



Commissioners of Leonardtown

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DANIEL W. BURRIS
Mayor

LASCHELLE E. MCKAY
Town Administrator

September 12, 2016

Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, MD 21230-1718

Attn: Walid Saffouri, Program Administrator
Engineering and Capital Projects Program

Re: American Iron and Steel (AIS) Waiver Request
Leonardtown WWTP Enhanced Nutrient Removal (ENR) Upgrade
GHD No. 8614875



Dear Mr. Saffouri,

The Town of Leonardtown owns and operates the Leonardtown Wastewater Treatment Plant (WWTP) located in Leonardtown, Maryland. The existing plant is a 0.68 million gallons per day (mgd) facility that currently treats municipal wastewater from the surrounding service area. The plant is currently undergoing an Enhanced Nutrient Removal (ENR) upgrade to meet performance goals for nitrogen and phosphorus as outlined in the Bay Restoration Act and ENR Strategy that was signed into legislation in 2004. Construction for this upgrade project has an expected Substantial Completion date of July 5, 2017.

The Town of Leonardtown has been accepted to receive funding through the State grant and revolving loan programs for the ENR Upgrade. As a result, certain construction materials must be certified under the applicable American Iron and Steel (AIS) requirements in order to be incorporated into the project. Included in these specified products are Straub Flex Couplings, which do not appear to be available in sufficient and reasonably available quantities as AIS-compliant.

Flexible stainless steel couplings for air service are shown in a total of four (4) locations for incorporation into the proposed work. The original Contract Drawings related to this product are shown in Attachment 1, which were superseded by Field Order #1 (Attachment 2) and Work Directive #1 (Attachment 3). Flexible stainless steel couplings were not specified in detail, but instead were called out as "Straub Flex, or equal." The named product and equivalent products from alternate manufacturers (such as Romac Armor Series) are proposed in order to provide the following features:

- Stainless steel construction matches connected piping to minimize corrosion
- High temperature rating for process air service
- Accommodates angular deflection and misalignment for pipe assembly
- Allows pipe gap for axial expansion/compression due to temperature variation
- Coupling design provides convenient disassembly point for maintenance of welded air pipe

The equipment supplier for the project has inquired with several different manufacturers for the specified couplings, and has stated that they were not able to locate an AIS-compliant product that meets the technical requirements. A letter from the supplier with supplemental information is provided under Attachment 4 for documentation.

We submit this waiver request for flexible couplings based on the qualifying criteria that AIS-compliant products are not produced in the United States in sufficient and reasonably available quantities and of satisfactory quality. The following information is provided in accordance with the requirements outlined in the Waiver Request Checklist:

1. Description of the foreign and domestic construction materials
 - a. The project requires Flexible Couplings rated for high temperature air. Each manufacturer contacted took exception to the coupling body, which is sourced globally.
2. Unit of measure
 - a. Per each.
3. Quantity
 - a. This project requires 2 each 10" Flex Couplings and 2 each 8" Flex Couplings.
4. Price
 - a. An AIS-compliant valve could not be located so there is no applicable pricing difference. The total price of the non-AIS compliant offering is \$2,796.80.
5. Time of delivery or availability
 - a. An AIS compliant valve cannot be located so there is no applicable time of delivery or availability. The availability on the non-AIS compliant offering is 2 weeks.
6. Location of the construction project
 - a. The project is located in Saint Mary's County of Southern Maryland at the Leonardtown WWTP. The address is 22620 Van Wert Lane, Leonardtown, MD 20650.
7. Name and address of the proposed supplier
 - a. Fortiline Waterworks, 2305 La Crosse Ave, Richmond, VA 23223
8. A detailed justification for the use of foreign construction materials
 - a. After contacting several manufacturers, they claim they cannot meet AIS requirements. Their reasoning is that they will not produce this material domestically for such a small scope of specialized couplings.

Please also see the attachments to this waiver request for the additional requirements outlined in the waiver request checklist, including the relevant sheets from the project drawings, project field order and work directive, a statement letter from the equipment supplier, and an anticipated project schedule.

Thank you for your consideration, and if you have any questions or if you need additional information please contact me at 301-475-9791 or Laschelle.mckay@verizon.net.

Sincerely,

Commissioners of Leonardtown



Laschelle McKay
Town Administrator

Cc: Jason VerNooy, GHD
John Gesswein, MDE

Attachments: Project Drawing
Project Field Order
Project Work Directive
Statement Letter from Supplier
Anticipated Project Schedule

Transmittal Form

To: MEB General Contractors Inc.
4016 Holland Blvd
Chesapeake, VA 23323

Date: 9/21/15
From: Fortiline Waterworks

Attention: Matt Donhauser
Project#: Leonardtown WWTP ENR
Spec#: No Specification

This letter constitutes a formal request by Fortiline Waterworks for Mideastern Builders to proceed with applying for an American Iron & Steel Act (AIS) waiver for the Straub Flex Couplings specified on drawing 86-14875-M007 for the Leonardtown WWTP project in Leonardtown, MD. Fortiline Waterworks has inquired with several different manufacturers of these Flexible Couplings and none can provide an AIS compliant configuration.

The following information reiterates the information required by the Waiver Request Checklist and our specific response to each item as follow:

General

1. Description of the foreign and domestic construction materials.
 - a. The project requires Flexible Couplings rated for high temperature air. Each manufacturer contacted took exception to the coupling body, which is sourced globally.
2. Unit of measure.
 - a. Per each.
3. Quantity.
 - a. This project requires 2 each 10" Flex Couplings and 2 each 8" Flex Couplings.
4. Price.
 - a. An AIS compliant Flex Coupling cannot be located so there is no pricing difference. The total price of the NON-AIS compliant offering is \$2,796.80.
5. Time of delivery or availability.

- a. An AIS compliant Flex Coupling cannot be located so there is no time of delivery or availability. The availability on the NON-AIS compliant offering is 2 weeks.
6. Location of the construction project.
 - a. The project is located in Saint Mary's County of Southern Maryland on Brenton Bay (a western branch off the Potomac River).
7. Name and address of the proposed supplier.
 - a. Fortiline Waterworks, 2305 La Crosse Ave, Richmond, VA 23223
8. A detailed justification for the use of foreign construction materials.
 - a. After contacting several manufacturers they claim they cannot meet AIS requirements. Their reasoning is that that they will not produce this material domestically for such a small scope of specialized couplings.

This waiver request was submitted to the EPA by the state of Maryland. 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 such as 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.