DFARS 252.225-7009 Specialty Metals & Domestic Melt Compliance

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Verification & Authority Baseline: Binding DoD federal regulation (48 CFR § 252.225-7009; 10 U.S.C. § 4863). Requires titanium, Inconel, superalloys, and specialty steels in defense/space hardware to be melted or produced in the US or a qualifying country, with full mill-to-part traceability.



Alloy Family	DFARS 252.225-7009 Rule	Required Shop Record
Titanium & Ti-6Al-4V	Melted in US or qualifying country	Mill Test Report (MTR) showing country of melt
Inconel / Nickel Superalloys	Melted in US or qualifying country	Heat-lot traceable MTR + CoC
COTS Fasteners / 2% De Minimis	Narrow statutory exceptions apply	Documented exception basis on PO file

Who Issues This Ask, Authority, and Binding Status

Every DoD prime and Tier-1 integrator flows down **DFARS 252.225-7009** (*Restriction on Acquisition of Certain Articles Containing Specialty Metals*) on propulsion, structural, and fastener subcontracts.

Binding status: `48 CFR § 252.225-7009` is **binding US federal law** implementing `10 U.S.C. § 4863`. Any specialty metal (titanium, nickel-iron/Inconel superalloys, cobalt alloys, specialty steels) delivered under a covered DoD contract must be melted in the United States, its outlying areas, or a **qualifying country** (per DFARS 225.872-1), unless a narrow statutory exception applies (e.g., COTS fasteners, 2% de minimis non-high-performance electronics).

Evidence Required & Small-Supplier Effort Cost

Suppliers satisfy the clause by maintaining **original Mill Test Reports (MTRs)** showing heat number and **country of melt**, flowing the clause down to all sub-tier bar/forging vendors, and issuing a signed **DFARS 252.225-7009 Certificate of Compliance** with each shipment.

Material price premiums for domestic/qualifying-country melt vs. non-compliant stock vary by alloy market conditions and are **not in our data**.

WA Space Cluster Segments & Companies Affected

Directly impacts WA hard-metal and propulsion fabricators in Components & Suppliers (Space Valves, Karman Space & Defense) and Adjacent Aerospace (Exotic Metals Forming, Tessera, Orion Industries).

Verified Primary Sources & Internal Bridges

• eCFR — DFARS 252.225-7009 (Specialty Metals):
https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252/subpart-252.2/section-252.225-7009

• eCFR — DFARS 252.225-7001 (Buy American):
https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252/subpart-252.2/section-252.225-7001