



## OFFICE OF WASTEWATER MANAGEMENT

WASHINGTON, D.C. 20460

### **DECISION MEMORANDUM**

**SUBJECT:** Project-Specific Availability Waiver of American Iron and Steel Requirements to San Francisco Public Utilities Commission, California for PFTE-Lined Braided Metal Hose

**FROM:** Andrew Sawyers, Director

Decision: The U.S. Environmental Protection Agency is hereby granting a project waiver pursuant to the “American Iron and Steel” (AIS) requirements of the Clean Water Act Section 608 under the authority of Section 608(c)(2) to the San Francisco Public Utilities Commission (Applicant) for PFTE-lined braided metal hose. This waiver permits the use of this hose, manufactured outside of the United States, in the Biosolids Digester Facilities project, because no domestic manufacturers produce alternatives that meet the technical specifications of the project.

This waiver applies only to the proposed project funded by the Clean Water State Revolving Fund (CWSRF). Any other jurisdiction with projects funded by either the CWSRF, the Drinking Water State Revolving Fund, or the Water Infrastructure Finance and Innovation Act that wishes to use the same product must apply for a separate waiver.

Rationale: Section 608 of the Clean Water Act requires CWSRF assistance recipients for treatment works projects to use specific iron and steel products that are produced in the United States. The EPA has the authority to determine whether it is necessary to waive this requirement based on certain circumstances set forth in Section 608(c) of the Clean Water Act. The provision states that, “[the requirements] shall not apply in any case or category of cases in which the Administrator [of the EPA] finds that – . . . (2) iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.”

Background of Waiver Request: The Applicant provided information to the EPA asserting that there are no domestic manufacturers producing PFTE-lined braided metal hose in sufficient and reasonably available quantities and of a satisfactory quality. The purpose of the project is to replace and relocate outdated solids treatment facilities with more reliable and efficient modern technologies. The new facility will produce higher quality biosolids, capture odors more effectively and maximize energy recovery for heat, steam and energy production. Part of the project includes installation of a new ferric chloride piping system. The PFTE-lined braided metal hose that will be used in this piping system must be 1-inch smooth bore with stainless steel wire

reinforcing.

Assessment of Waiver Request: The EPA conducted market research and a public comment period on the supply and availability of PFTE-lined braided metal hose. The basis of evaluation included thorough review of the waiver request submission, examination of domestic manufacturer catalogs or other technical data and marketing materials, personal communication with domestic manufacturers, inquiries of state staff, and outreach to contractors and engineers with expertise and familiarity with the project. During market research, the EPA contacted fourteen (14) manufacturers and suppliers of PFTE-lined braided metal hose. One (1) of the manufacturers initially stated they could make the AIS-compliant PFTE-lined braided metal hose. Upon further communication between the Applicant and manufacturer in June 2025, the manufacturer was unable to provide a product that meets the technical specifications of the project. The EPA received no (zero) public comments to the waiver request.

Finding: Since the Applicant established a reasonable basis to specify the products required for this project, and because the EPA substantiated the Applicant's claim through market research that these products are not available from a manufacturer in the United States, San Francisco Public Utilities Commission is hereby granted a waiver from the AIS requirements. This waiver permits the use of PFTE-lined braided metal hose, as documented in the State of California's waiver request submittal on behalf of the Applicant dated March 28, 2025.

If you have any questions concerning the contents of this memorandum, please contact [CWSRFWaiver@epa.gov](mailto:CWSRFWaiver@epa.gov).