



December 12, 2024

To Whom it May Concern,

I am writing to certify that Composite Access Products (CAP) complies with requirements of the Build America, Buy America Act, (BABA).¹

The BABA law classifies a composite manhole cover and frame as a “**Manufactured Product**” defined in § 184.3.

“Articles, materials, or supplies that have been: (i) Processed into a specific form and shape; or (ii) Combined with other articles, materials, or supplies to create a product with different properties than the individual articles, materials, or supplies.”

So, to comply for US federal infrastructure projects, Manufactured Products must pass two conditions stated in § 184.3:

- (i) ***The product was manufactured in the United States; and***
- (ii) ***The cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product.***

CAP manufactures 100% of our composite cover and frame assemblies in the USA at our own facility in McAllen, TX. To be specific, CAP combines various raw materials (e.g. resins, fiberglass, etc.), and molds them in our 800-ton compression press at about 300F. Once molded, CAP employees extract, deflash, and finally add required accessories to the molded parts. We combine the covers and frames with added fastening hardware and then palletize, band and wrap. The molding process causes a complete molecular transformation where a new chemical bond is formed between the polymer chains; this is called “crosslinking” or “curing” of the thermoset and is an irreversible reaction. We keep records of the curing times for each cover (and we are the only company to do so). CAP does not have any other third-party supplier perform the molding step like some of our competitors who claim to “design and assemble” in the USA. CAP truly manufactures in McAllen, Texas with an American workforce and American ownership.

Secondly, over 80% of total component costs for CAP composite covers and frames are also manufactured in the USA. Therefore, CAP’s products comply with BABA and can be used for US federal projects.

Sincerely,

W. Chad Nunnery, President & Owner

¹ Division G, title IX, subtitle A, parts I-II, sections 70901 through 70927 of the Infrastructure Investment and Jobs Act (Pub. L. 117-58) and CFR Title 2/Subtitle A/Chapter I/ Part 184 refers to “Buy American Preferences for Infrastructure Projects.”

COMPOSITE ACCESS PRODUCTS, L.P. (CAP)

5216 N.26TH STREET • MCALLEN, TX 78504 • WWW.JUSTCAPTHAT.COM

(844) 344-CAP1 (2271) • (956) 331-8232 • sales@compositeap.com