CITY OF
SEQUIM

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December 11, 2015

Mr. David Dunn
Washington State Department of Ecology
Water Quality – Financial Management
PO Box 47600
Olympia, WA 98504-7600

SUBJECT: **Request for AIS availability waiver, WQC-2015-SequPW-00131 City of Sequim; Aerobic Digester Aeration and Headworks Improvements project**

Dear Mr. Dunn,

We are currently under construction on our Aerobic Digester Aeration and Headworks Improvement Project at our Water Reclamation Facility in Sequim, Washington. The facility is located in Clallam County and provides wastewater treatment for the City's municipal wastewater customers. The goal of the current Project is to improve the process and energy efficiency of the aerobic digestion process and for this, two new, efficient, positive displacement blowers are being installed. The airflow from these blowers to the fine bubble diffuser grid within the digester tanks is controlled by several pieces of equipment, including two 5-inch butterfly valves (Specification Section 15100-2.1) used for throttling and isolation of the air delivery piping. Due to their proximity to the blower exhaust air, the valves must be stainless steel and have seats and seals rated for temperatures up to 350 degrees Fahrenheit.

As this project is partially funded by the Washington State Water Pollution Control Revolving Fund, it is subject to the American Iron and Steel Provisions of the Federal Water Pollution Control Act. As such, all equipment utilizing iron and steel components must be made and manufactured within the United States (US). Unfortunately, the selected manufacturer for the butterfly valves referenced above does not manufacture 5-inch valves in the US. The manufacturer has stated that the manufacturing and delivery time for the valve from date of purchase is between 26-28 weeks. The construction contractor for the project contacted three other domestic valve manufacturers, all of whom indicated that they cannot supply the specified valves. The 5-inch butterfly valves are scheduled to be installed on or around February 1, 2016, and the lead time cited by the manufacturer will delay the project schedule beyond the completion date stated in the construction contract. The required valves are not available from a domestic

manufacturer at the time needed, and therefore are not produced in the United States in "sufficient and reasonably available quantities."

The City respectfully requests a waiver from the American Iron and Steel Provisions for these two 5-inch butterfly valves. We have provided additional documentation including email correspondence with domestic suppliers, the specification for the 5-inch butterfly valves, and the overall project schedule to support our request.

If you could please respond at your earliest opportunity, it would be greatly appreciated. If you have any questions, concerns, or need additional information, please contact me directly at (360) 683-4908 or via email at mklontz@sequimwa.gov.

Thank you very much for your assistance in this matter.

Sincerely,

Matt Klontz, P.E.
City of Sequim Engineer

This waiver request was submitted to the EPA by the state of Washington. All supporting correspondence and/or documentation from contractors, suppliers or manufacturers included as a part of this waiver request was done so by the recipient to provide an appropriate level of detail and context for the submission. Some 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.

SECTION 15100

VALVES

PART 1 GENERAL

1.1 SCOPE

The work specified in this Section shall consist of valves and accessories as shown on the Plans, described in these Specifications, and as required to completely interconnect all equipment with piping for complete operable systems.

1.2 RELATED WORK SPECIFIED ELSEWHERE

Section	Item
01200	Measurement and Payment
01300	Submittals
01800	Testing, Commissioning and Training
11000	Equipment General Provisions
Division 11	Equipment
Division 15	Mechanical

1.3 SUBMITTALS

Submit Catalog cuts and shop drawings in accordance with Section 01300 to demonstrate that the valves and appurtenances conform to the Specifications requirements.

The Contractor shall furnish manufacturer's installation and operation manuals, bulletins, and spare parts lists for all valves.

1.4 QUALITY ASSURANCE

All materials and equipment furnished under this Section shall be by the manufacturer specified.

PART 2 PRODUCTS

2.1 BUTTERFLY VALVES

Butterfly valves for air service shall be iron body and disc, Viton resilient seat, stainless steel shaft, bronze bearings, lug body style, suitable for service in air to 350 degrees F. Air service butterfly valves shall be DeZurick, Pratt, or equal.

Where butterfly valves are installed adjacent to check valves or other fittings, which interfere with the valve's full range operation, flange fillers, or other spacers, shall be installed between the valve and the obstructing fitting as necessary to insure unrestricted operation of the butterfly valve from full open to closed.

2.2 BALL VALVES

Ball valves, unless otherwise noted, shall have Type 316 stainless steel bodies with Type 316 stainless steel balls. Valves shall be with screwed ends, standard port, rated 600-pound WOG. Seat, body seal, and stem packing shall be reinforced TFE. Valves shall have lever operators. Valves shall be Hills-McCanna, Contromatics, Crane, Powell, or equal.

Ball valves on air piping shall be warranted for air service by the manufacturer.

2.3 VALVE IDENTIFICATION TAGS

Each shut-off or control valve, shall be provided with a 1-1/2-inch minimum diameter heavy brass tag. Tags shall bear the identifying number of the valve and one or more identifying letter symbols of the service line.

Numbers and letters shall be block type with 1/2-inch-high numbers and 1/4-inch-high letters stamped on the tags and filled with black enamel.

Attach tags to the valves by split-key rings soldered so that the ring and tag cannot be removed.

PART 3 EXECUTION

3.1 GENERAL

All valves and accessories shall be installed in a manner and location as shown on the Plans or as required for the application and in accordance with manufacturer's instructions. Valve size is fully equal to line piping in which the valve is installed unless otherwise noted on the Plans. Support all valves where necessary. In case on conflict between these Specifications and a governing code, the more stringent standard shall prevail.

All valves of the same style or type shall be furnished by a single manufacturer.

Provide all accessories necessary for proper valve operation as specified or required for the application.

Valves shall be installed with the operator in a position for convenient operation. Particular care shall be taken to insure that space is available for operation of lever or handwheel operated valves without interference to walls, piping or equipment. Any valve which is installed, in the opinion of the Engineer, in a manner that operation is inconvenient shall be modified or removed and reinstalled in a manner suitable to the Engineer at the expense of the Contractor. Operations for manual valves shall be lever or handwheel as is standard with the manufacturer unless another type of operator is specified or required by the manufacturer.

***** END OF SECTION *****