May 20, 2011

To Whom It May Concern:

This letter is intended to describe the country of manufacture for fabricated HDPE pipe fittings and their conformance to the “Buy American” provisions of the ARRA. Please refer to the attached matrix illustrating the material’s relationships to the requirements of the act. This form was developed to create a template by which material origin can be evaluated as per the ARRA.

Note that we use HDPE pipe extruded by others as a raw material. Because some components and materials are not domestic U.S. in origin, we are unable to comply with the provision of Item 1 on the attached form.

However, conformance with any one of the Items 1, 2 or 3 qualifies material as ARRA compliant. Our provided material conforms with both Item 2 and 3.

Item 2a and 2b concern the alteration of one good to another. We fabricate fittings using HDPE pipe as a raw material. Our operation changes the physical properties of the pipe good into one of another use—a pipe fitting. This change results in the change of a product with one use into a product with a different use. Therefore, these products satisfy the requirements of Items 2a and 2b.

Items 3a-e concern the manufacturing process we employ. A short description of our process might help to explain my responses to these questions. As a raw material, the HDPE pipe must be precisely cut to pre-determined lengths. Fabrication of some configurations require that portions of this material be heated until pliable, while keeping other portions cold and rigid. The pliable portions of the HDPE pipe section are then formed and shaped over or inside of steel tooling on manually operated hydraulic presses. The thermo-formed plastic fitting is then cooled so as to retain its new shape. Several such fabricated components may then be joined to complete fabrication. Butt-fusion joining of HDPE pipe segments and fitting sub-components is a costly, time intensive and highly skilled process that requires several distinct steps. Because the manufacturing of these fittings requires the above, the processes satisfy the requirements of Items 3 a-e.

All fabricated HDPE fittings are manufactured at our Bellingham WA or Stevensville MT locations.

If you have any questions or need more information, please contact me.

Sincerely,

Brad Sukolsky
Technical/QC Department
Specified Fittings