

July 21, 2017

Patti Cale-Finnegan
Iowa Department of Natural Resources
502 E. 9th Street
Des Moines, IA 50319-0034

RE: KELLEY WATER SYSTEM CONNECTION TO XENIA RWD
AMERICAN IRON AND STEEL WAIVER REQUEST FOR DOUBLE CHECK
VALVE ASSEMBLIES

Dear Ms. Cale-Finnegan:

On behalf of the City of Kelley, Iowa, this letter is submitted to request a project waiver pursuant to the "American Iron and Steel" requirements for the purchase and installation of double check valve assemblies for use in the City's Water System Connection to Xenia RWD project located in Kelley, Iowa. This project will establish a new and primary water supply for the City of Kelley.

As this project will be funded by a State Revolving Fund loan, the American Iron and Steel (AIS) requirements apply to the project. According to the AIS requirements, recipients may request and receive a waiver to the AIS requirement in certain circumstances. For this project, we hereby request a waiver on the basis that "Iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality," which is condition number two as listed in the EPA's AIS guidance documents.

This project requires two (2) double check valve assemblies which will be installed within the proposed meter pit constructed with this project, at the connection point to the Xenia Rural Water District water system. These double check valve assemblies are required by Xenia Rural Water District and are installed to prevent cross contamination of Xenia's water system. The use of cross contamination control and backflow prevention is common practice when water passes from one water system to another.

The project requirements for the double check valve assemblies include double check valve assemblies for a municipal water supply application, equivalent to a 3" Watts model LF709, with flanged NRS resilient seated gate valves, meeting EPA's American Iron and Steel requirements, NSF 61 certified, and capable of being tested and certified. The specified double check valve assembly manufacturer, Watts, has verified to us that neither their model LF709 double check valve assembly, nor any other equivalent double check valve assemblies they manufacture meet the AIS requirements, due to the valve bodies being cast outside of the United States.

The project contractor for this project is Keller Excavating. The work involving the double check valve assemblies will be completed by Keller Excavating's subcontractor C.L. Carroll Company.

The proposed supplier of the double check valve assemblies is HD Supply Waterworks, located at 2800 SE Gateway Drive, Grimes, IA 50111, phone number 515-986-4000. Please refer to the attached letter from HD Supply confirming the non-availability of the domestic construction materials for which the waiver is sought. As stated in this letter, the proposed materials are currently available for immediate shipping.

The double check valve assemblies will be needed early in the project construction, as the proposed meter pit and water main will need to be placed into operation before the other portions of the project, such as the work on the existing elevated water storage tank and existing water treatment plant, are begun. The project overall construction schedule is as follows:

1. Start meter pit construction – July 2017
2. Meter pit and water main construction – 5 months
3. Complete meter pit and water main – November 2017
4. Start tower and WTP construction – November 2017
5. Tower and WTP construction – 6 months
6. Complete project – May 2018

On the EPA's AIS website (<https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement>), in recent months two other AIS waiver requests have been listed which are substantially the same as this request. These were submitted for projects in Roxborough, Colorado (dated December 23, 2016) and Fort Calhoun, Nebraska (dated April 10, 2017). Research completed for those projects and discussed in those waiver requests is referenced herein as a portion of the justification that there are no double check valve assemblies suitable for this project and equivalent to the ones specified for this project produced in the United States. The brand and model of double check valve assemblies proposed for this project appears to be the same as proposed for the other two waivers discussed above.

During the bid period for this project in April 2017, four of the major local waterworks material suppliers were contacted and asked if they could locate a 3" double check valve assembly meeting AIS requirements. The suppliers contacted included Municipal Supply, HD Supply, Utility Equipment Company, and Brown Supply. Of these suppliers, one responded that they were not able to find any products meeting these requirements, and no response was received from the remaining suppliers. These four suppliers represent numerous waterworks materials manufacturers, and the lack of response is further evidence of the availability of 3" double check valve assemblies meeting AIS requirements.

Research and correspondence were completed in search of alternate manufacturers of 3" double check valve assemblies meeting AIS requirements. Possible alternate manufacturers identified include Ames, Apollo/Conbraco, Cash Acme, Febco, Zurn/Wilkins, Hersey, Cla-Val, and Flomatic, and are discussed below.

Ames – As stated in the Fort Calhoun waiver request, they do not manufacture an AIS compliant double check valve assembly. As stated in the Roxborough waiver request, models C200 and M200 do not meet AIS requirements. No other potentially equivalent models were found.

Apollo/Conbraco – As stated in the Roxborough waiver request, they do not manufacture an AIS compliant double check valve assembly. Also, a NSF website search for NSF 61 certification did not list any equivalent models produced by this manufacturer. HD Supply verified for this project that they do not manufacture an AIS compliant double check valve assembly, as stated in the attached letter.

Cash Acme – The manufacturer stated they only produce backflow preventers for sizes 0.75” and smaller. Therefore this manufacturer does not produce a product meeting the requirements for this project, as a 3” or larger double check valve assembly is required due to the high flow rate.

Febco – As stated in the Fort Calhoun waiver request, they do not manufacture an AIS compliant double check valve assembly. As stated in the Roxborough waiver request, models LF850 and LF870 do not meet AIS requirements. No other potentially equivalent models were found. HD Supply verified for this project that they do not manufacture an AIS compliant double check valve assembly, as stated in the attached letter.

Zurn/Wilkins – As stated in the Fort Calhoun and Roxborough waiver requests, they do not manufacture an AIS compliant double check valve assembly. Also, a NSF website search for NSF 61 certification did not list any equivalent models produced by this manufacturer. HD Supply verified for this project that they do not manufacture an AIS compliant double check valve assembly, as stated in the attached letter.

Hersey – Model E1 was not manufactured after 1978. Model No. 2 was not manufactured after 2004. No other potentially equivalent models were found.

Cla-Val – Model D-4 was not manufactured after 2005. No other potentially equivalent models were found.

Flomatic – Model DCV was not manufactured after 2013. No other potentially equivalent models were found.

Based on the information discussed herein, we are requesting that the Watts model LF709NRS double check valve assemblies specified and proposed for this project be allowed for this project. We request a review and approval of this waiver request in a timely manner due to the need to install the proposed double check valve assemblies in the near future to avoid delaying the overall project schedule. We hope this is possible based on the significant amount of time the two previous very similar waiver requests submitted by Roxborough, Colorado and Fort Calhoun, Nebraska have been under review so far.

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Please let us know of any questions or comments after reviewing this request. Thank you for your consideration in this matter.

Sincerely,

SNYDER & ASSOCIATES, INC.

A handwritten signature in blue ink that reads "Christoffer Pedersen". The signature is written in a cursive style with a large initial 'C'.

Christoffer Pedersen, P.E.
Project Manager

CAP/cap

Enclosure

cc: Jennifer Davies – Kelley City Clerk
Gary Milam – Kelley Public Works Director
Keller Excavating