

BRECKENRIDGE

February 25, 2019

Randi Johnson-Hufford
Capital Construction Project Manager
Grants and Loans Unit
Colorado Department of Public Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80246

Re:

American Iron and Steel Waiver Request - Compressed Air System Pressure Reducing Valves

Breckenridge Second Water Treatment Plant Project

Dear Mrs. Johnson-Hufford,

In accordance with American Iron and Steel (AIS) requirements detailed in section 436 of P.L. 113-76, Consolidation Appropriations Act, 2014, the Town of Breckenridge requests a project specific waiver for compressed air system pressure reducing valves for the Breckenridge Second Water Plant Project. The specified 1.5"-2" Emerson MR95H or equivalent valves are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.

Attached is a letter from Moltz Construction which details the project specifications, contacted suppliers, and contacted manufacturers. Moltz has concluded that AIS compliant valves which meet project design criteria are not available.

Additionally, HDR Engineering has reviewed the potential AIS compliant valve manufacturers that were returned by the EPA's research contractor. HDR has concluded that the proposed valve manufacturers either do not meet the design requirements or do not meet AIS requirements.

In conclusion, the Town requests a project specific AIS waiver for the specified 1.5"-2" Emerson MR95H compressed air system pressure reducing valves. A total of two (2) valves are currently assumed to be required for the project.

We appreciate your consideration and look forward to assisting in any way that we can.

Sincerely

James Phelps

Town of Breckenridge, Public Works Director

Enclosures: Letter – Moltz AIS Waiver Request, Letter – HDR Alternate Valve Review, Product Information – Emerson MR95 Valves

Manufacturer Email Attachments

cc: L. Lynch - ToB Public Works

M. Cliff - Cliff Owner Rep

Q. Rockwell - Wember Owner Rep

T. Quigley - HDR Project Manager

N. Boger - Moltz Construction



Southern Office 8807 County Road 175 P.O. Box 729 Salida, CO 81201 Phone: 719-539-7319

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Northern Office 975 Merchant Court Windsor, CO 80550 Phone: 970-330-3248

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February 22, 2019

Mr. James Phelps Town of Breckenridge Public Works

Re: Breckenridge, Colorado

Town of Breckenridge 2nd Water Treatment Plant Project

Dear Mr. Phelps,

Moltz Construction would like to request a project specific waiver pursuant to the "American Iron and Steel" (AIS) requirements for the purchase and installation of a specified air service pressure reducing valve for the use at the Breckenridge 2nd Water Treatment Plant Project located in Breckenridge, Colorado.

For this project, we are requesting a waiver pursuant to Condition No.2 "Iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality."

This project requires (2) pressure reducing valves for compressed air service. The function of these valves is to reduce the compressed air pressure from the air compressors to the equipment service header line. This pressure reducing valve is important to get the air pressure down to a useable pressure for all the equipment & tool connections. There are two compressed air systems on this project, each requiring one of these pressure reducing valves directly off the compressed air tank. One at the Raw Water Pump Station, and one at the Main Treatment building. The project specifies these valves as follows:

- Air or Gas Pressure Regulators:
 - o Acceptable manufacturers:
 - Air service:
 - Fisher 64 Series. (This valve is obsolete, but the equivalent valve is the MR95H series)
- Design requirements:
 - o Self-contained, diaphragm operated.
 - Spring loaded.
 - Field adjustable.

- o Size for conditions listed in pressure regulator schedule.
 - Raw Water Pump Station PRV
 - Pressure reduction from 175psi to 75psi
 - Line Size- 2"
 - Main Treatment Building PRV
 - Pressure reduction from 165psi to 120psi
 - Line Size-1.5"

The manufacturer, Fisher (now Emerson), indicated that these valves cannot meet the requirements to certify their valves as being AIS compliant. Also, we have contacted multiple suppliers who can't find a valve that will be an effective substitution for these valves that can also be certified as AIS compliant. The following manufacturers were contacted by our suppliers and/or HDR upon our request for help: Flow-Tek, Spirax Sarco, Emerson, Jordan Valves, and Cashco Valves.

We have been in contact with two different valve suppliers for this project regarding these two valves; Ferguson Waterworks & Ryan Herco Flow Solutions. Both suppliers have not been able to locate a valve that would meet the AIS certification qualifications, and provide the appropriate functionality required of these valves.

Based on the information provided above and the supplemental documentation, we are requesting to supply the specified Fisher valve for both air service pressure reducing valves. If there are any questions in regards to the content of this letter, or a need for additional information, you may contact me at 303-552-6374 or Casey.Seymanski@moltzconstruction.com. Thank you for your review and consideration.

Sincerely,
Moltz Construction

Casey Seymanski, Asst. PM

Cc: Tricia Quigley, HDR
Michael Cliff, Cliff Engineering
Nick Boger, Moltz Construction
Quentin Rockwell, Wember