



Queen
Anne's
County

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**DEPARTMENT OF PUBLIC WORKS
SANITARY DISTRICT**

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May 16, 2016

Mr. Walid Saffouri
MDE – WMA – ECPP
1800 Washington Boulevard
Baltimore MD 21230-1708

Re: Southern Kent Island Sanitary Project
Contract 16-02 – Community Mains
EPA – AIS Waiver Request
E-One Unilateral Curb-stop & Check Valve Assembly

Dear Mr. Saffouri:

Please accept this letter as application to EPA to allow the use of the E-One stainless steel curb stop with check-valve assembly in accordance with waiver condition 2 – *“iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality”*.

This product, while assembled in the United States, uses a casting from a foreign country. We believe it is unique and meets the intent of category 2 for the following reasons;

- We have found no other one piece curb-stop/check valve of a suitable robust material able to withstand the application for a service life of 50-years which is our desire. (In fact E-one makes a plastic version which we are confident our staff would readily break by over-torquing the valve – resulting in it being replaced with the stainless steel version – post WQRLF project – at an additional cost to no benefit).
- Its construction allows for the direct bury of the check valve assembly which is rare.
- Its check valve design allows for re-build in place in the field (albeit only after excavation).
- We could utilize a two piece brass/bronze assembly if need be however it is likely a vault for the assembly would be required as opposed to the significantly cheaper standard curb box, and every additional joint is a potential sewage leak.
- The corrosive soils on Kent Island necessitate the use of stainless steel.





March 11, 2016

Queen Anne County MD.,
Re: Environment One Stainless Steel Uni-Lateral Assembly

To Whom It May Concern;

Environment One Corporation (E/One) manufactures Low Pressure Sewer system pumps & components. One of the items we are frequently specified to provide is an all Stainless Steel Uni-Lateral Assembly for use in the low pressure wastewater collection systems. This is because each connection in an LPS system requires a check valve and curb stop to isolate the residential and commercial properties from the low pressure wastewater lines.

E/One's all Stainless Steel Uni-Lateral Assembly combines the curb stop and check valve into a single Uni-Body Assembly which minimizes threaded pipe connections and eliminates commonly used buried plastic curb stops, buried plastic check valves as well as numerous pipe connections associated with buried assemblies. E/One's unilateral saves time and money during the installation process and also minimizes the chances of underground leaks, further saving time and money for the community, ratepayers and taxpayers at large.

Currently this assembly is only available from one of E/One's overseas vendors. It is our understanding that there is no other Manufacturer or Supplier who can supply anything similar. Without a domestic supply a recent customer Falmouth, MA requested and received a waiver from American Iron and Steel (AIS) based on waiver point number 2. which states; "*[the] iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality*".

It should also be noted that the scope of this product may fall under an EPA Decision. Memorandum from Nancy K. Stoner, Acting Assistant Administrator regarding De Minimis Waiver Section 436 of P.L. 113-76, Consolidated Appropriations Act (CCA), 2014. It is our understanding this ruling is still in effect from 2104.

"Funds used for such de minimus incidental components cumulatively may comprise no more than a total of 5 percent of the total cost of the material used in and incorporated into a project; cost for an individual item may not exceed 1 percent of the total cost of the materials used in and incorporated in a project."

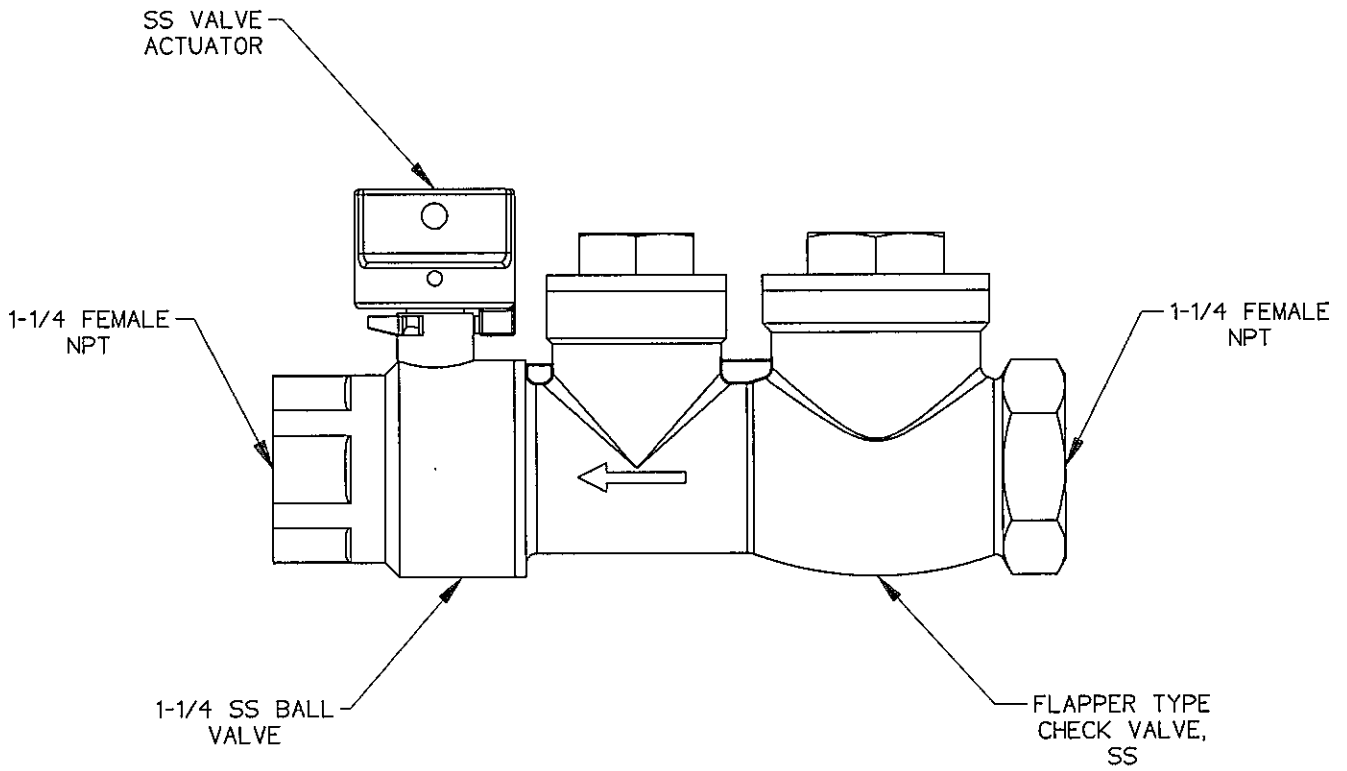
A copy of this memorandum is included with the referenced specifications and product drawings. If you need additional information, please do not hesitate to contact us.

Yours Truly,

Christopher Nedwick
Regional Manager
Environment One Corporation

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.

**STAINLESS STEEL
LATERAL ASSEMBLY
NO FITTINGS**



PART IS A BALL VALVE CURB STOP WITH FEMALE PIPE THREADS,
VALVE POSITION STOPS (OPEN/CLOSED), AND INTEGRAL CHECK VALVE
MATERIAL: STAINLESS STEEL

PRESSURE RATING: 235 PSI

TO ORDER SS LATERAL, NO FITTINGS
USE PART NUMBER NB0184P01

SGS	DN	09/20/11	-	3/16
DR BY	CHK'D	DATE	ISSUE	SCALE



STAINLESS STEEL LATERAL ASSEMBLY
NO FITTINGS

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