



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 Cedar Rapids, Iowa for 1¼-Inch Condensate Valves and 4-Inch Steam Valves

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 Cedar Rapids, Iowa (Applicant) for 1¼-inch condensate and 4-inch steam valves. This waiver permits the use of these valves, manufactured outside of the United States, in the Cedar Rapids Water Pollution Control Facility Solids Processing Improvements Contract 2 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 through the CWSRF, the Drinking Water State Revolving Fund, the Community Grants Program, 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 1¼-inch condensate valves and 4-inch steam valves in sufficient and reasonably available quantities and of a satisfactory quality.

The Applicant will use the condensate and steam valves in the Cedar Rapids Water Pollution Control Facility Solids Processing Improvements Contract 2 project. The purpose of the project is to replace aging infrastructure, reduce effluent nutrient loading, avoid major failures, provide treatment capacity for existing and future industrial growth, incorporate energy efficiency and resource recovery for long-term sustainability, and reliably dispose of solids while recovering resources. The 1¼-inch condensate valves must be carbon steel, have a working pressure of 450 PSI and temperature rating of 400 degrees F, and valve design and construction per ASME B16.34. The 4-inch steam valves must be carbon steel, have a working pressure of 450 PSI and temperature rating of 400 degrees F, and valve design and construction per ASME B16.34.

Assessment of Waiver Request: The EPA conducted market research and a public comment period on the supply and availability of the condensate and steam valves. 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 ten (10) manufacturers and suppliers of condensate valves. None (zero) of the manufacturers stated they could make AIS-compliant condensate valves. During market research, the EPA also contacted eleven (11) manufacturers and suppliers of steam valves. None (zero) of the manufacturers stated they could make AIS-compliant steam valves.

The EPA received three (3) public comments on this waiver request from valve manufacturers, two (2) of which confirmed that they did not manufacture these AIS-compliant condensate and/or steam valves. The third commenter initially indicated they could provide a product responsive to the project specifications. Upon further communication between the Applicant and manufacturer in May 2026, the manufacturer determined that the offered product was not AIS compliant.

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 Cedar Rapids is hereby granted a waiver from the AIS requirements. This waiver permits the use of 1¼-inch condensate valves and 4-inch steam valves, as documented in the State of Iowa's waiver request submittal on behalf of the Applicant dated April 3, 2026.

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