



### Federal Requirements Table for Clean Water SRF Projects—General

This table lists general federal requirements that must be addressed by Sponsors with a Clean Water (CW) SRF Project. For more information, see Guide to Federal Requirements—General\*. *Project permitting, bidding and the loan application process also have specific procedures and requirements.*

\*SRF Guidance Information - [scdhec.gov/srfguidance](http://scdhec.gov/srfguidance).

\*\*SRF and SRF-related EPA Forms - [scdhec.gov/srfforms](http://scdhec.gov/srfforms).

Requirement	When to Address	Where to Find More Information	Sponsor Action	DHEC Action
✓ <b>Utility Sustainability Assessment (UtSA)</b>	<ul style="list-style-type: none"> <li>As soon as decision is made to apply to SRF, but must be before loan closing</li> </ul>	<ul style="list-style-type: none"> <li>DHEC 0574** - Utility Sustainability Assessment (UtSA)</li> </ul>	<ul style="list-style-type: none"> <li>Sponsor completes and submits DHEC 0574** and supporting documentation.</li> <li>Sponsors who have received a satisfactory score within three years of starting a project, may be exempt from submitting a UtSA.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC financial staff review UtSA and assigns a score.</li> <li>Sponsors who do not meet the minimum score are asked to address deficiencies and resubmit unless the project is expected to correct a deficiency that will improve the score.</li> </ul>
✓ <b>Environmental Review</b>	<ul style="list-style-type: none"> <li>As part of preparing the Preliminary Engineering Report (PER)</li> </ul>	<ul style="list-style-type: none"> <li>Guide to PERs for Clean Water*</li> </ul>	<ul style="list-style-type: none"> <li>Sponsor/Consultant includes relevant environmental information (including any known impacts) in the PER.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC Project Manager (PM) reviews project information and determines what level of environmental review is required. For many projects, DHEC will request comments from resource agencies.</li> <li>DHEC PM will issue environmental decision (e.g., Categorical Exclusion, Finding of No Significant Impact).</li> </ul>
✓ <b>Cost &amp; Effectiveness (C&amp;E)</b>	<ul style="list-style-type: none"> <li>As part of preparing the Preliminary Engineering Report (PER)</li> </ul>	<ul style="list-style-type: none"> <li>CWSRF Cost and Effectiveness Analysis Guide*</li> </ul>	<ul style="list-style-type: none"> <li>Sponsor/Consultant includes alternatives analysis for cost and effectiveness, including water and energy conservation, in the PER submitted to DHEC.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC PM reviews C&amp;E analysis in PER to determine if the analysis is valid for the project.</li> </ul>
✓ <b>Fiscal Sustainability Plan (FSP)</b>	<ul style="list-style-type: none"> <li>Before loan is signed (if existing FSP) OR prior to request for final disbursement (if have to develop a FSP)</li> </ul>	<ul style="list-style-type: none"> <li>Guide to Federal Requirements—General*</li> </ul>	<ul style="list-style-type: none"> <li>Certify that a fiscal sustainability plan (FSP) exists that covers the project components and satisfies asset inventory, evaluation of asset condition, and evaluation of water &amp; energy conservation including a plan for maintenance, repair and/or replacement of assets, with funding considerations addressed.</li> <li>OR</li> <li>Develop an FSP and certify that it covers the constructed components before the final request for reimbursement.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC PM reviews FSP to determine if it fulfills FSP requirements.</li> </ul>
✓ <b>Civil Rights (Non-Discrimination)</b>	<ul style="list-style-type: none"> <li>Prior to loan closing</li> </ul>	<ul style="list-style-type: none"> <li>Guide to Federal Requirements—General*</li> </ul>	<ul style="list-style-type: none"> <li>Review EPA 4700-4** and self-assess non-discrimination practices.</li> </ul>	<ul style="list-style-type: none"> <li>NA</li> </ul>
✓ <b>Parties Excluded from Federal Procurement and Non-Procurement Programs</b>	<ul style="list-style-type: none"> <li>Prior to bidding, during bidding and during construction</li> </ul>	<ul style="list-style-type: none"> <li>Guide to Federal Requirements—General*</li> </ul>	<ul style="list-style-type: none"> <li>Sponsor, prime contractor and any subcontractors whose contract is &gt;\$25,000 must certify ability to do business with government on DHEC 3590**.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC PM reviews and verifies accuracy of certification using a Federal database – for primes and subcontractors this is part of the bid package approval process.</li> </ul>
✓ <b>American Iron and Steel (AIS)</b>	<ul style="list-style-type: none"> <li>Prior to bidding, during bidding, and during construction</li> </ul>	<ul style="list-style-type: none"> <li>Guide to Federal Requirements—General*</li> </ul>	<ul style="list-style-type: none"> <li>Sponsor/Consultant must specify American made iron &amp; steel products in project specs.</li> <li>Work with DHEC to obtain a waiver if unable to source an item domestically.</li> <li>Collect manufacturer's certifications.</li> <li>If necessary, track any de minimis items and keep the value to &lt; 5% of construction costs.</li> <li>Certify on DHEC 2556 and 0962** as applicable.</li> </ul>	<ul style="list-style-type: none"> <li>DHEC PM reviews bid documents for compliance with requirement to specify American made iron and steel.</li> <li>DHEC SRF staff may perform onsite inspection during construction to review manufacturer certifications and inspect materials for compliance.</li> <li>DHEC SRF staff applies to EPA for waivers (if required).</li> </ul>

<p>✓ <b>Davis Bacon (DB) and Related Acts</b></p>	<ul style="list-style-type: none"> <li>• Prior to bidding, during bidding, and during construction</li> </ul>	<ul style="list-style-type: none"> <li>• Guide to Federal Requirements—General*</li> </ul>	<ul style="list-style-type: none"> <li>• Sponsor/consultant include required contract conditions (CW &amp; DW SRF Permit Guidance – Appendix A) and correct DB wage determination (WD) in bid documents and final contract.</li> <li>• Require selected prime to post DB WD onsite and include DB language &amp; WD in any/all subcontracts.</li> <li>• Receive for review and retention weekly certified payrolls from all contractors and subs – all must comply with DB requirements.</li> <li>• Perform one set of employee interviews at minimum.</li> <li>• Certify DB compliance on DHEC 2557**.</li> </ul>	<ul style="list-style-type: none"> <li>• DHEC PM checks for correct WD in bid documents.</li> <li>• DHEC SRF staff assist with obtaining a wage for positions that are not found on the WD.</li> <li>• DHEC SRF staff may perform onsite review of DB compliance, including checking for required postings, certified payrolls, &amp; documentation of interviews.</li> </ul>
<p>✓ <b>Signage</b> <i>(applies to construction projects funded through BIL General Supplemental capitalization grants)</i></p>	<ul style="list-style-type: none"> <li>• Prior to and including construction start</li> </ul>	<ul style="list-style-type: none"> <li>• Guide to Signage—Bipartisan Infrastructure Law Projects</li> </ul>	<ul style="list-style-type: none"> <li>• Create a sign that meets EPA requirements and post it throughout the construction period.</li> </ul>	<ul style="list-style-type: none"> <li>• DHEC PM reviews sign and determines that Sponsor has created and made public a sign that fulfills the EPA requirements.</li> </ul>