



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 - des.sc.gov/SRFGuidance.

**SRF and SRF-related EPA Forms - des.sc.gov/SRFforms.

Requirement	When to Address	Where to Find More Information	Sponsor Action	SCDES Action
✓ Utility Sustainability Assessment (UtSA)	<ul style="list-style-type: none"> As soon as decision is made to apply to SRF, but must be before loan closing 	<ul style="list-style-type: none"> DES 0574** - Utility Sustainability Assessment (UtSA) 	<ul style="list-style-type: none"> Sponsor completes and submits DES 0574** and supporting documentation. Sponsors who have received a satisfactory score within three years of starting a project, may be exempt from submitting a UtSA. 	<ul style="list-style-type: none"> SCDES financial staff review UtSA and assigns a score. 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.
✓ Environmental Review	<ul style="list-style-type: none"> As part of preparing the Preliminary Engineering Report (PER) 	<ul style="list-style-type: none"> Guide to PERs for Clean Water* 	<ul style="list-style-type: none"> Sponsor/Consultant includes relevant environmental information (including any known impacts) in the PER. 	<ul style="list-style-type: none"> SCDES Project Manager (PM) reviews project information and determines what level of environmental review is required. For many projects, SCDES will request comments from resource agencies. SCDES PM will issue environmental decision (e.g., Categorical Exclusion, Finding of No Significant Impact).
✓ Cost & Effectiveness (C&E)	<ul style="list-style-type: none"> As part of preparing the Preliminary Engineering Report (PER) 	<ul style="list-style-type: none"> CWSRF Cost and Effectiveness Analysis Guide* 	<ul style="list-style-type: none"> Sponsor/Consultant includes alternatives analysis for cost and effectiveness, including water and energy conservation, in the PER submitted to SCDES. 	<ul style="list-style-type: none"> SCDES PM reviews C&E analysis in PER to determine if the analysis is valid for the project.
✓ Fiscal Sustainability Plan (FSP)	<ul style="list-style-type: none"> Before loan is signed (if existing FSP) OR prior to request for final disbursement (if have to develop a FSP) 	<ul style="list-style-type: none"> Guide to Federal Requirements—General* 	<ul style="list-style-type: none"> 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 & energy conservation including a plan for maintenance, repair and/or replacement of assets, with funding considerations addressed. OR Develop an FSP and certify that it covers the constructed components before the final request for reimbursement. 	<ul style="list-style-type: none"> SCDES PM reviews FSP to determine if it fulfills FSP requirements.
✓ Civil Rights (Non-Discrimination)	<ul style="list-style-type: none"> Prior to loan closing 	<ul style="list-style-type: none"> Guide to Federal Requirements—General* 	<ul style="list-style-type: none"> Review EPA 4700-4** and self-assess non-discrimination practices. 	<ul style="list-style-type: none"> NA
✓ Parties Excluded from Federal Procurement and Non-Procurement Programs	<ul style="list-style-type: none"> Prior to bidding, during bidding and during construction 	<ul style="list-style-type: none"> Guide to Federal Requirements—General* 	<ul style="list-style-type: none"> Sponsor, prime contractor and any subcontractors whose contract is >\$25,000 must certify ability to do business with government on DES 3590**. 	<ul style="list-style-type: none"> SCDES PM reviews and verifies accuracy of certification using a Federal database – for primes and subcontractors this is part of the bid package approval process.

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<p>✓ American Iron and Steel (AIS)</p>	<ul style="list-style-type: none"> • Prior to bidding, during bidding, and during construction 	<ul style="list-style-type: none"> • Guide to Federal Requirements—General* 	<ul style="list-style-type: none"> • Sponsor/Consultant must specify American made iron & steel products in project specs. • Work with DES to obtain a waiver if unable to source an item domestically. • Collect manufacturer’s certifications. • If necessary, track any de minimis items and keep the value to < 5% of construction costs. • Certify on DES 2556 and 0962** as applicable. 	<ul style="list-style-type: none"> • SCDES PM reviews bid documents for compliance with requirement to specify American made iron and steel. • SCDES SRF staff may perform onsite inspection during construction to review manufacturer certifications and inspect materials for compliance. • SCDES SRF staff applies to EPA for waivers (if required).
<p>✓ Davis Bacon (DB) and Related Acts</p>	<ul style="list-style-type: none"> • Prior to bidding, during bidding, and during construction 	<ul style="list-style-type: none"> • Guide to Federal Requirements—General* 	<ul style="list-style-type: none"> • Sponsor/consultant include required contract conditions (CW & DW SRF Permit Guidance – Appendix A) and correct DB wage determination (WD) in bid documents and final contract. • Require selected prime to post DB WD onsite and include DB language & WD in any/all subcontracts. • Receive for review and retention weekly certified payrolls from all contractors and subs – all must comply with DB requirements. • Perform one set of employee interviews at minimum. • Certify DB compliance on DES 2557**. 	<ul style="list-style-type: none"> • SCDES PM checks for correct WD in bid documents. • SCDES SRF staff assist with obtaining a wage for positions that are not found on the WD. • SCDES SRF staff may perform onsite review of DB compliance, including checking for required postings, certified payrolls, & documentation of interviews.