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February 29, 2016

SUBJECT: American Iron and Steel provisions of P.L. 113-76

This is to certify that all carbon and stainless steel assemblies and products produced by Mazzei Injector Company, LLC are **exempt** from the "American Iron and Steel (AIS)" requirements of P.L. 113-76 Consolidated Appropriations Act, 2014.

Exemption is based on United States Environmental Protection Agency memorandum dated March 20, 2014. The memorandum specifically states,

"Mechanical and electrical components, equipment and systems are not considered construction materials. Mechanical equipment is typically that which has motorized parts and/or is powered by a motor. Electrical equipment is typically any machine powered by electricity and includes components that are part of the electrical distribution system.

"The following examples (including their appurtenances necessary for their intended use and operation) are NOT considered construction materials: pumps, motors, gear reducers, drives (including variable frequency drives (VFDs)), electric/pneumatic/manual accessories used to operate valves (such as electric valve actuators), mixers, gates, motorized screens (such as traveling screens), blowers/aeration equipment, compressors, meters, sensors, controls and switches, supervisory control and data acquisition (SCADA), membrane bioreactor systems, membrane filtration systems, filters, clarifiers and clarifier mechanisms, rakes, grinders, disinfection systems, presses (including bel presses), conveyors, cranes, HVAC (excluding ductwork), water heaters, heat exchangers, generators, cabinetry and housings (such as electrical boxes/enclosures), lighting fixtures, electrical conduit, emergency life systems, metal office furniture, shelving, laboratory equipment, analytical instrumentation, and dewatering equipment."

Justin Bennett

**Director of Engineering** 

Mazzei Injector Company, LLC