February 18, 2015

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 NO. 2

Dear Mr. Shaw:

GENERAL:
The design of pump station piping on the Eastside Candy Creek Pump Station Project includes three (3) 4-inch diameter stainless steel A.R.I. brand air release/vacuum valves to be installed on the new 16-inch diameter force main in the project. A letter from the manufacturer (attached) states they manufacture 4-inch diameter stainless steel air release/vacuum valves overseas (Israel).

- **Description of the foreign and domestic construction materials**
The design includes three (3) 4-inch diameter stainless steel A.R.I. air release/vacuum valves to be installed on the new Candy Creek Pump Station force main. The City has standardized on this brand of air/vacuum valve. (See attached memorandum) The City’s utilizes the A.R.I air/vacuum valves on other force mains throughout the City and the City maintains replacement A.R.I parts and air release/vacuum valves in stock. The valve has the advantage of a body shape with clearance between the float and the body to prevent grease buildup from capturing the float. The 4-inch line size facilitates grease and debris entering the valve to fall back into the main pipeline resulting in less need to flush and otherwise maintain the valve. The stainless steel construction eliminates the need to remove the valve for cleaning and re-coating; cast iron valve construction over time corrodes in the high sulfide environment requiring reconditioning and re-coating to restore functionality.

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

- **Quantity**
There are three (3) 4-inch diameter stainless steel A.R.I. air release/vacuum valves on the project.
• Price
The price for the (3) 4-inch diameter stainless steel A.R.I. air release/vacuum valves is $6,207.00 ea for a total of $18,621.00.

• Time of delivery or availability
Delivery time will take approximately 3 weeks following approval of the waiver request.

• 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
Kansas City Winwater, Inc.
3939A NE 33rd Terrace
Kansas City, Missouri 64117
Phone: (816) 459-8600
Fax (816) 459-8622

• A detailed justification for the use of foreign construction materials
The City has standardized on the A.R.I. air release/vacuum valve (see attached letter) and maintains spare parts and spare valves on hand for these valves. The City cites the following reasons for standardizing on these valves:

1. All connection sizes, because of the bulbous shape tend to cause any solids or grease to slide back into the force main where cast iron valve bodies have closer tolerances and tend to clog up and become inoperable until cleaned.
2. The A.R.I. valves in both stainless steel and Nylon are lighter for installation on PVC type force mains and do not cause pipe deflection or breakage of the attachment point.
3. With their lighter construction, repairs, and cleaning are much easier in that the valve can be disassembled within the manhole without a crane or lifting apparatus.
4. The ARI valve is constructed so that in operation less debris or grease enters the valve providing protection against fouling of the relief mechanism.

In addition, domestic cast iron valve bodies tend to rust requiring removal for reconditioning and recoating. The lightweight stainless steel body does not experience rusting in the high hydrogen sulfide environment.

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 January 27, 2015 from Kansas City Winwater Company, the supplier states:

"Saint Joseph has changed out many of their traditional cast iron valves in their system due to clogging and corrosion. Their system has both some surge and grease concerns and ARI valve are designed to better handle these type of issues in pump station/force main applications. The City of Saint Joseph has standardized on ARI air valves due to performance, non-corrosive, ability to handle grease, and ease of maintenance."

Delivery date: In an e-mail from the contractor, he states delivery will be approximately 3 weeks from receipt of waiver approval and approved shop drawings.

Other manufacturers contacted include the following:

- **Crispin-Multiplex Mfg. Co., Berwick, PA.** These stainless steel air/vacuum valves are manufactured in sizes up to 2-inch diameter. 2-inch valves are not consistent with the requirement for 4-inch diameter which is specified to facilitate grease and debris to fall back into the main flow reducing clogging.

- **H-Tec, Inc of Marietta, GA.** Valves parts are manufactured in Germany and can be assembled in the US.

  The H-Tec valves have a tapered body providing space between the body and the float for enhanced removal of grease and debris into the flow stream. The H-Tec valves are available in
  - Stainless Steel ($3,229.47)
  - Carbon Steel Epoxy Coated ($2,080)

  Delivery is within a week of approval. The City has no spare parts for this valve.

- **Val-Matic Valve & Manufacturing Corporation, Elmhurst, IL.** These valves are available in
  - Cast Iron ($3,216 ea)
  - Ductile Iron ($3,570 ea) or
  - Stainless Steel ($9,403 ea).

  Delivery 3 weeks from approval of approval of submittals. Stainless steel would be much longer.
The body of these valves is relatively tight to the float which is of concern for grease and debris buildup between the body and the float. The City has no spare parts for this valve.

- **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 several valve manufacturers in an effort to find equivalent valves compliant with the AIS. Snyder conducted an internet search based in part with their experience with air/vacuum valve manufacturers known in the industry. See above discussion on Supplier information.

- **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 C3.03 is included to show the air vacuum valve manhole used on the project.
  
  o **Specifications:** We have attached the specification for the air/vacuum valve from Section 15100.

- **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 Kansas City Winwater Inc. who supplies the A.R.I. valves stating 4-inch diameter stainless steel A.I.R air/vacuum valves are not available domestically. (Israel).

On behalf of the City of St Joseph, Missouri, we request a waiver to purchase these three (3) valves 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.

NOTE: The referenced attachments with project diagrams, schedules, and supplier correspondence are in formats that do not meet the Federal accessibility requirements for publication on the Agency’s website. Hence, these exhibits have been omitted from this waiver publication. They are available upon request by emailing SRF_AIS@epa.gov.