



Maryland Department of the Environment
1800 Washington Boulevard
Baltimore, Maryland 21230
Attention: Mr. Walid M. Saffouri

NOTE: Pages have been redacted or intentionally excluded by the EPA. Contact SRF_AIS@epa.gov to request more detailed information if needed.

March 20, 2020

To Whom It May Concern:

Request for Waiver of AIS Provisions for Stainless Steel Back Rings for the Improvements to the Headworks and Wet Weather Flow Equalization at the Back River Wastewater Treatment Plant (SC-918H)

This letter is in reference to Sanitary Contract No. SC918H – Improvements to the Headworks and Wet Weather Flow Equalization at the Back River Waste Water Treatment Plant.

Baltimore City Department of Public Works- Office of Engineering and Construction (OEC) is requesting a product-specific project waiver of AIS provision be issued for 8” and larger Stainless Steel Back UP Rings for the construction of the Headworks project at the Back River Wastewater Treatment Plant Project. In accordance with the United States Environmental Protection Agency (USEPA) memorandum, *Implementation of American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act, 2014*, the information required for a waiver to be processed is included below.

Project Background

Hydraulic restrictions within the Back River Waste Water Treatment Plant (BRWWTP) cause backwater conditions in the collection system, and sanitary sewer overflows. Sanitary Contract 918-H is designed to eliminate sewage overflows related to its Consent Decree and to improve the quality of the sewer system and the broader watershed. The Project includes the following principal items of work:

- New Coarse Screen Facility and Influent Pump Station (IPS)



- New Fine Screen Facility
- New Grit Removal Facility
- Two Circular Equalization (EQ) tanks
- Electrical Substations
- Odor Control Facilities
- Modification and Demolition of Existing Facilities

General

The project includes High-Density Polyethylene piping for media conveyance with flange ends for equipment connections. We have not been able to locate a domestic source for the stainless steel backup rings that are required to make these equipment connections. The entire backup flange is cast and machined in a foreign country.

Public Interest

The success of this project, of which this work is a component of, is of significant public interest because this project is part of the City of Baltimore's overall plan to eliminate sanitary sewer overflows (SSOs). The backing rings are needed to properly connect the HDPE pipes to stainless steel pipes and is the industry standard of practice for long term reliability. Since the HDPE pipe will be connected to stainless steel pipe, stainless steel backing rings are necessary as other materials will result in increased corrosion risks from dissimilar metals.

Availability

- Required quantity: The total current project scope of approximately 99 ea. 16" and 32 ea. 14" stainless steel back up rings.
- Efforts to use domestic suppliers: The contractors have conducted an in-depth market and internet search for back up flange manufacturers and have contacted major suppliers via email and telephone. OEC has reviewed and verified the above information.

CITY OF BALTIMORE

BERNARD C. "JACK" YOUNG, Mayor



DEPARTMENT OF PUBLIC WORKS

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If you have any questions or need any additional information, please contact us directly.

Regards,

Mohammed Dohdar
Project Manager

CC: Gurminder Singh
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