



EDMUND A. GRAY COMPANY

Since 1910 · Manufacturer of Pipe Nipples – Distributor of Pipe Fittings & PVF Specialties
2277 East Fifteenth Street · Los Angeles, CA 90021-2841 · (213) 625-2723 · eagrays.com

COUNTRY OF ORIGIN & DOMESTIC CONTENT STATEMENT

Buy America · Build America, Buy America (BABA) · Buy American Act

Revised 10.05.2026. Supersedes “Manufactured in the USA Statement & Clarification” (rev. 09.01.2024) and its attachments.

OUR MANUFACTURING

Edmund A. Gray Company has manufactured pipe nipples at our factory at 2277 East Fifteenth Street in Los Angeles, California, since 1910. We cut, thread, inspect and package steel, stainless steel, brass, aluminum and plastic pipe nipples. We also distribute malleable iron, bronze, merchant steel and aluminum pipe fittings made by other manufacturers.

We purchase pipe, our principal raw material, from both domestic mills and foreign sources. Domestic-preference programs look at where the pipe itself was made, not only where our cutting and threading take place. U.S. Customs has held that cutting steel pipe to length and threading it does not change the pipe’s country of origin. For that reason, the origin of the pipe determines which programs a given nipple can satisfy.

TWO PRODUCT STREAMS

- **Domestic-Material Program (available on request).** Nipples manufactured in Los Angeles from pipe produced in the United States: for steel and stainless steel, melted and manufactured in the U.S., including any galvanizing or other coating; for aluminum, smelted or melted and formed in the U.S.; for plastic, compounded and formed in the U.S. Supplied with traceable mill test reports and an EAG Domestic Content Certification. This is the product we offer for any project subject to BABA, FHWA, FTA, FAA or federal Buy American Act requirements.
- **Standard stock.** Nipples manufactured in Los Angeles from domestic and/or imported pipe. Unless we issue a written Domestic Content Certification for the specific order, standard stock is represented as manufactured in the USA from globally sourced raw materials. It is not represented as compliant with any domestic-preference program, and it is not represented as “Made in USA” without that qualification. The country of origin of the pipe is available on request.
- **Brass nipples.** Red brass pipe is no longer produced in the United States, so domestic-material brass nipples are not available. Our brass nipples are manufactured in the USA from globally sourced pipe and cannot be certified as compliant with domestic-preference programs. Where a project requires compliance, the award recipient or contracting agency may seek a nonavailability waiver or exception from the funding agency; on request we will provide the pipe’s country of origin and a written statement of our domestic sourcing efforts to support that request.
- **Distributed fittings.** Fittings we distribute carry the country of origin marked by their manufacturer. We will pass along any country-of-origin or domestic-content documentation the manufacturer provides, but we do not independently certify the origin of fittings we did not make.



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PROGRAM REQUIREMENTS AT A GLANCE

Summary of the domestic-content standards most often specified for our products. The governing statute, regulation, funding agreement and contract documents control.

Program & authority	Where it applies	Steel & stainless steel nipples	Brass, aluminum & plastic nipples
Build America, Buy America (BABA) IIJA §§ 70901–70927; 2 CFR Part 184	Infrastructure projects funded by federal financial assistance (grants, loans, cooperative agreements)	Iron or steel product: all manufacturing processes, from initial melting through application of coatings, in the U.S.	Non-ferrous metals: all processes from initial smelting or melting through final shaping, coating and assembly in the U.S. Plastic/polymer: all processes from initial combination of inputs to final form in the U.S. Classification is set by the funding agency.
FHWA Buy America 23 U.S.C. § 313; 23 CFR 635.410	Federal-aid highway and bridge projects	Steel/iron, including coatings: all manufacturing processes in the U.S. (limited minimal-use allowance per 23 CFR 635.410)	Manufactured products: final assembly in the U.S. (projects obligated on or after 10/1/2025) and more than 55% domestic component cost (projects obligated on or after 10/1/2026).
FTA Buy America 49 U.S.C. § 5323(j); 49 CFR Part 661	Transit capital projects funded by FTA	Steel/iron: all manufacturing processes in the U.S.	Manufactured products: all manufacturing processes in the U.S. and all components of U.S. origin.
FAA Buy American Preference 49 U.S.C. § 50101, applied together with BABA	Airport Improvement Program (AIP) projects	Steel produced in the U.S. under the BABA melt-through-coating standard; sponsors certify 100% U.S. content absent an FAA waiver.	Manufactured goods: 100% U.S. content absent a case-specific FAA waiver.
Federal Buy American Act 41 U.S.C. §§ 8301–8305; FAR Part 25	Direct purchases and construction contracts by federal agencies	End products wholly or predominantly of iron/steel: foreign iron and steel must be less than 5% of component cost.	Manufactured in the U.S. with domestic components exceeding 65% of component cost (deliveries 2024–2028), rising to 75% for deliveries from 2029. Trade-agreement rules may apply instead on covered acquisitions.
ARRA § 1605 (2009) American Recovery and Reinvestment Act	Historical; superseded in practice by the programs above	Requests citing ARRA are filled from our Domestic-Material Program.	Same.



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ORDERING COMPLIANT PRODUCT

Please state the requirement on your RFQ and purchase order, before the order is placed:

- The program (for example BABA, FHWA Buy America, FTA Buy America, FAA, or FAR Buy American) and the project name and funding agency.
- Whether a Domestic Content Certification and mill test reports are required.
- Domestic material may carry different pricing and lead times. Requirements cannot be applied retroactively to material already shipped from standard stock.

With each Domestic-Material Program shipment we can provide an EAG Domestic Content Certification referencing your purchase order, our sales order and invoice numbers, the project, and the applicable program, together with mill test reports showing the country of melt and manufacture and heat traceability.

“MADE IN USA” REPRESENTATIONS

The Federal Trade Commission’s Made in USA Labeling Rule (16 CFR Part 323) permits an unqualified “Made in USA” claim only when final assembly or processing and all significant processing occur in the United States and all or virtually all components are made and sourced in the United States. California Business & Professions Code § 17533.7 limits foreign content to 5% of the product’s final wholesale value (10% where the foreign content cannot be obtained domestically). Accordingly:

- Domestic-Material Program nipples may be represented as Made in USA.
- Standard-stock nipples are represented as “Manufactured in USA from globally sourced raw materials,” with the country of origin of the pipe identified on request. This is a qualified claim: we do not represent standard stock as Made in USA without that qualification, or as Buy America or BABA compliant.

RESPONSIBILITIES AND LIMITATIONS

Whether a domestic-preference program applies to a project, and whether any waiver (such as de minimis, small project, nonavailability, public interest or unreasonable cost) is available, is determined by the funding agency and the award recipient. EAG certifications cover only the products we supply and only to the extent stated in the certification. This statement is a general summary provided for convenience; it is not legal advice, and regulations and agency guidance change. Questions may be directed to the contact below.

Edmund A. Gray Company

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