

GOVERNMENT, BUILDING & CODE REQUIREMENTS & SPECIFICATIONS

Summary Sheet as of January 2017

BUY AMERICAN ACT

Because Steelscape's products are manufactured in the United States, construction materials manufactured using Steelscape's products will comply with the Buy American provisions of the Buy American Act ("BAA"). **Steelscape's products DO qualify for all BAA projects.**

SURFACE TRANSPORTATION ASSISTANCE ACT

The Surface Transportation Assistance Act ("STAA") covers those federal funds distributed to the states by the Federal Highway Administration and the Federal Transit Administration for highway and mass transit (rail) projects.

The STAA does **NOT** cover projects related to aviation and/or ports (ship/vessel).

The Buy American provisions within the STAA are more stringent than the BAA.

Steelscape's standard products do **NOT** qualify for highway or mass transit (rail) projects but **DO** qualify for aviation and port projects.

Further, Steelscape MAY BE ABLE to purchase domestic hot band to satisfy the STAA requirements if the customer notifies us at the time of order entry.

STATE BUY AMERICAN &/or MADE IN THE USA PROVISIONS

Many states have their own Buy American or Made in the USA provisions. These requirements tend to vary significantly depending on the state and/or enforcing party.

These requirements need to be reviewed on a case-by-case basis in order to determine if Steelscape's standard products qualify or if domestically sourced hot band is required.

AMERICAN REINVESTMENT AND RECOVERY ACT

Changes to the Buy American requirements of “American Recovery and Reinvestment Act of 2009” (ARRA)

ARRA applies to construction projects that use ARRA funds. ARRA funded projects must use construction material that is manufactured in the United States.

Until August 30, 2010, the consensus interpretation of this requirement was that steel produced outside of the United States could be used for ARRA projects if the foreign steel was manufactured into construction material in the US.

On August 30, 2010 the government issued final guidelines that reversed this interpretation and the government’s earlier interim guidelines. The guidelines now make clear that construction materials manufactured in the United States predominantly or wholly from foreign steel do **NOT** conform to the restrictions imposed by the Buy American requirements under ARRA. This new ruling was effective October 1, 2010, and applied to solicitations for bids issued and contracts awarded on or after October 1st.

Based on the new ruling effective October 1st, Steelscape’s standard products do NOT qualify for purposes of ARRA funded projects.**

***This may not apply if the total project cost exceeds \$7.8 million.*

Status	Guidance
Project Completed	No issue. Steelscape standard products DO comply.
Contract awarded, but work not complete	No issue, if the project is completed before or after October 1 st , so long as the contract was awarded prior to October 1 st . Steelscape standard products DO comply.
Bid submitted, not accepted	<p>If the bid was accepted BEFORE October 1st, projects can rely on the original ARRA interpretation. Steelscape standard products DO comply.</p> <p>If the bid is accepted AFTER October 1st, projects must meet new ARRA compliance rulings. Steelscape standard products DO NOT comply. Steelscape products manufactured with domestic hot band DO comply.</p>
Bid not yet submitted	Steelscape standard products DO NOT comply. Steelscape products manufactured with domestic hot band DO comply. (This means that all steel must be procured domestically.)

Steelscape MAY BE ABLE to purchase domestic hot band to satisfy the new ARRA requirements if the customer notifies us at the time of order entry.