

# MEMORANDUM

Date: January 2026

Subject: Communicating Steel Requirements Customer Letter, Customer Service Notes

As outlined in the ‘*Communicating Steel Requirements*’ customer letter, please use specific, consistent language when outlining order material requirements. The primary terms include:

**Standard Material**

**Domestic Melted and Poured Material (also known as MPUSA)**

**High-Recycled Content Material**

**Domestic Melted and Poured AND High-Recycled Content Material**

The definitions of each are outlined in the letter. For additional guidance the following table outlines the primary project requirements influencing hot band material selection. If you are unsure which type of material is required for a specific requirement, please contact Michelle Vondran at [michelle.vondran@steelscape.com](mailto:michelle.vondran@steelscape.com).

Provision	Guidance Language	Requirement
Build America, Buy America Act (BABAA)	All iron and steel items used in the project are produced in the United States. This means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.	<b>Domestic Melted and Poured Material (also known as MPUSA)</b>
Buy American Act (BAA)	For an end-product that consists wholly or predominantly of iron or steel or a combination of both, an end-product manufactured in the United States, if the cost of foreign iron and steel constitutes <b>less than 5 percent of the cost of all the components used in the end-product</b> . The cost of foreign iron and steel includes but is not limited to the cost of foreign iron or steel mill products (such as bar, billet, slab, wire, plate, or sheet), castings, or forgings utilized in the manufacture of the end-product and a good faith estimate of the cost of all foreign iron or steel components excluding COTS fasteners.	<b>Domestic Melted and Poured Material (also known as MPUSA)</b>

Provision	Guidance Language	Requirement
Surface Transportation Assistance Act (STAA) and the subcomponent Buy America (Section 165)	<p>§313. Buy America</p> <p>(a) Notwithstanding any other provision of law, the Secretary of Transportation shall not obligate any funds authorized to be appropriated to carry out the Surface Transportation Assistance Act of 1982 (96 Stat. 2097) or this title and administered by the Department of Transportation, unless steel, iron, and manufactured products used in such project are produced in the United States.</p> <p>(b) The provisions of subsection (a) of this section shall not apply where the Secretary finds-</p> <p>(1) that their application would be inconsistent with the public interest;</p> <p>(2) that such materials and products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality; or</p> <p>(3) that inclusion of domestic material will increase the cost of the overall project contract by more than 25 percent.</p>	<b>Domestic Melted and Poured Material (also known as MPUSA)</b>
American Recovery and Reinvestment Act (ARRA) 2009 <i>Funding mostly exhausted</i>	<p>The American Recovery and Reinvestment Act (ARRA) of 2009 requires that all iron, steel, and manufactured goods used in construction projects funded by the ARRA are produced in the United States. This includes iron or steel components that are made up of mostly or entirely iron or steel.</p> <p>There are some exceptions to this requirement, including:</p> <p>If it would be inconsistent with the public interest to apply the domestic preference</p> <p>If the cost of using domestic iron, steel, or manufactured goods would increase the project cost by more than 25%</p> <p>If the United States doesn't produce enough iron, steel, or manufactured goods of satisfactory quality</p> <p>If a state chooses to include an alternate bidding provision in the project advertisement</p>	<b>Domestic Melted and Poured Material (also known as MPUSA)</b>
EPA Revolving Funds AIS requirement	<p>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.</p>	<b>Domestic Melted and Poured Material (also known as MPUSA)</b>

Provision	Guidance Language	Requirement
LEED v4.1 (current) (Supersedes LEEDv3 and LEEDv4)	<p>Please note that this requirement can vary based on the strategy that the project is pursuing to achieve LEED credits and which level of LEED accreditation the project is pursuing. Most notably the location of the steel production location relative to the project may impact this credit calculation.</p> <p>Standalone credits are awarded for recycled content, including:</p> <p><b>MRc3 Sourcing of Raw Materials – Recycled Content</b></p> <p>For simplicity all LEED projects should include both domestic and high recycled content material.</p>	<p><b>Domestic Melted and Poured AND High-Recycled Content Material</b></p> <p>(Note that all high-recycled content sources are currently domestic)</p>
Customer Specific Lower Carbon Intensity Requests	<p>Unless otherwise agreed, please discuss this requirement with Director of Sales and Technical Manager before accepting or confirming quote or order. Specific sourcing strategies may be required.</p>	<p><b>Customer Specific Domestic Melted and Poured AND High-Recycled Content Material</b></p>

#### Order entry considerations LEED & Low Carbon Intensity ('RC\_LEED' or 'RC\_Other')

- If 'RC\_Other' is selected, please note the minimum total recycled content required by the customer as a %, and include this on the Tech Note.
- If 'RC\_LEED' is selected, please note the minimum post and/or pre-consumer recycled content required by the customer as a %, and include this on the Tech Note.
- This helps to expedite the hot roll band assignment by quality systems. For either selection, quality will compare the numbers provided to our EAF supplier's hot rolled coil letters for compliance (also confirming with Procurement about special bands in inventory) before assigning hot band and approving the order item.