



**BANGOR WATER DISTRICT**  
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Kathy Moriarty  
General Manager

October 4, 2017

Mr. Larry Girvan, P.E.  
Maine Department of Health and Human Services  
1235 Central Drive  
Presque Isle, ME 04769

**Re: DWSRF #2017-02  
Request for waiver**

Dear Larry,

Bangor Water District (BWD) is requesting a project specific waiver pursuant to “American Iron and Steel” (AIS) section 436 of the “Consolidated Appropriations Act” (Act), dated 2014, for the purchase and installation of one insertion style valve for our Hammond Street and Maine Avenue Water Main Replacement project, located between Interstate-95 and Corporate Drive in Bangor, Maine. Per these requirements, SRF assistance recipients are required to use iron and steel products meeting the requirements of the Act; however, recipients may request a waiver if they meet one or more of three stated conditions. Condition 2 states, “Iron and Steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality...” and is the basis of our request.

Immediately adjacent to this project is approximately 3,000 feet of 16-inch diameter ductile iron water main, which provides potable water to varied customers such as a surgical center, a counseling center, hotels, business offices, restaurants, and Bangor International Airport aircraft storage and servicing facilities. This long section of water main does not have any main line valves installed along its length. The alternatives of coordinating a shutdown or installing a temporary water feed to the installation of an insertion style valve were considered. Coordinating a shutdown to connect this long stretch of existing water main to the newly installed water main would have been difficult and impactful given the varied nature of the customers served. Installing and maintaining a temporary water feed to accommodate a shutdown was found to be cost-prohibitive due to the large footprint of the disrupted area. BWD identified that it would be most cost-effective, and in the public’s best interest, to install an insertion style valve that would allow for installation under pressure so as to avoid disrupting service to this large area with nearly 24-hour water service demands.

BWD is familiar with installation of insertion style valves and has used AIS compliant insertion valves on several other federally funded projects in water main sizes up to twelve inches in diameter. Manufacturers and suppliers, including EZ Valve Advance Valve Technologies, Hydrastop, Team Insert Valve, and Garrison Enterprises, were solicited by BWD and the prime contractor requesting an insertion style valve to be installed on a 16-inch diameter main that would be in compliance with the Act. Results from each contact were the same: a 16-inch insertion style valve (the “EZ” valve) is available from

Advanced Valve Technologies, Inc. (AVT), that is not domestically sourced. The certificate of origin obtained from AVT states that, "...other than the raw castings, which are cast in South Korea..., all components are made in America." Upon completion of this process, it was concluded that the type of valve needed for this project was not produced in the United States in sufficient and reasonably available quantities. This product would not apply for the *de minimus* waiver, as the estimated cost of the components exceeds the allowable percentages of the total project cost. There were no significant lead times associated with acquiring this product that would impact the project schedule.

Based on the above information, BWD is requesting a project specific waiver that would allow one 16-inch insertion style "EZ Valve" to be utilized for this project. Our findings appear to be consistent with circumstances noted in a decision memorandum dated April 13, 2016, regarding a Project Specific Waiver that was granted to Cape May County Municipal Utilities Authority for use of a 24-inch Insertion Valve. Please do not hesitate to contact us should you require any further information. Thank you for your consideration of this request.

Respectfully submitted,



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District Engineer  
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Enc: AVT Certificate of Origin  
AVT EZ Valve Product Sheet  
AVT EZ Valve Specifications

This waiver request was submitted to the EPA by the state of Maine. 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](mailto:SRF_AIS@epa.gov).