November 18, 2014

Byron Shaw, 
SRF Engineering Unit Chief 
P.O. Box 176 
1101 Riverside Dr 
Jefferson City, MO 65102-0176 
RE: ST JOSEPH EASTSIDE CANDY CREEK PUMP STATION PROJECT 
AMERICAN IRON AND STEEL REQUIREMENT WAIVER REQUEST 

Dear Mr. Shaw:

GENERAL:
The design of pump station piping on the Eastside Candy Creek Pump Station Project includes grooved fittings. A letter from the manufacturer (attached) states they manufacture grooved fittings up to 12-inch diameter domestically; however, fittings larger in diameter are manufactured overseas.

- **Description of the foreign and domestic construction materials**
  Attached is a plan view showing piping in the referenced pump station. There are thirteen (13) fittings 16-inch diameter totaling $31,847.39 (see attached breakdown).

- **Unit of measure**
The unit of measure is each.

- **Quantity**
  There are thirteen (13) fittings 16-inch diameter detailed as follows:

<table>
<thead>
<tr>
<th>Description</th>
<th>Item</th>
<th>Quantity</th>
<th>Unit Price</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>16&quot; VIC #10-CF GRV C110</td>
<td>1</td>
<td>3</td>
<td>$4,950.00</td>
<td>$14,850.00</td>
</tr>
<tr>
<td>FLARE X 90</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16&quot; X 8&quot; VIC STYLE 50-C CONC</td>
<td>2</td>
<td>3</td>
<td>$1,549.56</td>
<td>$4,648.67</td>
</tr>
<tr>
<td>REDUCER</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16&quot; VIC STYLE 60-C CAP</td>
<td>3</td>
<td>1</td>
<td>$1,571.59</td>
<td>$1,571.59</td>
</tr>
<tr>
<td>16&quot; X 10&quot; VIC STYLE 25-C TEE</td>
<td>4</td>
<td>3</td>
<td>$1,923.59</td>
<td>$5,770.77</td>
</tr>
<tr>
<td>16&quot; VIC STYLE #11-C 45 ELL</td>
<td>5</td>
<td>1</td>
<td>$1,245.40</td>
<td>$1,245.40</td>
</tr>
<tr>
<td>16&quot; VIC STYLE #10-C 90 ELL</td>
<td>6</td>
<td>2</td>
<td>$1,893.98</td>
<td>$3,787.95</td>
</tr>
<tr>
<td>TOTAL IMPORT COST</td>
<td></td>
<td>13</td>
<td></td>
<td>$31,874.39</td>
</tr>
</tbody>
</table>

- **Price**
The price shown in Table 1 is $31,874.39
• **Time of delivery or availability**
  Delivery time will take 10 to 12 weeks following approval of the waiver request. See attached e-mail.

• **Location of the construction project**
  The construction project is east of St Joseph, Missouri, located in Section 28, Township 57N, Range 34W.

• **Name and address of the proposed supplier**
  Ferguson, Plant Division
  1820 N Willow Ave.
  Broken Arrow, OK 74012-9169
  Phone: (918) 459-9544
  Fax (918) 459-9555

• **A detailed justification for the use of foreign construction materials**
  As justification for the use of foreign construction materials the City has standardized on grooved couplings for their process piping at their wastewater facilities. There was, until recently, a domestic manufacturer who made grooved couplings to AWWA standards; however, this firm has gone out of business. Another domestic manufacturer does make grooved couplings; however, this firm does not manufacture to AWWA standards. Therefore, the fittings required are not available domestically.

**AVAILABILITY WAIVER REQUESTS**

• **Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials**
  - **Availability:** In a letter dated November 18, 2014 from Furguson Waterworks, the manufacturer states:
    
    "There are currently only two Manufacturers of AWWA Grooved fittings and couplings in the United States. Victaulic produces many items Domestically, but they do not produce AWWA fittings above 12" in diameter in the United States. The other Manufacturer- Star Pipe Products, does not produce AWWA fittings or couplings in the United States, they are all imported. Anvil International produces Grooved fittings and Couplings in the United States - "Gruvlok", but they do not manufacture AWWA (Ductile Iron O.D.) fittings or couplings at this time."
  
  - **Delivery date:** In an e-mail from the contractor, he states delivery will be 10-12 weeks from receipt of waiver approval and approved shop drawings.
• Documentation of the assistance recipient’s efforts to find available domestic sources, such as a description of the process for identifying suppliers and a list of contacted suppliers.

The Engineer (Snyder & Associates) on behalf of the City of St. Joseph, Missouri, contacted Anvil International who manufactures “Gruvlok” fittings in the United States. We confirmed these fittings do not comply with AWWA standards for fittings. Anvil does manufacture 16-inch diameter ductile iron fittings for fire and plumbing service, but they do not manufacture 16-inch diameter ductile iron flared end 90 degree elbows required for the wet well suction fitting. We were unable to find a manufacturer that could fabricate this fitting domestically.

• Project schedule

We have attached a preliminary project schedule for the Eastside Candy Creek Pump Station as prepared by Garney Construction.

• Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials

  o **Plans:** See attached plan sheet PR2.05 is included to show the impacted fittings. The plan sheet shows the process piping where the grooved fittings are shown.
  o **Specifications:** We have attached the specification for Mechanical Grooved Pipe & Fittings. A list of the subject fittings are presented in Table 1 above.

• Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought.

Attached is a letter from Ferguson Waterworks stating ductile iron AWWA fittings above 12-inch diameter are not available domestically.
On behalf of the City of St Joseph, Missouri, we request a waiver to purchase these few fittings for the project.

Please contact me if you have questions or need further clarification to move on this request for waiver.

Respectfully submitted,

Snyder & Associates, Inc.

Alexander E. Macias P.E.
Project Manager

AEM/rmp

Enclosures

CC: David Frazier – City of St. Joseph.
The waiver request from the City of St Joseph included additional attachments. These attachments did not meet the accessibility requirements for posting on EPA's website, therefore they have been withheld from this waiver publication. In general, the additional attachments included the City's correspondence with suppliers regarding their attempts to locate domestic supply meeting their specifications in addition to item drawings and project schedules. These attachments may be requested from EPA by submitting an email to SRF_AIS@epa.gov.