



CITY OF REEDSBURG
134 South Locust Street, PO Box 490
Reedsburg, WI 53959
PH. 608-524-6404 FAX. 608-524-8458
www.reedsburgwi.gov

August 26, 2026

U.S. Environmental Protection Agency
Clean Water State Revolving Fund
Office of Wastewater Management

NOTE: Information in this waiver may have been redacted or removed due to issues of proprietary business information or incompatibility with Federal accessibility requirements. To request the information redacted for purposes of accessibility requirements, please email CWSRFWaiver@epa.gov.

RE: Public Interest Waiver Request – American Iron and Steel (AIS) Requirements
Project: 2024 Wastewater Improvements Contract A: Reedsburg WWTF
Project No.: 4139-11
Project Location: Reedsburg, Wisconsin

Dear AIS Waiver Review Team:

The City of Reedsburg respectfully submits this request for a public interest waiver from the applicable American Iron and Steel (AIS) requirements for certain roofing materials incorporated into the above-referenced project. The City understands that submission of this request does not guarantee that a waiver will be granted and that EPA will make the final determination regarding whether a waiver is appropriate.

Project Materials Cost and Supplier Information

[REDACTED] supplied six pre-engineered metal buildings (PEMBs) for the project. The PEMB materials include columns, rafters, cold-formed secondary members, cladding, structural and miscellaneous accessories, and fasteners.

Four of the six PEMBs contain the non-compliant material identified in this request, consisting of approximately 57,300 pounds of galvalume roof panels. The panels were manufactured in the United States from galvalume coils produced in the United States; however, some of those coils were produced from imported slab and therefore do not satisfy the applicable AIS requirements.

The materials were supplied between November 2024 and August 2025. The total cost of the six PEMBs [REDACTED] with the four PEMBs containing the non-compliant material having a total cost of [REDACTED]. The identified cost of the non-compliant material is [REDACTED].

The supplier of the materials is:

[REDACTED]

Circumstances and Good-Faith Compliance

The non-compliant material was provided as a result of an inadvertent supplier error. Prior to and during procurement and installation, the City received an AIS certification from [REDACTED] representing that the materials supplied for the project complied with the



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applicable AIS requirements. The City relied upon this certification and the supplier's representations when proceeding with procurement and installation.

After the materials had been installed, [REDACTED] retracted its AIS certification and notified the project team that some of the galvalume roof panels did not comply with the applicable AIS requirements. The City therefore did not knowingly procure or install non-compliant materials and had no reason to believe the materials were non-compliant when they were procured and installed.

The City has made a good-faith effort to comply with the AIS requirements and did not knowingly select or procure foreign construction materials for the purpose of circumventing those requirements. As an additional effort to address the issue, the Contractor has offered to remove the cost of the non-compliant material from the contract through a change order. This would result in the identified [REDACTED] cost of the non-compliant material being removed from the contract value.

Public Interest Justification

The City believes that requiring removal and replacement of the installed roofing materials would not be in the public interest. Removal of the existing roofing would require significant retrofit work rather than installation of a new, fully integrated roofing system. This work could disturb completed structural and building components, cause undue harm to the structures, and introduce unforeseen conditions or damage.

Removal and replacement could also affect the project schedule and potentially delay the anticipated facility startup next spring. Opening or otherwise exposing the structures during the roofing replacement process could create additional risks to materials and equipment currently stored or protected within the buildings.

Considering the circumstances, including the City's reliance on the supplier's AIS certification, the inadvertent nature of the non-compliance, the fact that the roofing panels were manufactured in the United States, the Contractor's offer to remove the cost of the non-compliant material from the contract, and the potential impacts associated with removal and replacement, the City believes that allowing the existing roofing materials to remain in place is in the public interest.

Request for Waiver

Based on the circumstances described above, the City of Reedsburg respectfully requests that EPA grant a public interest waiver for the approximately 57,300 pounds of non-compliant galvalume roof panels incorporated into four of the six PEMBs supplied by [REDACTED]

The City appreciates EPA's consideration of this request. Please contact Maximilian Buckner, City Administrator, or Steve Zibell, City Engineer at 608-524-6404 or mbuckner@reedsburgwi.gov and szibell@reedsburgwi.gov if additional information is required.



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Sincerely:

CITY OF REEDSBURG

By: 

Maximilian Buckner
City Administrator

