



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 30 2016

OFFICE OF WATER

DECISION MEMORANDUM

SUBJECT: Project Waiver of American Iron and Steel Requirements to the Sacramento Regional County Sanitation District in California for Expansion Joint Shear Dowels

FROM: Andrew D. Sawyers, Director
Office of Wastewater Management

A handwritten signature in black ink, appearing to read "Andrew D. Sawyers".

The U.S. Environmental Protection Agency is hereby granting a project waiver pursuant to the "American Iron and Steel" requirements of the Clean Water Act Section 608 under the authority of Section 608(c)(2) to the Sacramento Regional County Sanitation District in California for the purchase of expansion joint shear dowels. This waiver permits the use of these shear dowel systems manufactured outside of the United States in the Sanitation District's Echo Water Biological Nutrient Removal project because no domestic manufacturers produce an alternative product that can meet the project's technical specifications. This is a project specific waiver and only applies to the use of the specified products for the proposed project funded by the Clean Water State Revolving Fund. Any other project funded by either the Clean Water or Drinking Water State Revolving Fund that wishes to use the same products must apply for a separate waiver based on the specific project circumstances.

Rationale: According to Section 608 of the Clean Water Act, CWSRF assistance recipients must use specific domestic iron and steel products that are produced in the United States if the project is funded through the SRFs. The EPA has the authority to determine whether it is necessary to waive this requirement based on certain circumstances set forth in Section 608(c)(2) of the Clean Water Act. The provision states that, "[the requirements] shall not apply in any case or category of cases in which the Administrator of the Environmental Protection Agency... finds that - (2) iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality."

The Sacramento Regional County Sanitation District provided information to the Agency claiming there are no manufacturers producing expansion joint shear dowels that meet the project's technical specifications in the United States in sufficient and reasonably available quantities. The Sanitation District plans to install a shear dowel system as part of its Echo Water Biological Nutrient Removal project. This project includes the construction of a battery of eight basins, consisting of concrete floors, walls and elevated slabs. Due to the large size of the structure and groundwater uplift forces, the magnitude of shear transfer through the expansion joints is very large. The design for the structures includes approximately 6,120 shear dowel systems to accommodate the large shear forces. The applicant attempted to find a domestic

manufacturer of the shear dowel systems and researched several manufacturers along with their locations of production, but was unable to find any manufacturers that produced these systems in the United States.

The EPA conducted market research on the supply and availability of shear dowel systems. The Agency concluded that the applicant's claim is supported by available evidence. The Agency conducted research on the manufacturers identified by the applicant and confirmed that none appear to be manufacturing their products in the United States. Additionally, the Agency conducted searches for other potential manufacturers of shear dowel systems, but was unable to identify additional manufacturers.

Since the applicant established a proper basis to specify a particular product required for this project and EPA substantiated the applicant's claim through market research that this product is not available from a manufacturer in the United States, the Sacramento Regional County Sanitation District is hereby granted a waiver from the AIS requirements. This waiver permits the purchase of the specified expansion joint shear dowels documented in the state of California's waiver request submittal on behalf of the applicant dated August 10, 2016.

If you have any questions concerning the contents of this memorandum, please contact Timothy Connor, Chemical Engineer, Water Infrastructure Division, at connor.timothy@epa.gov or (202) 566-1059.