

December 23, 2016

Colorado Department of Public Health & Environment

4300 Cherry Creek Drive South

Denver, CO 80246

Attention: Paul Young

Re: Plum Valley Heights- Subdistrict of Roxborough Water & Sanitation District
American Iron and Steel Waiver Request for Double Check Valve Assemblies

Mr. Young

Roxborough Water & Sanitation District (RWSD) hereby applies for a project waiver pursuant to the "American Iron and Steel" requirements for the purchase and installation of double check valve assemblies for the use in the contract for Plum Valley Heights NWDC Water Project.

According to AIS requirements, SRF assistance recipients are required to use specific domestic iron and steel products that are produced in the United States if the project is funded through and assistance program. However, the recipient may receive a waiver if certain circumstances. In this instance, condition number two "Iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality" is met.

This project requires a total of four (4) double check valve assemblies be installed within the three meter vaults to prevent cross contamination of water being purchased from Centennial Water. The use of backflow prevention (double check valve) is common practice when water passes from one water system (Centennial) to another (Roxborough).

The installation of the meter vaults (including the double check valves in question) is integral in supplying water to the residents in the Chatfield Acres and Chatfield Estates areas. The preferred (and specified) double check valve manufacturer, Watts, has indicated they can not meet the requirements to certify their valves being AIS compliant. In addition, the contractor's supplier contacted additional valve suppliers (listed below), with the same results.

FEBCO large LF850 and LF870 double checks, the body, covers and some internal check components do not meet AIS.

Ames large diameter double checks models C200 and M200 do not meet AIS. Body and some internal components do not meet AIS.

Watts large diameter (2-1/2" to 10") double checks models LF709, 774, 757 and 757N, do not meet the AIS. The body, covers, and some internal components do not meet AIS.

This project requires four (4) double check valves. Watts double check valves are available through HD Supply located at 10000 E 56th Ave. Denver, CO 80239. Double check valves for our project, located in Littleton, CO would arrive two (2) weeks from placing the order.

We have contacted HD Supply and Rep Masters to find suitable double check valves for the project. Rep Masters represents FEBCO, Ames, and Watts double check valves and has informed us which parts are not AIS compliant (listed above). In addition to these three manufacturers, HD Supply also supplies Apollo and Wilkens double check valves, which also have parts that are not AIS compliant. Through our research and theirs, we cannot find double check valves that will meet our schedule and AIS certification.

Based on this information, we are requesting that the Watts double check valves that were specified in the contract documents be allowed for this project.

Regards,



Jimmy Stephens

K.R. Swerdfeger Construction, Inc.

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