



WATER · MINERAL · ENERGY

January 3, 2016

US Environmental Protection Agency
Office of Wastewater Management
Water Infrastructure Division
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Memorandum in regards to the 30" Casing for Shell Creek Reverse Osmosis
Water Treatment Plant Deep Injection Well Punta Gorda, FL

Dear Mr. Sherman,

Layne was awarded the project to construct both a deep injection well and monitor well for the City of Punta Gorda in July of 2016. It was issued a notice to proceed on 7.18.16. Within this notice was a confirmation that the City desired to use an alternate design option which utilized US iron and steel (see attached). Layne started the contract fully aware of the American Iron and Steel (AIS) requirement and proceeded with its procurement process accordingly.

Layne received the final quote for Pittsburgh pipe on 8.12.2016 (see attached quote). Layne used this vendor for 99 % of the casing in the project and placed the order for this pipe on 8.15.2016. The quote stated domestic pipe for all sizes requested. Furthermore Layne submitted final mill certificates to Tetrattech (engineer of record for the City of Punta Gorda) around 9.27.2016. Shortly after this period the 30" casing was approved for the project.

Layne received the majority of the casing via multiple loads between late September and October of 2016. The casing was verified onsite and approved by all parties involved. In December of 2016 Layne was requested by Tetrattech to provide AIS certification paperwork for each set of casing on site. It was at this time that the issue first came to light. Pittsburgh was able to provide AIS certification paperwork for all the casing in question with the exception of 1860' of 30" (see attached Pittsburgh Pipe AIS certification paperwork). There is over 7,700' of casing that will be used throughout the project. Unfortunately, the 30" casing was made from foreign made slabs that came the United States after the pig iron state. Those steel slabs originated from Russia, United Kingdom, South Korea, and Mexico (see attached mill certificates). Reheating, forming, finishing, rolling, welding, and testing all occurred in the United States at JSW Steel in Baytown, Texas. (see certification paperwork for Pittsburgh Pipe).

WATER RESOURCES

Injection Wells

Ultimately, there was a miscommunication between Pittsburgh Pipe and Layne in regards to the AIS requirement for all casing diameters for the project. This mistake was not caught either by the vendor, contractor, or engineer until 12.28.16. Unfortunately Layne needs this next string of casing for the next phase of construction. It is currently conducting reaming operations and intends on setting approximately 1811' of 30" casing within the next seven to ten days.

Current lead time on a new string of casing that is AIS compliant is about nine to eleven days. This includes sourcing the material, shipping, and then preparing it onsite. Purchasing a new string of casing will undoubtedly impact critical path and potentially result in negative 2nd and 3rd order effects. Leaving open borehole for extended periods of time is typically avoided at all costs and contrary to sound drilling practice. Furthermore, leaving borehole open longer than required will risk further intermingling of underground aquifer resources.

Layne did not maliciously try to avoid purchasing casing that was not AIS compliant. Furthermore, it is Layne's opinion that Pittsburgh Pipe did not maliciously provide product that was not compliant. This is proven by the fact that 99% of the casing to date is already AIS compliant. Furthermore, Layne and Tetrattech immediately contacted both regional and national level EPA contacts once the issue was discovered. It discussed the options with both engineer, client, Gregory Alfsen (SRF project Manager), Stephanie Hammett (EPA Region 4 SRF coordinator) and Eliot Sherman (EPA Water Infrastructure Division). Ultimately there was a breakdown in communication during the procurement process and it was not caught until it was too late. Although sourcing AIS compliant pipe is an option, it would undoubtedly contribute to delay.

After discussions with yourself on January 3rd it was determined that Layne could potentially have grounds to request a public interest waiver. Waiver for the AIS requirement for the 30" casing is necessary to maintain schedule and potentially avoid follow on issues. In an effort to remain both in compliance and ensure the needs of the client; Layne is also pursuing its sourcing avenues. But it would like to request the waiver be granted as this would be the preferred option given the potentially to expedite the approval process. Please let us know should you have any additional questions.

Attachments:

- A: Drawing of Well
- B: 30" mill certs Exhibit B
- C: 30" mill certs Exhibit C
- D: 30" mill certs Exhibit D
- E: Pittsburgh AIS certification Paperwork for 50, 40, 20, 34, 24, 16 casing
- G: Pittsburgh 30" certification paperwork



H: Layne PO for Pittsburgh Pipe
I: Pittsburgh quote for project
J: City of Punta Gorda PO

Respectfully,
Layne Christensen Company



Rob Bongioanni
Project Manager

This waiver request was submitted to the EPA by the state of Florida. 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.