

August 24, 2018

United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Subject: DWSRF Program - American Iron and Steel Waiver Request

Greetings:

The Texas Water Development Board (TWDB) is requesting a waiver of the American Iron and Steel (AIS) requirements applicable to the Drinking Water State Revolving Fund (DWSRF) program on behalf of the Greater Texoma Utility Authority (GTUA), on behalf of the City of Sherman, for the Lake Texoma Water Treatment Plant Expansion project. The basis of the waiver request is that “iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.”

GTUA received a commitment from the TWDB, on behalf of the City of Sherman, on November 20, 2014 for planning and design, with subsequent construction commitments on August 26, 2015 and November 17, 2016 from the DWSRF program.

The waiver request includes Double-Disc Swing Check Valves that have 316SS wetted parts and are NSF 61 certified that will be installed at the Lake Texoma Water Treatment Plant, as described further in the attachments. The contractor has contacted seven suppliers for quotes on these valves. None of the suppliers are currently able to provide the valves that meet the AIS requirements and the required NSF approval for use with drinking water. Following notification from the contractor, GTUA contacted the United States Environmental Protection Agency (EPA), for possible available valve manufacturers. EPA was only able to find one manufacturer that may be receiving NSF approval “soon.” The City of Sherman is not able to wait on the NSF approval of this manufacturer, because the valves are critical to the plant construction schedule. Therefore, GTUA is requesting on behalf of the City of Sherman, a waiver from the AIS requirement for Double-Disc Swing Check Valves that have 316SS wetted parts and are NSF 61 certified.

**Our Mission** : **Board Members**

To provide leadership, information, education, and support for planning, financial assistance, and outreach for the conservation and responsible development of water for Texas

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: Jeff Walker, Executive Administrator

We have attached the supporting information received from GTUA that forms the basis of this AIS waiver request.

If you have any specific technical questions on this request, please contact Joseph Koen, P.E., Project Engineer, Northeast Region of the TWDB staff at [Joe.Koen@twdb.texas.gov](mailto:Joe.Koen@twdb.texas.gov) or (512) 936-8169.

We would greatly appreciate your favorable consideration of this request.

Sincerely,



Mark Wyatt  
Director, Program Administration and Reporting  
Water Supply and Infrastructure

#### Attachments

- c. Drew Satterwhite, P.E., General Manager, GTUA  
EPA - Region 6 Staff  
TWDB staff

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



# GREATER TEXOMA UTILITY AUTHORITY

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P.O. Box 13231  
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RE: AIS Waiver Application

To whom this may concern:

I am requesting a waiver on behalf of the Greater Texoma Utility Authority. The project is the Expansion of the City of Sherman Water Treatment Plant ("WTP") located in Sherman, TX. The Plans and Specifications for this project call for a 2-10" and 2-8" Double-Disc Swing Check Valves to be installed at the WTP. The specifications for these valves can be found in Exhibit A. The contractor has contacted all 4 approved valve suppliers and an additional 3 suppliers for quotes on this valve. The contractor provided us with a statement/summary, Exhibit B, which documents the responses from the suppliers. None of the suppliers are currently able to provide this valve with AIS and the required NSF approval for use with drinking water. Following notification from the contractor, Greater Texoma Utility Authority contacted EPA who then consulted with a contractor to do their own research. The EPA contractor's research concluded with the same result. However, EPA's contractor indicated that one manufacturer, Dezurik, believes they will be getting NSF approval on their AIS valve soon, but we are unable to wait on the valve's approval as it is critical to the plant construction schedule. We are also unable to authorize the contract to purchase a non-NSF approved valve as it is against the Federal Drinking Water Standards.

Due to being unable to acquire a valve that fits within the specifications, we are requesting to use Bray, a valve manufacturer.. The 10" valves are [REDACTED] each and the 8" valves are [REDACTED] each. Lead time for valve delivery is 4-6 weeks.

It is our opinion that we, and the contractor, have gone through significant effort to work with suppliers and the EPA in finding a supplier to fit the AIS and NSF requirements for this project. Therefore, we are requesting a waiver from the EPA to move forward with purchasing non-AIS valves for this project.

Regards,



Drew Satterwhite, P.E.

General Manager

Greater Texoma Utility Authority

cc: Joe Koen, P.E., Senior Engineer

**Attachments**

Exhibit A – Contract Specifications

Exhibit B - Statement from Contractor on Availability

Exhibit C – Memorandum from EPA on Availability

Exhibit "A"

## F. Check and Flap Valves:

1. Type V608 Swing Check Valve 2 Inches to 24 Inches:
  - a. AWWA C508, 125-pound flanged ends, cast-iron body, bronze body seat, bronze mounted cast-iron clapper with bronze seat, stainless steel hinge shaft.
  - b. Valves, 2 inches through 12 inches rated 175-pound WWP and 14 inches through 24 inches rated 150-pound WWP. Valves to be fitted with adjustable outside lever and spring. Increasing-pattern body valve may be used where increased outlet piping size is shown.
  - c. Manufacturers and Products:
    - 1) M&H Valve; Style 59, 159, or 259.
    - 2) Mueller Co.; No. A-2600 Series.
2. Type V612: Double-Disc Swing Check Valve 2 Inches through 48 Inches:
  - a. Wafer style, 250-pound ANSI Standard, spring loaded, Type 316 ASTM A351 Grade, CF8M stainless steel body, CF8M stainless steel discs, shafts and springs, and EPDM resilient seats.
  - b. Valves 2 inches through 12 inches rated 200 psi minimum at 100 degree F and valves 14 inches through 48 inches rated 150 psi nonshock working pressure.
  - c. Manufacturers and Products:
    - 1) APCO; Series 9000.
    - 2) Val-Matic; Dual Disc.
    - 3) Crane/Stockham; WG 970.
    - 4) Tyco; Gulf MB Series.
3. Type V625 PVC Check Valve 8 Inches and Smaller:
  - a. Flange swing check constructed from PVC Type I, ASTM D1784 cell Classification 12454. All O-rings shall be Viton. All valves shall have external lever and spring. All valve components shall be replaceable. All valves shall have top-entry access with O-ring sealed drain plug for in-line servicing
4. Type V630 PVC Ball Check Valve 4 Inches and Smaller:
  - a. ASTM D1784, Type I, Grade 1 polyvinyl chloride body, dual union socket weld ends, rated 150 psi at 73 degrees F, and Viton seat and seal.
  - b. Manufacturers and Products:
    - 1) Nibco; Chemtrol Tru Union.
    - 2) ASAHI/America.
    - 3) Spears; True Union.
5. Type V631 CPVC Ball Check Valve 4 Inches and Smaller:
  - a. ASTM D1784 Cell Class 23477B CPVC body, single or dual union socket weld ends, rated 150 psi at 73 degrees F, 110 psi at 140 degrees F, Viton seat and seal.

Exhibit "B"



Project: Lake Texoma Water Treatment Plant

RE: 316SS Swing Check Valves – AIS and NSF Compliant

After researching with multiple check valve suppliers, both manufacturers listed in the specification along with others that were not listed, we have not been able to locate a manufacturer that offers a swing check valve that has 316SS wetted parts, has NSF 61 certification, and is manufactured with AIS compliant material. We are requesting a waiver on these valves to be able to use non-AIS material that is NSF 61 certified.

Below is a list of the manufacturers and their available offering.

Manufacturer	Available in 316SS	NSF61 Compliant	AIS Compliant
Apco	Yes	No	Yes
Valmatic	No	Yes	Yes
Crane	Yes	No	Yes
Gulf	Yes	Yes	No
Champion	Yes	No	No
DFT	Yes	No	Yes
Bray Ritepro	Yes	Yes	No

Scott Sedey  
Project Manager  
H2O Innovation