



OFFICE OF WASTEWATER MANAGEMENT

WASHINGTON, D.C. 20460

DECISION MEMORANDUM

SUBJECT: Project-Specific Availability Waiver of American Iron and Steel Requirements to the City of Ames, Iowa for 2-Inch and Smaller Stainless Steel Socket Weld and Threaded Fittings

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 City of Ames, Iowa (Applicant) for 2-inch and smaller stainless steel socket weld and threaded fittings. This waiver permits the use of these socket weld and threaded fittings, manufactured outside of the United States, in the City of Ames, Iowa Water Pollution Control Facility 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 products 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 2-inch and smaller stainless steel socket weld and threaded fittings in sufficient and reasonably available quantities and of a

satisfactory quality. The Applicant is undertaking a comprehensive facility upgrade focused on nutrient reduction through the construction of multiple activated sludge basins, sidestream anaerobic zones, enhanced aeration and pumping systems, solids handling improvements, and supporting infrastructure including electrical and sludge thickening facilities. Seamless stainless steel, class 150, socket weld fittings are associated with the work for the condensate blowoff, sample sink, shutoff valve, and other components located in and around the activated sludge system and sludge pumping system.

Assessment of Waiver Request: The EPA conducted market research and a public comment period on the supply and availability of these 2-inch and smaller stainless steel socket weld and threaded fittings. 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 fifteen (15) manufacturers and suppliers of these 2-inch and smaller stainless steel socket weld and threaded fittings. Five (5) of the manufacturers initially stated they could make the AIS-compliant 2-inch and smaller stainless steel socket weld and threaded fittings. Upon further communications between the Applicant and manufacturers in October and November 2025, the manufacturers showed they are unable to supply an AIS compliant 2-inch and smaller stainless steel socket weld and threaded fittings meeting 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, the City of Ames, Iowa is hereby granted a waiver from the AIS requirements. This waiver permits the use of 2-inch and smaller stainless steel socket weld and threaded fittings, as documented in the State of Iowa's waiver request submittal on behalf of the Applicant dated August 5, 2025.

If you have any questions concerning the contents of this memorandum, please contact the American Iron and Steel inbox, at SRF_AIS@epa.gov.