



May 13, 2016

Mr. Martin Taylor
State Water Resources Control Board/EPA
RE: West County Wastewater District
SRF Project Nos. C-06-8043-110, C-06-7876-130

Subject: AIS Availability Waiver Application for TR Flex Fittings

Dear Mr. Taylor:

The purpose of this application is to obtain an AIS availability waiver for the specified TR Flex ductile iron fittings in sizes ranging from 4" to 24" for these two fast track WWTP upgrade projects. These fittings are not produced within the United States (ref exhibit A). The projects in question are the Recycled Water Reliability Upgrades Project (\$24,422,000) and Miscellaneous Mechanical Improvements Project (\$1,954,000) located at the Water Pollution Control Plant in Point Richmond CA. Our application will generally follow the Information Checklist for Waiver Request form in appendix A:

General:

1. Description:
 - a. U.S. Pipe TR Flex ductile iron fittings in sizes ranging from 4" to 24," See attached exhibit 'A' from U.S. Pipe for further description.

2. Unit of Measure/Quantity/Pricing:
 - Qty. 6 - 90° 12 – inch.
 - Qty. 1 - 45° 12 – inch
 - Qty. 1 – 12 x 6 Reducing Tee
 - Qty. 3 - 90° 8 – inch.
 - Qty. 8 - 45° 6 – inch.
 - Qty. 4 - 45° 6 – inch
 - Qty. 12 – 90° 24 – inch
 - Qty. 4 - 45° 24 –inch
 - Total

3. Time of Delivery or Availability:
 - a. 4 weeks for waiver approval, plus 8-12 weeks delivery; Total ETA 12-16 weeks.

4. Location of Construction Projects:
 - a. Both projects are located at:
 - Water Pollution Control Plant
 - 2377 Garden Tract Rd.
 - Richmond CA, 94801

5. Name and Address of Proposed Supplier:
 - a. Jim LaVelle
Territory Account Manager
Ferguson Plant Division
1600 Lone Palm Ave.
Modesto, CA 95351
209-577-3333 Office
209-992-6697 Cell
209-529-6520 Fax
Email: jim.lavelle@ferguson.com
6. Supporting documentation including that the Contractor made a reasonable survey of the market, such as a description of the process for identifying suppliers and a list of contacted suppliers.
 - a. OVERAA Construction has contacted two of the main supplier in the area
7. Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials:
 - a. See attached exhibit A.
8. Contractor and/or supplier to provide a statement confirming the non-availability of the domestic construction material which is sought:
 - a. See attached exhibit A.
9. Has the State received other waiver requests for the materials described in the request for comparable projects?
 - a. We have attached three approved availability waivers for the TR Flex product. Please reference Exhibits B, C, and D.
10. Project Schedule:
 - a. The two affected projects combine for a total of \$26,376,000, the project's completion date is currently 6/3/17. Time is of the essence on the procurement of these fittings.
11. Engineering Discussion Re: TR Flex:
 - a. The Agency acknowledges that there are other methods of restraining pipe joints that use products other than the TR Flex push on fittings. However, for this particular project, the design engineer mandated the use of TR Flex fittings. Requiring the applicant use other methods of restraining pipe joints would result in significant redesign of the project, which in turn would cause delays in the project construction.
 - b. The buried piping on this project was designed to allow maximum deflection at the joints to accommodate differential settlement between the unsupported pipes and the pier/pile supported structures which they span between. Numerous existing pipes at

Mr. Martin Taylor
State Water Resources Control Board/EPA
May 13, 2016
Page 3

the facility have experienced differential settlement that resulted in leaking at the joints because they were not designed with adequate allowable deflection. TR Flex joints provide adequate allowable deflections and also offer restraint at the joint. Unrestrained mechanical joints offer similar allowable deflections to TR flex, but restraining a mechanical joint limits its allowable deflection. TR Flex's unique design provides restraint (to prevent lateral movement of the piping system) without sacrificing deflection. Substituting restrained mechanical joint fittings would introduce a significant redesign, would be significantly more expensive, and cause a significant delay in the project schedule. This is mainly due to the piles that would be required to be designed and installed under each pipe to support them and prevent differential settlement. To avoid pile installation under pipes, saving design and construction time and money, TR Flex fittings were chosen for this design.

Sincerely,

CAROLLO ENGINEERS, INC.



Jon Gudjohnsen,
Senior Construction Manager
Direct (925) 932-1710
Mobile: (925) 405-7617

JG:Imo

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.