

# Guide to Federal Requirements for Recycle-funds SRF Projects

Federal capitalization grants established and continue to seed the State Revolving Fund (SRF) program, therefore any money provided to Project Sponsors through the SRF is subject to federal requirements. The EPA, as the funding agency for the SRF capitalization grants can also impose requirements on SRF loan recipients. Some requirements apply to all SRF projects, with an additional few that apply to federal (i.e. equivalency) projects as well as some that apply to Clean Water Projects.

This guide discusses the requirements of the federal authorities that apply to SRF recycle/Non-federal projects and explains the actions required of the Project Sponsor in order to obtain funding from the SRF. Forms referred to in the text below are found in Attachment A, and on the SRF forms page, <http://www.scdhec.gov/srfforms>.

Requirements that apply to all federally-designated projects include:

- ❖ Age Discrimination Act of 1975, Pub. L. 94-135
- ❖ Title VI of the Civil Rights Act of 1964, Pub. L. 88-352
- ❖ Section 13 of the Federal Water Pollution Control Act Amendments of 1972, Pub. L. 92-500 (Clean Water Act)
- ❖ Section 504 of the Rehabilitation Act of 1973, Pub. L. 93-112 (including Executive Orders 11914 and 11250)
- ❖ “American Iron and Steel” Provisions, Clean Water Act, Section 608, and the Consolidated and Further Continuing Appropriations Act, 2015, Section 424 (and as required by any subsequent continuing or annual appropriations act).
- ❖ Davis-Bacon and Related Acts, Clean Water Act, Section 513 and the Safe Drinking Water Act, Section 1450(e)

In addition to the above, **Clean Water projects** must also comply with the following:

- ❖ Cost and Effectiveness Analysis, CWA as amended 2014, Section 602(b)(13)
- ❖ Fiscal Sustainability Plan, Clean Water Act CWA as Amended 2014, Section 603(d)(1)(E)

## **NONDISCRIMINATION IN THE SRF PROGRAM**

- ❖ The Age Discrimination Act of 1975
- ❖ Title VI of the Civil Rights Act of 1964
- ❖ Section 13 of the Federal Water Pollution Control Act Amendments of 1972
- ❖ Section 504 of the Rehabilitation Act of 1973

The SRF program is bound by the civil rights laws above, which prohibit discrimination in providing services or benefits on the basis of race, color, religion, national origin, sex, handicap or age.

These laws were amended in 1988 to make clear that their anti-discrimination powers are intended to apply to the entire operations of a project sponsor, not just the specific program, project, or activity that involves federal assistance. Recipients of federal financial assistance from the US EPA must comply with the above laws.

Direct EPA grantees, such as DHEC's SRF Program, are required to complete and submit to EPA Form 4700-4: Preaward Compliance Review Report for all Applicants and Recipients Requesting Federal Financial Assistance. SRF assistance recipients do not have to submit EPA form 4700-4 to EPA or DHEC, but instead are asked to review the form to self-assess how well the entity addresses nondiscrimination in its programs. An SRF Project Sponsor needs to be compliant with nondiscrimination practices. Keeping a copy of the form with any relevant documentation in the project's documentation file would be a best practice.

## **"AMERICAN IRON AND STEEL" PROVISIONS**

- ❖ Clean Water Act, Section 608 and Consolidated and Further Continuing Appropriations Act, 2015- "Use of American Iron and Steel" (and as required by any subsequent continuing or annual appropriations act)

The American Iron and Steel (AIS) provision requires Clean Water State Revolving Fund (CWSRF) and Drinking Water State Revolving Fund (DWSRF) assistance recipients to use iron and steel products that are produced in the United States. This requirement applies to projects for the construction, alteration, maintenance, or repair of a public water system or treatment works. Project Sponsors are required to follow "American Iron and Steel" provisions and certify that all iron and steel products used in the project are produced in the United States, unless a waiver is granted by the U. S. Environmental Protection Agency.

"Iron and steel" products means the following products made primarily of iron or steel: lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restraints, valves, structural steel, reinforced precast concrete and construction materials. Additional information may be found in Guidance posted to the EPA Website, <https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement>.

Project Sponsors must require the prime contractor to follow the American Iron and Steel provisions and certify compliance using DHEC Form 2556, "Bidders 'American Iron and Steel' Certification", which must be submitted as part of the bid package.

Any direct equipment or material purchases made by the Project Sponsor must be certified as meeting American Iron and Steel requirements using DHEC Form 2558, "Project Sponsor's 'American Iron and Steel' Certification for Direct Equipment Purchase."

To certify a Sponsor's compliance with American Iron and Steel during construction, the "Project Sponsor's 'American Iron and Steel' Compliance Form," DHEC Form 0962, must accompany all draw requests.

## DAVIS-BACON AND RELATED ACTS

- ❖ Clean Water Act, Section 513 and Safe Drinking Water Act, Section 1450(e)
- ❖ Public Law 107-217- [The Davis-Bacon Act, as amended, 2002] and Related Acts – the many laws that authorize federal assistance for construction that include provisions requiring Davis-Bacon labor standards apply to most federally-assisted construction.

Wage Rate Requirements - All contracts and subcontracts for construction carried out in whole or in part with assistance made available by SC SRF shall insert in full in any contract in excess of \$2,000 the required contract clauses, which can be found in *Appendix A – Mandatory Supplemental General Conditions for the South Carolina State Revolving Program*.

Project Sponsors **must require the prime contractor(s)** to: follow the Davis-Bacon provisions; include a copy of the "wage rate requirements" and the proper Davis-Bacon wage determination(s) in all subcontracts over \$2,000; and maintain and provide all required documentation. To certify a Sponsor's compliance with Davis-Bacon and Related Acts, DHEC Form 2557, the "Project Sponsor's Davis-Bacon Certification," must accompany all draw requests.

## COST AND EFFECTIVENESS

### Clean Water Only

- ❖ Clean Water Act, Section 602(b)(13)

All Clean Water SRF loan recipients must certify that they have conducted a "cost and effectiveness analysis" of the project being funded. The cost of such analysis is an eligible SRF project cost. The cost and effective analysis should be part of the Preliminary Engineering Report.

At a minimum, the cost and effectiveness analysis must involve:

- the study and evaluation of the cost and effectiveness of the processes, materials, techniques, and technologies for carrying out the proposed project or activity for which assistance is sought under this title; and

- the selection, to the maximum extent practicable, of a project or activity that maximizes the potential for efficient water use, reuse, recapture, and conservation, and energy conservation, taking into account—
  - the cost of constructing the project or activity;
  - the cost of operating and maintaining the project or activity over the life of the project or activity; and
  - the cost of replacing the project or activity.

See “Cost and Effectiveness” guidance posted at <http://www.scdhec.gov/srfguidance> and consult with DHEC Project Managers to learn what to include in the PER document regarding cost and effectiveness.

## **FISCAL SUSTAINABILITY PLAN**

### **Clean Water Only**

- ❖ Clean Water Act, Section 603(d)(1)(E)

For Clean Water SRF projects that involve the repair, replacement, or expansion of a treatment works, the loan recipient must develop and implement, for that part of the treatment works at minimum, a fiscal sustainability plan (FSP), or, certify that one has been developed and implemented. Development of an FSP is a CWSRF eligible expense.

FSPs must include, at a minimum:

- an inventory of critical assets that are part of the treatment works;
- an evaluation of the condition and performance of inventoried assets or asset groupings;
- a certification that the assistance recipient has evaluated and will be implementing water and energy conservation efforts as part of the plan; and
- a plan for maintaining, repairing, and, as necessary, replacing the treatment works and a plan for funding such activities.

Borrowers must certify, or develop then certify, that there is an FSP meeting the above requirements before DHEC will approve the final disbursement of funds to the project sponsor. DHEC will not collect the FSP but may review the FSP during an on-site project evaluation.

Consult with DHEC Project Managers to request guidance on the FSP process and learn of any upcoming Asset Management/FSP trainings.

## **ATTACHMENT A**

### **FORMS**

EPA 4700-4	Preaward Compliance Review Report for all Applicants and Recipients Requesting Federal Financial Assistance
DHEC 0962	Project Sponsor's "American Iron and Steel" Certification
DHEC 2556	Bidders "American Iron and Steel" Certification
DHEC 2557	Project Sponsor's Davis-Bacon Certification
DHEC 2558	Project Sponsor's "American Iron and Steel" Certification for Direct Equipment Purchase



## Instructions for EPA FORM 4700-4 (Rev. 06/2014)

### General

Recipients of Federal financial assistance from the U.S. Environmental Protection Agency must comply with the following statutes and regulations.

Title VI of the Civil Rights Acts of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The Act goes on to explain that the statute shall not be construed to authorize action with respect to any employment practice of any employer, employment agency, or labor organization (except where the primary objective of the Federal financial assistance is to provide employment).

Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act provides that no person in the United States shall on the ground of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under the Federal Water Pollution Control Act, as amended. Employment discrimination on the basis of sex is prohibited in all such programs or activities.

Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability in the United States shall solely by reason of disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. Employment discrimination on the basis of disability is prohibited in all such programs or activities.

The Age Discrimination Act of 1975 provides that no person on the basis of age shall be excluded from participation under any program or activity receiving Federal financial assistance. Employment discrimination is not covered. Age discrimination in employment is prohibited by the Age Discrimination in Employment Act administered by the Equal Employment Opportunity Commission.

Title IX of the Education Amendments of 1972 provides that no person in the United States on the basis of sex shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. Employment discrimination on the basis of sex is prohibited in all such education programs or activities. Note: an education program or activity is not limited to only those conducted by a formal institution.

40 C.F.R. Part 5 implements Title IX of the Education Amendments of 1972.

40 C.F.R. Part 7 implements Title VI of the Civil Rights Act of 1964, Section 13 of the 1972 Amendments to the Federal Water Pollution Control Act, and Section 504 of The Rehabilitation Act of 1973.

The Executive Order 13166 (E.O. 13166) entitled; "Improving Access to Services for Persons with Limited English Proficiency" requires Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

### Items

"Applicant" means any entity that files an application or unsolicited proposal or otherwise requests EPA assistance. 40 C.F.R. §§ 5.105, 7.25.

"Recipient" means any entity, other than applicant, which will actually receive EPA assistance. 40 C.F.R. §§ 5.105, 7.25.

"Civil rights lawsuits and administrative complaints" means any lawsuit or administrative complaint alleging discrimination on the basis of race, color, national origin, sex, age, or disability pending or decided against the applicant and/or entity which actually benefits from the grant, but excluding employment complaints not covered by 40 C.F.R. Parts 5 and 7. For example, if a city is the named applicant but the grant will actually benefit the Department of Sewage, civil rights lawsuits involving both the city and the Department of Sewage should be listed.

"Civil rights compliance review" means any review assessing the applicant's and/or recipient's compliance with laws prohibiting discrimination on the basis of race, color, national origin, sex, age, or disability.

Submit this form with the original and required copies of applications, requests for extensions, requests for increase of funds, etc. Updates of information are all that are required after the initial application submission.

If any item is not relevant to the project for which assistance is requested, write "NA" for "Not Applicable."

In the event applicant is uncertain about how to answer any questions, EPA program officials should be contacted for clarification.

\* Note: Signature appears in the Approval Section of the EPA Comprehensive Administrative Review For Grants/Cooperative Agreements & Continuation/Supplemental Awards form.

### "Burden Disclosure Statement"

EPA estimates public reporting burden for the preparation of this form to average 30 minutes per response. This estimate includes the time for reviewing instructions, gathering and maintaining the data needed and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to U.S. EPA, Attn: Collection Strategies Division (MC 2822T), Office of Information Collection, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

The information on this form is required to enable the U.S. Environmental Protection Agency to determine whether applicants and prospective recipients are developing projects, programs and activities on a nondiscriminatory basis as required by the above statutes and regulations.



Bureau of Water – State Revolving Fund Program

**Project Sponsor’s “American Iron And Steel” Certification**

SRF Project Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Project Sponsor: \_\_\_\_\_

Period From: \_\_\_\_\_ To: \_\_\_\_\_

I certify, to the best of my knowledge and belief, that the above referenced project complies with American Iron and Steel Requirements of Section 436 of the Consolidated Appropriations Act, 2014, and that all of the iron and steel placed and/or stored during the above referenced period were produced in the United States, unless a waiver\* was granted by the U. S. Environmental Protection Agency.

I understand that a false statement on this certification may be grounds for termination of the loan agreement.

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Signature of the Project Sponsor’s Representative

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Name and Title of Project Sponsor’s Representative

*\*A copy of any waiver used by the project must be provided to DHEC SRF with the first draw after the waiver is employed on the project.*

## **INSTRUCTIONS FOR COMPLETING PROJECT SPONSOR'S "AMERICAN IRON AND STEEL" CERTIFICATION**

**PURPOSE:** The purpose of the *Project Sponsor's American Iron and Steel Certification* is to certify that, as required by Section 436 of the Consolidated Appropriations Act, 2014, all of the iron and steel products used in the referenced State Revolving Fund (SRF) project are produced in the United States unless a waiver is granted by the U. S. Environmental Protection Agency. All Sponsors of SRF projects funded after January 17, 2014 and before October 1, 2014 must complete this form, unless the project had approved plans and specs or an assistance agreement in place before January 17, 2014.

**GENERAL INFORMATION:** "Iron and steel" products means the following products made primarily of iron or steel: lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restraints, valves, structural steel, reinforced concrete and construction materials. Additional information, including any published waivers, is posted on the EPA Website, [http://water.epa.gov/grants\\_funding/aisrequirement.cfm](http://water.epa.gov/grants_funding/aisrequirement.cfm).

All firms bidding on SRF projects funded after January 17, 2014 and prior to October 1, 2014 must complete this form, unless complete plans and specifications were approved by January 17, 2014.

**INSTRUCTIONS:** The Project Sponsor's representative must complete and submit this form with each draw request.

Provide the project name, SRF project number, project sponsor name (utility, town, etc), and covered period (time covered by the draw request).

Sign the form to certify that the identified SRF project complies with the American Iron and Steel provision. Include the name and title of the Project Sponsor's representative.

**DHEC REVIEW AND FILING:** The Bureau of Water will use the above referenced form to document compliance with EPA/SRF appropriations law. The form will be kept in the Draw Request file of the project name listed on the form. Under retention schedule 15795 the *Project Sponsor's "American Iron and Steel" Certification* will be retained on file with the Bureau of Water for three years following the final disbursement to the project.



Bureau of Water – State Revolving Fund Program

**Bidder's "American Iron And Steel" Certification**

SRF Project Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Project Sponsor: \_\_\_\_\_

With respect to the "American Iron and Steel" (AIS) provisions of the Consolidated Appropriations Act, 2014 under Section 436, I understand the AIS Requirement and that this requirement applies to any and all portions of the project, including subcontracted portions; and I certify to the best of my knowledge and belief that:

1. Identification of American Iron and Steel: Consistent with the terms of the Project Sponsor's bid solicitation and the AIS provisions, the bidder certifies that this bid reflects the bidder's best, good faith effort to identify domestic sources of iron and steel for every covered product contained in the bid solicitation where such American-made components are available on the schedule and consistent with the deadlines prescribed in or required by the bid solicitation.
2. Verification of U.S. Production: The bidder certifies that all covered products contained in the bid solicitation that are American-made have been so identified, and if this bid is accepted, the bidder agrees that it will provide reasonable, sufficient, and timely verification to the Project Sponsor of the U.S. production of each component so identified.
3. Documentation Regarding Non-American Iron and Steel: The bidder certifies that for any product or products that are not American-made and are so identified in this bid, the bidder has included in or attached to this certification one or both of the following, as applicable:
  - a. Identification of and citation to a categorical waiver published by the U.S. Environmental Protection Agency in the Federal Register that is applicable to such product or products, and an analysis that supports its applicability to the product or products;
  - b. Verifiable documentation sufficient to the Project Sponsor, as required in the bid solicitation or otherwise, that the bidder has sought to secure American-made products but has determined that such products are not available on the schedule and consistent with the deadlines prescribed in the bid solicitation, with assurance adequate for the bidder under the applicable conditions stated in the bid solicitation or otherwise.
4. Information and Detailed Justification Regarding Non-American-made Iron and Steel: The bidder certifies that for any such product or products that are not so available, the bidder has also provided in or attached to this certification, including but not limited to the verifiable documentation and a full description of the bidder's efforts to secure any such American-made product or products, that the bidder believes are sufficient to provide and as far as possible constitute the detailed justification required for an AIS waiver with respect to such product or products. The bidder further agrees that, if this bid is accepted, it will assist the Project Sponsor in amending, supplementing, or further supporting such information as required by the Project Sponsor to request and, as applicable, implement the terms of a waiver with respect to any such product or products.

I understand that a false statement on this certification may be grounds for rejection or termination of any award.

\_\_\_\_\_  
Signature of Bidder

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed Name and Title of Bidder

\_\_\_\_\_  
Name of Bidder's company

\_\_\_\_\_  
Bidder's Address

\_\_\_\_\_  
Bidder's Telephone Number

**INSTRUCTIONS FOR COMPLETING  
BIDDER'S "AMERICAN IRON AND STEEL" CERTIFICATION**

**PURPOSE:** The purpose of the *Bidder's "American Iron and Steel" Certification* is to certify that, as required by Section 436 of the Consolidated Appropriations Act, 2014, all of the iron and steel products used in the referenced State Revolving Fund (SRF) project are produced in the United States unless a waiver is granted by the U.S. Environmental Protection Agency.

**GENERAL INFORMATION:** "Iron and steel" products means the following products made primarily of iron or steel: lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restraints, valves, structural steel, reinforced precise concrete and construction materials. Additional information, including any published waivers, is posted on the EPA Website, [http://water.epa.gov/grants\\_funding/aisrequirement.cfm](http://water.epa.gov/grants_funding/aisrequirement.cfm).

All firms bidding on SRF projects funded after January 17, 2014 and prior to October 1, 2014 must complete this form, unless complete plans and specifications were approved by January 17, 2014.

**INSTRUCTIONS:** Provide the project name, SRF project number, and project sponsor name (utility, town, etc).

Certify compliance with "American Iron and Steel" Provisions by signing the form. Include the date, typed name and title of the bidder, name of bidder's company, bidder's address and bidder's telephone number.

**DHEC REVIEW AND FILING:** The Bureau of Water will use the above referenced form to document bidder compliance with AIS. The form will be kept in the SRF Bidding file of the project name listed on the form. Under retention schedule 15795 the *Bidder's "American Iron and Steel" Certification* will be retained on file with the Bureau of Water for three years following project completion.



**Project Sponsor:** \_\_\_\_\_  
**Project Name:** \_\_\_\_\_  
**Project Number:** \_\_\_\_\_  
**Period From:** \_\_\_\_\_ **To:** \_\_\_\_\_

**STATE OF SOUTH CAROLINA STATE REVOLVING FUND (SRF) SECTION  
PROJECT SPONSOR'S DAVIS-BACON CERTIFICATION**

I certify, to the best of my knowledge and belief, that the above referenced project *complies* with Davis-Bacon and Related Acts, and that all laborers and mechanics employed by contractors and subcontractors during the above referenced period were paid wages at rates not less than those listed on the prevailing wage rate contained in the contract documents and that all applicable provisions of the Davis-Bacon and Related Acts have been met.

I understand that a false statement on this certification may be grounds for termination of the loan agreement.

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Signature of the Project Sponsor's Representative

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Name and Title of Project Sponsor's Representative

DHEC 2557 (11/2010)

**INSTRUCTIONS FOR COMPLETING  
PROJECT SPONSOR'S DAVIS-BACON CERTIFICATION  
DHEC FORM 2557**

The purpose of the Project Sponsor's Davis-Bacon Certification is to certify the identified SRF project complies with Davis-Bacon and Related Acts for the period identified on the form. This certification form must accompany all draw requests.

The Project Sponsor's representative must complete this form.

Please provide the name of the Project Sponsor, project name, SRF project number and covered period.

Please certify that the identified SRF project complies with Davis Bacon and Related Acts by signing the form and including the printed or typed name and title of the Project Sponsor's representative.

DHEC Review and Filing. The Bureau of Water will use the above referenced form to document compliance with EPA/SRF appropriations law. The form will be kept in the Draw Request file of the project name listed on the form. The Project Sponsor's Davis-Bacon Certification will be retained on file with the Bureau of Water for three years following the final disbursement to the project from the SC Budget and Control Board.



Bureau of Water – State Revolving Fund Program

**Project Sponsor’s “American Iron And Steel” Certification  
for Direct Equipment/Material Purchases**

SRF Project Number: \_\_\_\_\_

Project Name: \_\_\_\_\_

Project Sponsor: \_\_\_\_\_

With respect to the “American Iron and Steel” provisions of the Consolidated Appropriations Act, 2014 under Section 436, I certify to the best of my knowledge and belief that:

1. Identification of American-made Iron and Steel: Consistent with the provision of the Appropriations Act Section 436, the Project Sponsor certifies that the direct purchase of \_\_\_\_\_(identify purchased equipment or material) reflects the Project Sponsor’s best, good faith effort to identify domestic sources of iron and steel products for every product contained in the direct purchase solicitation where such American-made components are available on the schedule and consistent with the deadlines prescribed in or required by the direct purchase solicitation.
2. Verification of U. S. Production: The Project Sponsor certifies that all covered products contained in the direct purchase solicitation that are American-made have been so identified.
3. Documentation Regarding Non-American made Iron and Steel: The Project Sponsor certifies that for any product or products that are not American-made and are so identified in this direct purchase, the Project Sponsor has included in or attached to this certification one or both of the following, as applicable:
  - a. Identification of and citation to a categorical waiver published by the U. S. Environmental Protection Agency in the Federal Register that is applicable to such product or products, and an analysis that supports its applicability to the product or products;
  - b. Verifiable documentation that the Project Sponsor has sought to secure American-made components but has determined that such products are not available on the schedule and consistent with the deadlines prescribed in the direct purchase solicitation.
4. Information and Detailed Justification Regarding Non-American-made Iron and Steel: The Project Sponsor certifies that for any such product or products that are not so available, the Project Sponsor has also provided or attached to this certification information, including but not limited to the verifiable documentation and a full description of the Project Sponsor’s efforts to secure any such American-made product or products, that the Project Sponsor believes are sufficient to provide and as far as possible constitute the detailed justification required for a waiver under “American Iron and Steel” provisions with respect to such product or products. The Project Sponsor further agrees to request and, as applicable, implement the terms of a waiver with respect to any such product or products.



**INSTRUCTIONS FOR COMPLETING  
PROJECT SPONSOR'S "AMERICAN IRON AND STEEL" CERTIFICATION  
FOR DIRECT EQUIPMENT/MATERIAL PURCHASES**

**PURPOSE:** The purpose of the *Project Sponsor's "American Iron and Steel" Certification for Direct Equipment/Material Purchases* is to certify that, as required by Section 436 of the Consolidated Appropriations Act, 2014, all of the iron and steel products used in the referenced State Revolving Fund (SRF) project are produced in the United States unless a waiver is granted by the U.S. Environmental Protection Agency.

**GENERAL INFORMATION:** "Iron and steel" products means the following products made primarily of iron or steel: lined or unlined pipes and fittings, manhole covers and other municipal castings, hydrants, tanks, flanges, pipe clamps and restraints, valves, structural steel, reinforced precise concrete and construction materials. Additional information, including any published waivers, is posted on the EPA Website, [http://water.epa.gov/grants\\_funding/aisrequirement.cfm](http://water.epa.gov/grants_funding/aisrequirement.cfm).

Sponsors of an SRF projects funded after January 17, 2014 and prior to October 1, 2014 that make a direct purchase of any equipment or materials as part of the project must complete this form, unless complete plans and specifications were approved by January 17, 2014.

**INSTRUCTIONS:** Provide the project name, SRF project number, and project sponsor name (utility, town, etc).

Certify compliance with the "American Iron and Steel" Requirements by signing the form and including the date, typed name and title of the Project Sponsor's representative, name of Project Sponsor, Project Sponsor's address and Project Sponsor's telephone number.

**DHEC REVIEW AND FILING:** The Bureau of Water will use the above referenced form to document Project Sponsor's compliance with American Iron and Steel Provision for direct equipment/material purchases. The form will be kept in the SRF Procurement file of the project name listed on the form. Under retention schedule 15795 the Project Sponsor's "American Iron and Steel" Certification for Direct *Equipment/Material Purchases* will be retained in the SRF project record for three years following the final disbursement to the project.