



Clean Water
State Revolving Fund



LUNCH AND LEARN

AMERICAN IRON AND STEEL (AIS) REQUIREMENTS FOR STATE REVOLVING FUNDS

AIS Certification Letters

Presented by U.S. EPA

July 29, 2020



Training Logistics

- ◉ Presentation by EPA staff and Contractors including:
 - Office of Wastewater Management
 - ◉ Timothy Connor and Jessica Glenn
 - Office of Ground Water and Drinking Water
 - ◉ Jorge Medrano
 - Cadmus Group
 - ◉ Melissa Brown-Rosenblatt

- ◉ Questions will be addressed at the end of the presentation.

- ◉ Slides from today's presentation will be posted on EPA's website.

Webcast Logistics

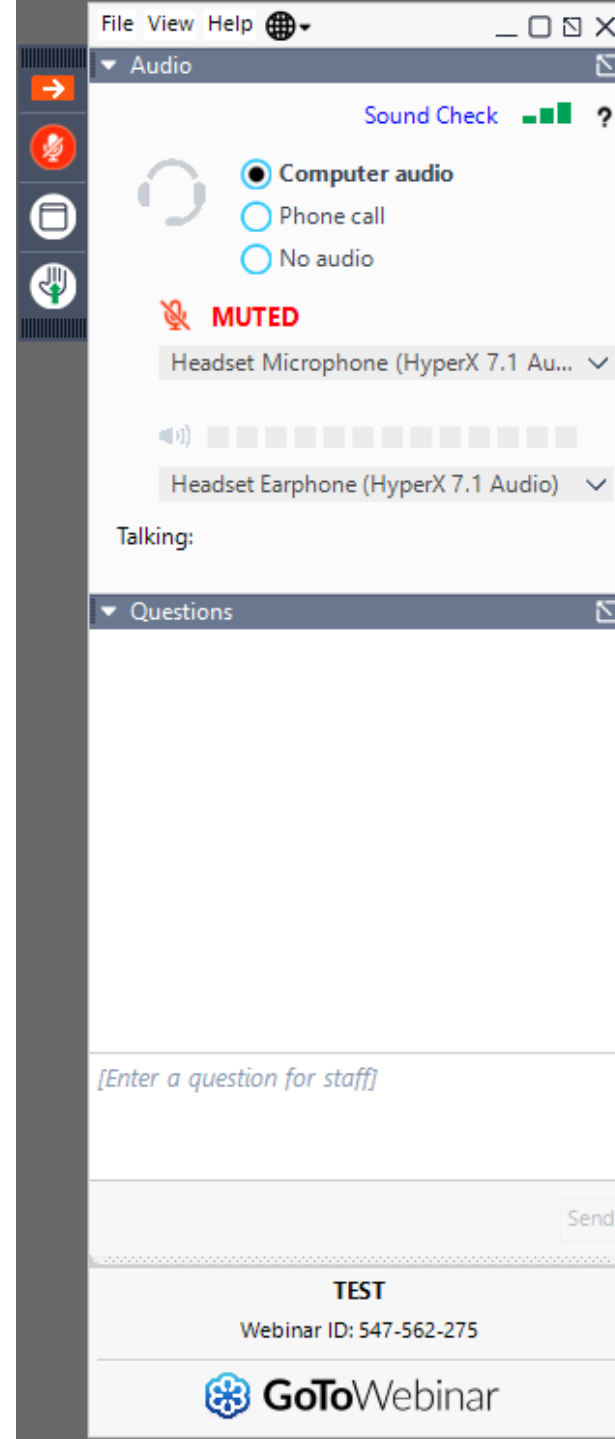
Your Participation

Join audio:

- Choose **Computer Audio** to join via computer, OR
- Choose **Telephone** and dial in using the information provided.

Submit questions and comments via the **Questions** panel.

We will answer questions at the end of today's presentation.



The screenshot shows a webcast interface with a dark sidebar on the left containing icons for navigation, audio, chat, and help. The main content area is divided into two sections: 'Audio' and 'Questions'. The 'Audio' section includes a 'Sound Check' indicator, three radio button options: 'Computer audio' (selected), 'Phone call', and 'No audio', a red 'MUTED' status with a microphone icon, and dropdown menus for 'Headset Microphone (HyperX 7.1 Au...)' and 'Headset Earphone (HyperX 7.1 Audio)'. Below the audio settings is a 'Talking:' indicator. The 'Questions' section is currently empty. At the bottom of the interface, there is a text input field with the placeholder text '[Enter a question for staff]', a 'Send' button, and a footer area containing the text 'TEST', 'Webinar ID: 547-562-275', and the 'GoToWebinar' logo.





Training Objectives

- ◉ AIS Background
- ◉ Certification Letters
 - Compliance with the AIS Requirement
 - Who is Responsible for AIS Certification Letters?
 - Key Elements of an AIS Certification Letter
 - AIS Certification Letter Examples
 - AIS Step Certification
 - Addressing Questions about Specific AIS Certification Letters
 - AIS Certification Letter Best Practices
- ◉ Answer Questions and Solicit Feedback from Community



Background – What is AIS?

- ◉ The "American Iron and Steel" provision requires SRF loan recipients to use iron and steel products that are produced in the United States for the construction, alteration, maintenance, or repair of a public water system or treatment works (Consolidated Appropriations Act of 2014 P.L. 113-76).
- ◉ The AIS requirement applies to listed products greater than 50% iron or steel by materials cost.
- ◉ As a reminder, the AIS requirement is permanent for Clean Water State Revolving Fund (SRF) projects and extended through 2023 for Drinking Water SRF projects.
- ◉ For any project that uses even one dollar of SRF money, the entire project must comply with AIS.

Background – What is an Iron and Steel Product Under the AIS Requirement?

YES Is the product a listed product?

- Products specifically listed in the Consolidated Appropriations Act, for example: lined or unlined pipes, valves, reinforced precast concrete, and structural steel.

YES Is the product primarily iron or steel?

- For a listed product to be subject to the AIS requirement, it must be made of greater than 50% iron or steel, measured by materials cost.

YES Is the product permanently incorporated in the project?

- Products that are intended to be permanently installed at the project site.

If the product meets all the criteria above YES, then it is an iron and steel product under the AIS requirement and must be produced in the United States.

Background – What is “Produced in the United States?”

- ◉ Manufacturing and processing of iron or steel must occur in the U.S., including:
 - Melting
 - Refining
 - Forming
 - Rolling
 - Drawing
 - Finishing
 - Fabricating
 - Assembly

- ◉ All processes must take place in the U.S., except:
 - Metallurgical processes involving refinement of steel additives.
 - External coating of the surface of iron/steel components.

Compliance with the AIS Requirement

1. Certification Letter

- Letter asserting that all manufacturing processes for the purchased product occurred in the U.S.
- Step Certification if there are multiple parties involved in the manufacturing processes.

2. Waiver

- EPA has authority to waive the AIS requirement and to issue waivers for a case or category of cases.
- National Waivers – Available to use at any time.
- Project-Specific Waivers – Must be applied for through your state and EPA.



Compliance with the AIS Requirement

Products less than 50% iron or steel by materials cost are not required to have an AIS Certification Letter.

- However, if the product appears to be more than 50% iron or steel by materials cost, or is a listed product, EPA recommends the assistance recipient obtain a letter stating how the product is less than 50% iron or steel by cost.
 - For example: some products contain materials such as brass that may make up a larger portion of the materials cost.



Who is Responsible for AIS Certification?

- ⦿ **Product manufacturer:** Provides the AIS certification letter for each AIS-compliant product.
- ⦿ **Supplier:** May collect and provide AIS certification letters for products that they sell to customers.
- ⦿ **Assistance recipient or their representative:** Maintains documentation for all iron and steel products that require AIS certification and are used on the SRF-funded project.

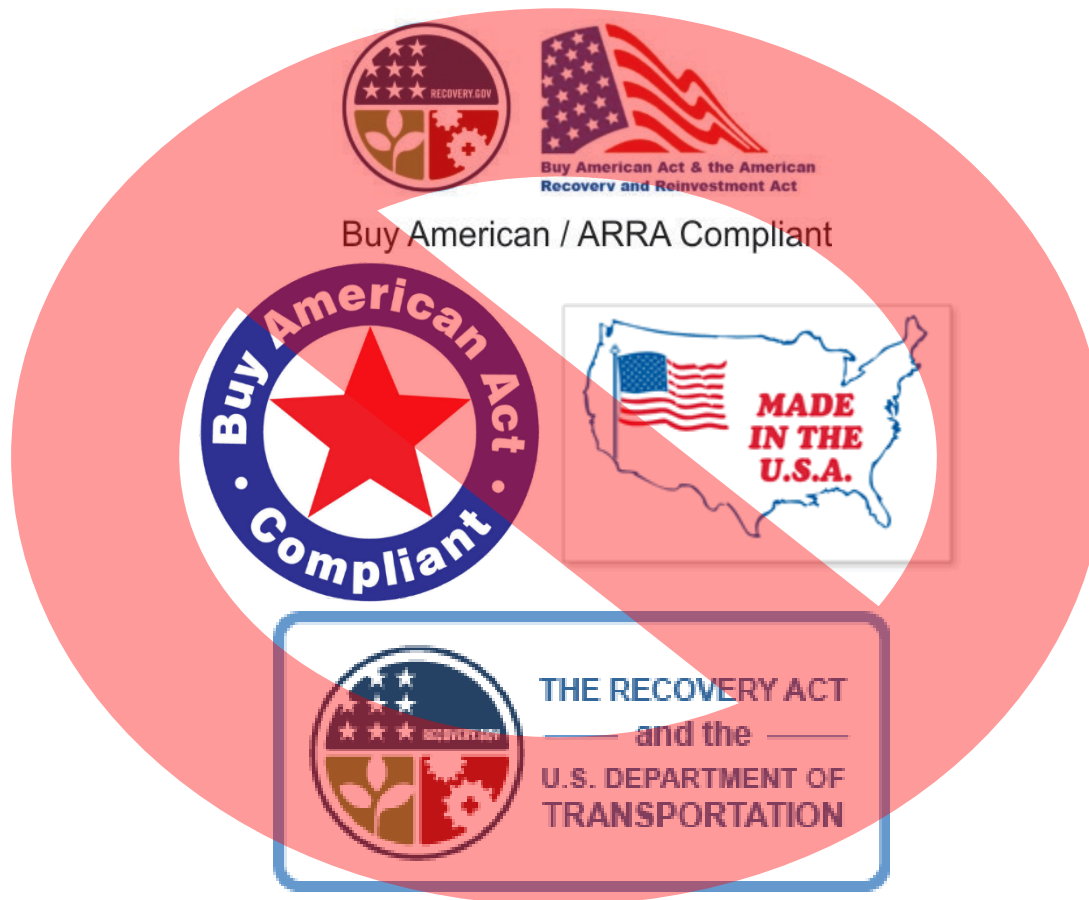


AIS Certification Letter – Key Elements

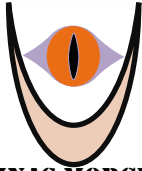
- ✓ Specific product(s) delivered to the project site.
- ✓ Location(s) of the foundry/mill/factory where the product was manufactured (City and State).
- ✓ Name of the project and/or jurisdiction to which the product was delivered.
- ✓ Signature of company representative.
- ✓ Reference AIS requirements.

AIS Certification Letter – Key Elements

A certification letter may list other requirements such as ‘Buy American’, but it is important that the letter specifically reference EPA’s AIS Requirement.



AIS Certification Letter Examples



MINAS MORGUL

Minas Morgul Steel, Inc.
1245 Barad Dur Ave.
Mordor, Middle Earth
+1 555 867 5309

Material Certification

August 29, 2017
Gondor Supply Co.
3477 One Ring Ln.
Fort Tirth, IA 50501

RE: Job Name: Saruman Contracting
Project#: Hobbiton Water Treatment Plant, The Shire, WY
Order Type: Submittal

<u>QUANTITY</u>	<u>DESCRIPTION</u>
30	8550350 66-S VLV BOX 26T 30B 1.5 WTR

Dear Valued Partner:

We hereby certify that the iron used to make the construction castings manufactured by MMS for the above referenced project is in full compliance with ASTM A48, Class 35B and AASHTO M105 for gray iron castings and ASTM A536, Grade 70-50-05 for ductile iron castings. Thank you for specifying and using products manufactured by Minas Morgul Steel, Inc.

The above listed castings are melted and manufactured 100% in the United States of America at our foundries in Moria, OK and Isengard, MI. These castings comply with the applicable provisions of the Code of Federal Regulations 23 CFR 635.410 BUY AMERICA Requirements.

We also certify that the above listed products supplied to the subject project are in full compliance with the American Iron and Steel (AIS) requirement as mandated in EPA's State Revolving Fund Programs.

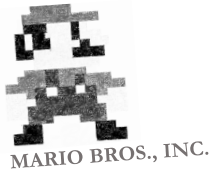
Meriadoc Brandybuck

Product Quality Manager
Minas Morgul Steel, Inc.

AIS elements:

- ✓ Project reference
- ✓ Specific list of products
- ✓ Location of manufacturing (city and state)
- ✓ Signature of a company representative
- ✓ AIS reference

AIS Certification Letter Examples



Water and Industrial

311 and 313 Ductile Iron Service Saddle

Product Specifications

TaperSeal Gasket:
Nitrile (Buna-N), NSF 61 listed, compounded to resist natural gas, water, oil, acids, alkalies, most (aliphatic) hydrocarbon fluids and many chemicals.
Temperature Range: -20°F to +180°F.

Body:
Ductile iron per ASTM A536.

Finish:
Fusion bonded Flexi-Coat epoxy.

Nuts:
Cold formed, semi-finished, heavy hex steel A563, electro-galvanized with di-chromate seal per ASTM B633.

Washers:
Carbon steel per ASTM A108, electro-galvanized with di-chromate seal per ASTM B633.

Option: Bales, nuts and washers 304 Stainless Steel. Nuts fluoropolymer coated.

Bales:
Carbon steel per ASTM A108 (C1018), electro-galvanized with di-chromate seal per ASTM B633.

Features:

- Certified to NSF/ANSI 61-G.
- Meets applicable AWWA C800 Standards.
- The wide saddle body provides stability on the pipe.
- The gasket is fully cemented in a cavity to hold it in place.
- NPT, AWWA and other threaded outlets available in sizes 5/8" thru 4".
- The gasket's TaperSeal hydro-mechanical lip enables the saddle to hold high pressures with just a few pounds of torque.
- At recommended torque, the saddle will exceed the working pressure of most standard pipes.
- A closed lug on one side, combined with the bale or strap, acts as a hinge for easier installation.
- Provides maximum support of the pipe for better performance in the tapped area - nearly 360°.

MARIO BROS., INC.

APPROVED	APPROVED AS NOTED	RETURNED FOR CORRECTIONS	NOT ACCEPTABLE
X			
DATE: 4/13/15			

AIS elements:

- Project reference
- Specific list of products
- Location of manufacturing (city and state)
- Signature of a company representative
- AIS reference

Saddle Number	Size	Working Pressure
311	1" - 12" Nominal	Up to 300 PSI
313	1 1/4" - 18" Nominal	Up to 300 PSI



AIS Step Certification

- If a product has multiple manufacturers an AIS Step Certification letter allows each handler to certify their individual process occurred in the U.S.
 - Step certification letters may be seen in products such as precast concrete or rebar utilized as part of a product.
- A Step Certification traces all steps of AIS product manufacturing to the appropriate manufacturer. All manufacturing processes must take place in the U.S.
 - The only exceptions are metallurgical processes involving refinement of steel additives, and external coating of iron/steel components.
- The AIS Step Certification letters should be kept by the assistance recipient and may be reviewed by the state during project reviews.
 - AIS step certification letters should list the manufacturing steps completed by the manufacturer as well as the same five key elements common to all AIS certification letters.

AIS Step Certification

Alden Rebar



77 Baker Street
Pilgrimsport, MA

July 29, 2020

Subject: AIS Step Certification – 2.0 MG Water Storage Tank, Mayflower, MA
Alden Rebar Job No. 12345

To Whom it May Concern:

I, John Alden, to the best of my knowledge, certify that the rolling, bending, and fabrication process for the following products and/or materials provided for the above referenced project are in full compliance with the American Iron and Steel requirement as mandated in EPA's State Revolving Fund Programs.

Item, Products and/or Materials:

1. Reinforcing Steel

Such processes took place at the following locations:

1. Pilgrimsport, MA

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

Sincerely,

John Alden

John Alden

Alden Rebar Contracts and Sales Manager

AIS elements:

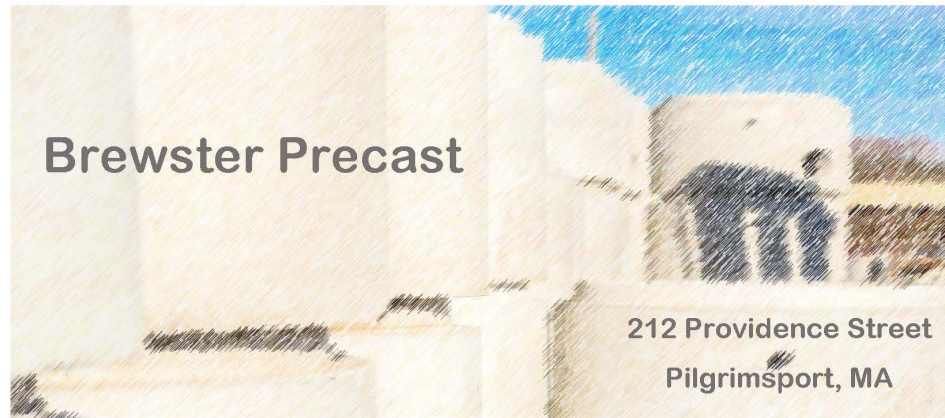
- ✓ Project reference
- ✓ AIS reference
- ✓ Specific list of products
- ✓ Location of manufacturing (city and state)
- ✓ Signature of a company representative

Step certification elements:

- ✓ Processes completed by this manufacturer



AIS Step Certification



July 29, 2020

Subject: AIS Step Certification - Tank Replacement, Mayflower, MA

To Whom it May Concern:

I, William Brewster, to the best of my knowledge, certify that our products for the following products and/or materials provided for the above referenced project are in full compliance with the American Iron and Steel requirement as mandated in EPA's State Revolving Fund Programs.

Item, Products and/or Materials:

1. Drainage Manholes
2. Utility Vaults

Such processes took place at the following locations:

1. Pilgrimsport, MA

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

Sincerely,

William Brewster

William Brewster
Brewster Precast Vice President

AIS elements:

- ✓ Project reference
- ✓ AIS reference
- ✓ Specific list of products
- ✓ Location of manufacturing (city and state)
- ✓ Signature of a company representative

Step certification elements:

- ✓ Processes completed by this manufacturer



Addressing Questions about Specific AIS Certification Letters

Does this Certification Letter Meet the AIS requirements?

- The EPA AIS Team is available to help review and provide feedback on certification letters.
- Submit an email to us at: SRF_AIS@epa.gov
Subject line '*Cert Letter Review*'



AIS Certification Letter Best Practices

- ◉ Ensure AIS language is in construction contracts.
 - Highlight that AIS compliance is required, and which products are required to comply.
 - Indicate that certification letters are required to document compliance.
- ◉ Obtain necessary AIS certifications from product manufacturers as early as possible in the construction process.
 - This can help to avoid delays in addressing questions on products that do not meet project specifications.
 - A final AIS certification letter should be requested from the manufacturer if only a provisional letter has been provided.
- ◉ Maintain proper AIS documentation.



Summary

◉ What is an AIS certification letter?

- A letter asserting that all manufacturing processes for the purchased products occurred in the U.S.
- Step certification certifies the individual steps in the manufacturing process of a product.

◉ Which Products Require an AIS Certification Letter?

- Listed products in the 2014 Consolidated Appropriations Act.
- Primarily iron or steel (50% by materials cost).
- Permanently incorporated into the project.

Summary

- ◉ Who is Responsible for AIS Certification Letters?
 - Product Manufacturer: Provide AIS certification letter for their products.
 - Product Supplier: Collect and provide AIS certification letters to customers.
 - Assistance Recipient: Maintains documentation for relevant products.

- ◉ What are the Key Elements of an AIS Certification Letter?
 - List of Specific Products Supplied
 - Manufacturing location (city, state)
 - Name of Project
 - Signature of company representative
 - Reference to EPA's AIS Requirement



Where can I find EPA AIS Resources?

- ◉ EPA's AIS team can be reached at SRF_AIS@epa.gov.
- ◉ Website: <http://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement> (or search "SRF AIS")
- ◉ Website Contents
 - Guidance: March 2014 Implementation Memorandum and subsequent Question & Answer documents to assist SRF recipients in complying with AIS requirements
 - Training Materials
 - Waivers: Information about project-specific and national waivers, and the waiver process