City, State): _____

If any of the above compliance statements change while providing material to this project we will immediately notify the prime contractor and the engineer.

Signed by company representative

5. Step Certification Log

The following information is provided as a sample log to keep track of step certification for AIS compliance. The TWDB makes no claims regarding the legality of the step certification log with respect to AIS compliance.

American Iron and Steel Step Certification Log for

(Iron or Steel Product)

Contractor: _____
(Name) (Item)

Supplier: _____
(Name) (Item)

Final Manufacturer: _____
(Name) (Item) (Process)

Predecessor Manufacturer 1: _____
(Name) (Item) (Process)

Predecessor Manufacturer 2: _____
(Name) (Item) (Process)

Processor (e.g., foundry): _____
(Name) (Item) (Process)

6. De Minimis Log

The following information is provided as a sample De Minimis log for AIS compliance ([TWDB-1106-B](#)). The TWDB makes no claims regarding the legality of the De Minimis log with respect to AIS compliance.

Figure 1 - Information contained in the log example: Owner Name, Project Name, TWDB SRF Number, Contractor Name, Total Project Cost, Total Material Cost followed by data entered for each of the following categories: Item Number, Iron or Steel Product, Unit Cost, Quantity, Total Cost, Percent of Total Material Cost Less Than One Percent, Cumulative Cost, Percent of Total Material Cost Less Than Five Percent.

American Iron and Steel de minimis log								
	Owner Name:	City		Total Project Cost:	\$130,000.00			
	Project Name:	CID 01 - Project		Total Material Cost:	\$100,000.00			
	TWDB SRF No.:	####						
	Contractor Name:	Contractor						
Item No.	Iron or Steel Product	Unit Cost	Quantity	Total Cost	% Mat Cost (< 1%)	Cum Cost	% Mat Cost (< 5%)	
1	Steel Door	\$400.00	1	\$ 400.00	0.40%	\$ 400.00	0.40%	
2	Bolts	\$100.00	1	\$ 100.00	0.10%	\$ 500.00	0.50%	
3	Welding rods	\$30.00	1	\$ 30.00	0.03%	\$ 530.00	0.53%	
4								
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13								

Attachment 9 – Monthly American Iron and Steel Certificate Form 1106-A

Available on the TWDB website at:

<https://www.twdb.texas.gov/financial/instructions/doc/TWDB-1106-A.pdf>

Attachment 10 – Final American Iron and Steel Certificate Form 1106-C

Available on the TWDB website at:

<https://www.twdb.texas.gov/financial/instructions/doc/TWDB-1106-C.pdf>