



State of Oregon Department of Environmental Quality American Iron and Steel Waiver Request

Contact: [Regional Project Officer](#)
503-229-LOAN

Complete this form and submit with a letter detailing the request category and the justifications for the waiver. Submit the letter with signatures on the borrower's official letterhead.

Loan Recipient: _____

Project Name: _____ **Loan Number:** _____

Prior to submitting a waiver request, the borrower has determined the following:

- The American Iron and Steel provision applies to this project, and
- The waiver request items are not included in an existing national waiver

WAIVER REQUEST REQUIREMENTS

The waiver request letter *must* include the following information:

- Description of the foreign and domestic construction materials
- Unit of measure
- Quantity
- Price
- Time of delivery or availability
- Location of the construction project
- Name and address of the proposed supplier
- A detailed justification for the use of foreign construction materials

Provide documentation of a good faith effort to solicit bids for domestic iron and steel products, as demonstrated by language in all of the following items:

- Requests for proposals
- Contracts
- Communications with the prime contractor

Put a check mark next to the category below that corresponds to the reason for the waiver request. Next, put a check mark next to the corresponding justification for that category. Describe the justification in the waiver request letter and include supporting documentation.

Category: Availability Waiver

Waiver request letter includes the following supporting documentation necessary to demonstrate the availability, quantity and/or quality of the materials related to the waiver (*only check those that apply*):

- Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials
- Documentation of the assistance recipient's efforts to find available domestic sources, such as a description of the process for identifying suppliers and a list of contacted suppliers
- Project schedule
- Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials
- Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought

Category: Cost Waiver

Waiver request letter includes the following information (*only check those that apply*):

- Comparison of overall cost of project with domestic iron and steel products to overall cost of project with foreign iron and steel products
- Relevant excerpts from the bid documents used by the contractors to complete the comparison
- Supporting documentation indicating that the contractor made a reasonable survey of the market, such as a description of the process for identifying suppliers and a list of contacted suppliers

Category: Public Interest Waiver

Waiver request letter should detail why the purchase of the domestic iron and steel product is not in the public's interest.

Submit this completed form, the waiver request letter on official letterhead and other supporting documents to your project officer.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us



A neighborly community providing safe services, developing innovative partnerships, focusing on quality and life giving opportunities

September 11, 2019

Bonnie Lamb
Project Officer
Clean Water State Revolving Fund Loan Program
State of Oregon Department of Environmental Quality
475 NE Bellevue Dr., Suite 110
Bend, OR 97701

Re: Project Waiver Request for American Iron and Steel Requirements
City of Irrigon
Septic Conversion – Areas 1 and 2
Irrigon, OR
DEQ Loan # R47742

To whom it may concern:

The City of Irrigon is seeking an availability waiver for the subject project based on the lack of availability for 1-1/4 inch stainless steel lateral valve kits. The lateral valve kits are intended to be installed on pressurized sewer services before connecting to the gravity sanitary sewer main. The valve serves to prevent against backflow and isolate the service if maintenance is required. There are no domestic sources or alternatives for the lateral valves due to their unique design. Research performed by the EPA supports this finding and offers no domestic alternatives for this item.

Project Description

The Septic Conversion project will convert a portion of the City's existing STEP system to a conventional gravity sewer system. The base bid work will require installation of over 10,000 linear feet of gravity sewer main pipe, 37 sanitary sewer manholes, approximately 700 linear feet of 1 ¼-inch forcemain, over 15,000 linear feet of gravity service pipe, approximately 160 sewer service connections, 2 grinder pumps, restoration and other appurtenant work. The five additive bids will require installation of an approximately 1,800 linear feet of gravity sewer main, 9 sanitary sewer manholes, approximately 550 linear feet of 2-inch forcemain, over 2,500 linear feet of 1 ¼-inch forcemain, 31 sewer service connections, approximately 3,500 linear feet of 4-inch sewer service pipe, 13 grinder pumps, restoration and other appurtenant work.

About the Fittings

The conventional gravity sewer system will serve 190 homes throughout the City of Irrigon. Homes that need a grinder pump installed due to existing low elevations, must also have a stainless-steel lateral valve kit installed between the grinder pump and the sanitary sewer main. This valve integrates a check valve, ball valve, and cleanout into one compact module. Due to the unique design of the valve, there are no domestic sources or alternatives for this item.

The City's Engineer for this project, J-U-B ENGINEERS, Inc., identified the lateral valve kits as having the potential to be AIS non-conformant. The Environmental Protection Agency (EPA) was contacted to aid in locating a domestic alternative. As shown in the attached email correspondence, nine companies were contacted and none manufacturer an AIS conformant option.

Waiver Request Details

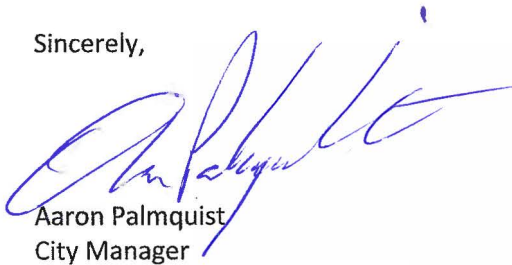
- Description of the foreign and domestic construction materials:
 - Stainless steel
- Unit of measure:
 - Per each
- Quantity:
 - (3) 1-1/4 inch Stainless Steel Lateral Valve Kits (Base Bid)
 - (13) 1-1/4 inch Stainless Steel Lateral Valve Kits (Additive Bids)
- Price:
 - 1-1/4 inch Stainless Steel Lateral Valve Kit - [REDACTED] each (Quoted February 2019)
- Location of the construction project:
 - Irrigon, OR
- Name and address of the proposed supplier:
 - Environment One Corporation (E/One)
2773 Balltown Road
Niskayuna, NY 12309

Attachments

- J-U-B ENGINEERS, Inc. plan sheets and details highlighting lateral valve locations
- EPA email correspondence
- E/One quote, details, and pamphlet

If you should have any questions concerning this evaluation, please contact Lisa Siefken with J-U-B ENGINEERS, Inc. at (509) 783-2144.

Sincerely,



Aaron Palmquist
City Manager
PO Box 428
Irrigon, OR 97844
541-922-3047
manager@ci.irrigon.or.us

Due to Federal Publication Accessibility Requirements, EPA removed figures, diagrams, and project plans from the waiver request submission. If you wish to obtain this additional information for this waiver submission, please contact the AIS staff at CWSRFWaiver@epa.gov.