



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 30 2018

OFFICE OF WATER

**DECISION MEMORANDUM**

**SUBJECT:** Project Waiver of American Iron and Steel Requirements to the Sacramento Regional Water Authority in California for Tilting Disc Check Valves

**FROM:** Andrew D. Sawyers, Director  
Office of Wastewater Management

A handwritten signature in black ink, appearing to read "Andrew D. Sawyers", is written over the "FROM:" line.

The U.S. Environmental Protection Agency is hereby granting a project waiver pursuant to the “American Iron and Steel” requirements of the Clean Water Act Section 608 under the authority of Section 608(c)(2) to the Sacramento Regional Water Authority (SRWA) in California for the purchase of two (2) 54-inch and two (2) 66-inch Short Body, Triple-Offset Tilting Disc Check Valves. This waiver permits the purchase and use of these items manufactured outside of the United States in Sacramento Regional Water Authority’s EchoWater Tertiary Treatment Facility (TTF) project because no domestic manufacturer produces an alternative product that can meet the project’s technical specifications. This is a project specific waiver and only applies to the use of the specified product for the proposed project funded by the Clean Water State Revolving Fund. Any other project funded by either the Clean Water or Drinking Water State Revolving Fund that wishes to use the same product must apply for a separate waiver based on the specific project circumstances.

**Rationale:** According to the AIS requirements, CWSRF and DWSRF 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 an assistance agreement. The agency can determine whether it is necessary to waive this requirement based on certain circumstances set forth in Section 608(c)(2) of the Clean Water Act. The provision states that, “[the requirements] shall not apply in any case or category of cases in which the Administrator of the Environmental Protection Agency...finds that – (2) iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.”

California provided information to the EPA claiming there are no manufacturers producing 54-inch or 66-inch Short Body, Triple-Offset Tilting Disc Check Valves in the United States in sufficient and reasonably available quantities or that can meet the project’s technical specifications. The SRWA requires tilted disc check valves for the EchoWater TTF to handle the large flow of secondary effluent the facility is designed to transfer. According to SRWA, the valves are needed for their large flow area and low head loss characteristics, and to provide significant energy savings over the life of the valve. Short disc movement from full open to full close provides the ability to close very rapidly or very slowly

to avoid contributing to slamming and surges. The short-body design has a proven track record for long term, high performance. The short laying length of this type of valve reduces the size and construction cost of the facility, and is conducive to the congested nature of the Filter Influent Pumping Station (FIPS) piping. The triple-offset design of the specified valves incorporates a higher performance metal seat, and affords the ability and flexibility for converting to an isolation/check valve combination at any time in the future, should the Water Authority choose to do so. The specified valves also include a three-stage controlled closure, using hydraulic dampeners to eliminate excessive pressure surges.

The EPA solicited public comment and conducted market research on the supply and availability of short body, triple offset, tilted disc valves that can meet the project specifications. The Agency was unable to find a domestic manufacturer, concluding that the applicant's claim is supported by available evidence. The Agency contacted five manufacturers of tilted disc valves. None of the manufacturers indicated they can produce tilted disc valves with triple-offset geometry. Ten other manufacturers of triple-offset butterfly valves were contacted to see if they manufactured triple-offset check valves meeting the specifications of the project. No manufacturer that responded can produce the 54-inch and 66-inch Short Body, Triple-Offset Tilting Disc Check Valves.

Since the applicant established a proper basis to specify the particular products required for this project, and EPA substantiated the applicant's claim through market research that these products are not available from a manufacturer in the United States, the Sacramento Regional Water Authority is hereby granted a waiver from the AIS requirements. This waiver permits the purchase and use of the specified short-body, triple-offset, tilted disc valves documented in the state of California waiver request submittal on behalf of the applicant dated February 23, 2018.

If you have any questions concerning the contents of this memorandum, please contact Timothy Connor, Chemical Engineer, Water Infrastructure Division, at [connor.timothy@epa.gov](mailto:connor.timothy@epa.gov) or (202) 566-1059.