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February 7, 2017

Bridget Stefan
Ohio EPA-NWDO
Division of Drinking and Ground Waters
347 N. Dunbridge Road
Bowling Green, Ohio 43402

Re: Oregon WTP HAB Infrastructure Improvements
Waiver Request from American Iron and Steel Provisions - Grooved Couplings

Dear Ms. Stefan:

The City of Oregon respectfully requests a waiver from the American and Iron Steel (AIS) provisions required by the Drinking Water Revolving Loan Funds (DWRFL) being utilized for this project located at the Oregon Water Treatment Plant is located at 935 N. Curtice Road North, Oregon, Ohio, 43616. The waiver is specifically requested for 8” and 10” Victaulic stainless steel grooved couplings on the air scour piping in the filter pipe gallery.

The waiver is requested on the basis that the couplings are not produced in the United States in sufficient and reasonably available quantities. General and Mechanical Contractor Mosser Construction, Inc. submitted the attached correspondence and supporting documentation including a letter from Victaulic regarding their raw material sources. Victaulic indicates the lead time for globally sourced couplings is 2-3 weeks and the lead time for AIS compliant couplings is 28 weeks.

Mosser’s documentation includes a construction schedule showing grooved couplings are required prior to December 20, 2016. Since there are only 2 days of float for this activity, delaying blower intake piping up to 28 weeks for AIS compliant couplings would cause the project to go significantly beyond the contract substantial completion date of July 31, 2017. Since the proposed improvements will serve as a barrier against cyanotoxins produced by harmful algal blooms in Lake Erie, it is critical the project not be delayed.

We respectfully request your review and approval for the Victaulic globally sourced (non AIS-compliant) stainless steel grooved couplings for this project. The City of Oregon and Mosser feel confident that all other products incorporated into the project will meet AIS requirements.

If you have any questions, please contact me at (419) 698-7043.

Sincerely,

Paul Roman, P.E.
Director of Public Service

attach.

PR:klw

cc: Mr. Doug Wagner, City of Oregon
Mr. Jeffrey J. Swartz, PE -Arcadis U.S., Inc.
Mr. Brian Boberg, PE –Arcadis U.S., Inc.



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