



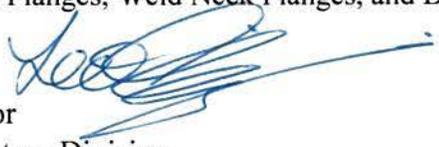
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF WATER

JUN 25 2019

DECISION MEMORANDUM

SUBJECT: Cities of Binghamton-Johnson City, NY AIS Waiver Request for Stainless Steel Blind Flanges, Slip-On Flanges, Weld Neck Flanges, and Butt Weld Reducers – Not Approved

FROM: ^{for} Raffael Stein 
Division Director
Water Infrastructure Division

TO: Timothy Burns, Director, Division of Engineering & Program Management,
NYS Environmental Facilities Corporation

The Clean Water Act includes an “American Iron and Steel” requirement in section 608 that requires Clean Water State Revolving Fund assistance recipients to use iron and steel products that are produced in the United States, or otherwise obtain a waiver. Section 608 also sets forth the circumstances under which EPA may waive the AIS requirement. This memo documents EPA’s response to a waiver request for Stainless Steel Blind Flanges, Slip-On Flanges, Weld Neck Flanges, and Butt Weld Reducers for the Cities of Binghamton-Johnson City, New York.

Background: On April 29, 2019, the state of New York submitted a product waiver request on behalf of the Cities of Binghamton and Johnson City for the use of multiple stainless steel valves and fittings for the methanol feed system in their Joint Sewage Treatment Plant restoration and rehabilitation loan project. The applicant claimed at the time of the waiver submission that stainless steel fusible link valves, fire-safe ball valves, check valves, and compression valves, and stainless steel fittings to include 45 and 90-degree bends, couplings, nipples, union, bushing, adapters, tees, reducers, and flanges were not available in sufficient and reasonably available quantities and of a satisfactory quality to meet the specifications of their project. Further detail includes that the EPA conducted market research on the supply and availability of these stainless steel valves and fittings. The Agency’s market research identified no domestic manufacturers that produce any of the fusible link valves, fire-safe ball valves, check valves, and compression valves. The Agency’s market research identified no domestic manufacturers for any stainless steel fittings, except stainless steel blind flanges, slip-on flanges, weld neck flanges, and butt weld reducers, which are domestically available in sufficient and reasonably available quantities and of a satisfactory quality to meet the specifications of Binghamton-Johnson City project.

Rationale: The EPA was able to identify domestic manufacturers of stainless steel blind flanges, slip on flanges, weld neck flanges, and butt weld reducers in question. Therefore, the EPA is not approving this waiver request for stainless steel blind flanges, slip-on flanges, weld neck flanges, and butt weld reducers. The EPA

provided a list of domestic alternatives and lead times from market research, should it be of assistance to the project in the future.