



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

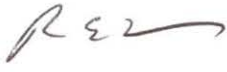
JUN 13 2016

OFFICE OF WATER

**DECISION MEMORANDUM**

**SUBJECT:** Mobile Area Water and Sewer System Waiver Request for 54-Inch Ductile Iron Flanges– Not Approved

**TO:** Stan Shirley  
Permits & Services Division  
The Alabama Department of Environmental Management

**FROM:** Raffael Stein   
Division Director  
Municipal Support Division

The Clean Water Act includes an “American Iron and Steel” requirement in section 608 that requires Clean Water State Revolving Fund assistance recipients to use iron and steel products that are produced in the United States, or otherwise obtain a waiver. Section 608 also sets forth the circumstances under which EPA may waive the AIS requirement. This memo documents EPA’s response to a waiver request for 54-inch ductile iron flanges from the state of Alabama on behalf of the Mobile Area Water and Sewer System (MAWSS).

Background: On May 12, 2016 Alabama submitted a product waiver request on behalf of MAWSS for the use of non-domestic 54-inch ductile iron flanges as part of MAWSS’s C.C. Williams WWTP Headworks and Primary Clarifier Replacement project. The project specifications require a 54-inch ductile iron flange and a 54-inch tapped ductile iron flange. The applicant was unable to identify a manufacturer that could produce the specified product domestically.

Rationale: The EPA conducted market research on the supply and availability of ductile iron flanges. The Agency found two domestic manufacturers that can produce AIS-compliant ductile iron flanges that can meet the project specifications and be delivered on time to avoid significant delays in the project schedule.

The EPA provided information about the alternate products to the applicant and the applicant confirmed that the domestic products would be suitable for the project. Therefore, we are not approving this waiver request.