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AHMAD ZAHRA



**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

OFFICERS

President  
VICENTE SARMIENTO, ESQ.  
First Vice President  
CATHY GREEN  
Second Vice President  
STEPHEN R. SHELDON  
General Manager  
MICHAEL R. MARKUS, P.E., D.WRE

June 4, 2020

Stephanie White  
Division of Financial Assistance  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

**NOTE: The referenced attachments with project diagrams, schedules, and supplier correspondence are in formats that do not meet the Federal accessibility requirements for publication on the Agency's website. Hence, these exhibits have been omitted from this waiver publication. They are available upon request by emailing SRF\_AIS@epa.gov.**

Re: Waiver Request Letter for AIS compliance – Project number C-06-8290-110

Dear Ms. White:

I hereby request a waiver of six Anti-Cavitation Globe Valves manufactured by [REDACTED] (a non-domestic manufacturer) to be installed at the Groundwater Replenishment System (GWRS) Final Expansion project's construction site located in Fountain Valley, California. These Globe Valves are needed to supplement the existing Globe Valves that have already been installed and used at the GWRS recycled water treatment plant. The approximate cost estimate of these six Globe Valves is [REDACTED]. I have included a justification document from the supplier of Globe Valves, Santa Fe Winwater, for review considerations by the State Water Resources Control Board (SWRCB) and the Environmental Protection Agency (EPA).

Please contact OCWD's SRF Project Director, Mr. Lo Tan, at [ltan@ocwd.com](mailto:ltan@ocwd.com) if you need any additional information on this waiver request. OCWD is looking forward to hearing favorable responses from the SWRCB and the EPA.

Truly yours,

Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE  
General Manager

MRM:LT

Enclosure



10244 Freeman Avenue  
 Santa Fe Springs, CA 90670  
 (562) 777-9724 (562) 777-1084 Fax

April 27, 2020

**Request for Waiver for Non-AIS Component in the OCWD GWRSE Facility**

To: California State Water Resources Control Board  
 PO Box 100 - 1001 I Street  
 Sacramento, CA 95812-0100  
 Attn: AIS Designated Rep – Martin Taylor - Martin.Taylor@waterboards.ca.gov

Project: **Orange County Ground Water Treatment Plant Advanced Water Treatment Facility**

To: Whom it may concern;

Santa Fe Winwater (SFWW) is the supplier responsible for the below listed products for this project.

Santa Fe Winwater is requesting a Non- AIS waiver for the products listed below required on the Orange County Ground Water Treatment Plant Advanced Water Treatment Facility: **The specified valves and configuration are not available in an AIS configuration. Black and Veatch, project Design Engineers, have specified a short laylength, flanged, high performance, linear and balanced anti-cavitation caged guided globe valve. [REDACTED] is what is currently on site for the earlier phase projects and is working well. There are no US manufacturers who build this valve.** As viewed, section 608 (c)(2) of the Clean Water Act appears to be met as iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Non-AIS Mfg - Delivery</i>
15100 2-5	6	8"	Globe Valve	[REDACTED]

SFWW has conducted a thorough online & materials network research exercise to identify possible domestic resources that produce the products to meet the project’s technical provisions and with AIS certification.

Each Manufacturer listed below was contacted by SFWW personnel to request AIS product quotations. SFWW research included the following response data:

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Mfgs. Contacted &amp; Response</i>
15100. 2-5	6	8"	Globe Valve	[REDACTED]
<i>MFG</i>	<i>Date</i>		<i>Response</i>	<i>Reason</i>
[REDACTED]		8"	AIS unavailable	Manufactured outside the US. No US capacity or desire at current to build the valve in the US.

██████		8"	No equal valve	
██████		8"	No equal valve	
██████		8"	AIS unavailable	Does not meet specifications
██████		8"	AIS unavailable	Does not meet specifications
██████		8"	AIS unavailable	Manufactured outside the US
██████		8"	AIS unavailable.	Manufactured outside the US.

SFWW is unable to locate a known source for these products.

Please grant an availability-based project-specific waiver for these items.

Sincerely,



Eddie Na  
Senior Project Manager



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**ORANGE COUNTY WATER DISTRICT**  
ORANGE COUNTY'S GROUNDWATER AUTHORITY

June 4, 2020

Stephanie White  
Division of Financial Assistance  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

Re: Waiver Request Letter for AIS compliance – Project number C-06-8290-110

Dear Ms. White:

I hereby request a waiver of five Triple Offset Butterfly Valves manufactured by [REDACTED] (a non-domestic manufacturer) to be installed at the Groundwater Replenishment System (GWRS) Final Expansion project's construction site located in Fountain Valley, California. These Butterfly Valves are needed to supplement the existing Butterfly Valves that have already been installed and used at the GWRS recycled water treatment plant. The approximate cost estimate of these five Butterfly Valves is [REDACTED]. I have included a justification document from the supplier of Butterfly Valves, Santa Fe Winwater, for review considerations by the State Water Resources Control Board (SWRCB) and the Environmental Protection Agency (EPA).

Please contact OCWD SRF Project Director, Mr. Lo Tan, at [ltan@ocwd.com](mailto:ltan@ocwd.com) if you need any additional information on this waiver request. OCWD is looking forward to hearing favorable responses from the SWRCB and the EPA.

Truly yours,

Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE  
General Manager

MRM:LT

Enclosure



10244 Freeman Avenue  
Santa Fe Springs, CA 90670  
(562) 777-9724 (562) 777-1084 Fax

April 27, 2020

**Request for Waiver for Non-AIS Component in the OCWD GWRSFE Facility**

To: California State Water Resources Control Board  
PO Box 100 - 1001 I Street  
Sacramento, CA 95812-0100  
Attn: AIS Designated Rep – Martin Taylor - Martin.Taylor@waterboards.ca.gov

Project: **Orange County Ground Water Treatment Plant Advanced Water Treatment Facility**

To: Whom it may concern;

Santa Fe Winwater (SFWW) is the supplier responsible for the below listed products for this project.

Santa Fe Winwater is requesting a Non- AIS waiver for the products listed below required on the Orange County Ground Water Treatment Plant Advanced Water Treatment Facility:

**Per the Owner, OCWD and the Project Design Engineer, Black and Veatch, the project specification requires the system matching of 1 additional pump, piping and valve to the existing 5-30” pump legs at an onsite pump station. The existing valves on previous project phases are performing well. The previous and current specification require hardened replaceable Stellite Grade 21 Seats, which are neither available in an AIS specified configuration nor within a timely delivery if a custom Triple Offset Butterfly valve could be made.** As such, condition (2) is viewed as met as, iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.

It is requested that 5 [REDACTED] triple offset butterfly valves with hardened Stellite seats be granted an AIS exemption.

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Non-AIS Mfg - Delivery</i>
15092 2-106 & 2-107	5	8”-30”	Triple Offset Butterfly Valve	[REDACTED]

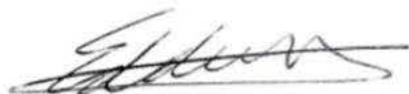
SFWW has conducted a thorough online & materials network research exercise to identify possible domestic resources that produce the products to meet the project’s technical provisions and with AIS certification.

Each Manufacturer listed below was contacted by SFWW personnel to request AIS product quotations. SFWW research included the following response data:

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Mfgs. Contacted &amp; Response</i>
15092 2-106 & 2-107	5	8"-30"	Triple Offset Butterfly Valve	[REDACTED]
<i>MFG</i>	<i>Date</i>		<i>Response</i>	<i>Reason</i>
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not make Triple Offsets
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not make Triple Offsets
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not make Triple Offsets
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not meet specification, lead times or AIS.
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not meet specification, lead times or AIS
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not meet seat specification or lead times.
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not meet specification, lead times or AIS
[REDACTED]		8"-30"	AIS unavailable in those sizes	Do not meet specification, lead times or AIS

SFWW is unable to locate a known source for these products.  
Please grant an availability-based project-specific waiver for these items.

Sincerely,



Eddie Na  
Senior Project Manager

DIRECTORS

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June 4, 2020

Stephanie White  
Division of Financial Assistance  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

Re: Waiver Request Letter for AIS compliance – Project number C-06-8290-110

Dear Ms. White:

I hereby request a waiver of two Chemically-Resistant PTFE Lined Ball Check Valves manufactured by [REDACTED] (a non-domestic manufacturer) to be installed at the Groundwater Replenishment System (GWRS) Final Expansion project's construction site located in Fountain Valley, California. These Ball Check Valves are needed to supplement the existing Ball Check Valves that have already been installed and used at the GWRS recycled water treatment plant. The approximate cost estimate of these two Ball Check Valves is [REDACTED]. I have included a justification document from the supplier of Ball Check Valves, Santa Fe Winwater, for review considerations by the State Water Resources Control Board (SWRCB) and the Environmental Protection Agency (EPA).

Please contact OCWD SRF Project Director, Mr. Lo Tan, at [ltan@ocwd.com](mailto:ltan@ocwd.com) if you need any additional information on this waiver request. OCWD is looking forward to hearing favorable responses from the SWRCB and the EPA.

Truly yours,

Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE  
General Manager

MRM:LT

Enclosure



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 Santa Fe Springs, CA 90670  
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April 27, 2020

**Request for Waiver for Non-AIS Component in the OCWD GWRSFE Facility**

To: California State Water Resources Control Board  
 PO Box 100 - 1001 I Street  
 Sacramento, CA 95812-0100  
 Attn: AIS Designated Rep – Martin Taylor - Martin.Taylor@waterboards.ca.gov

Project: **Orange County Ground Water Treatment Plant Advanced Water Treatment Facility**

To: Whom it may concern;

Santa Fe Winwater (SFWW) is the supplier responsible for the below listed products for this project.

Santa Fe Winwater is requesting an AIS waiver for the products listed below required on the Orange County Ground Water Treatment Plant Advanced Water Treatment Facility: **The specified valves and configuration are not available in an AIS configuration. Black and Veatch, project Design Engineers, have specified an Industrial Teflon lined ball valve for sulfuric acid service. There are no known US manufacturers who build this valve.** As such, per meeting condition (2) of the American Iron and Steel Act; iron and steel products are not produced in the United States in sufficient quantities and are not reasonably available in any quantity of a satisfactory quality (for a sulfuric acid handling check valve). The [REDACTED] are project specified and are requested to be granted an AIS waiver.

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Non-AIS Mfg - Delivery</i>
15093.2-1.18	2 + 2	3", 4"	PTFE lined Ball Check	[REDACTED]

SFWW has conducted a thorough online & materials network research exercise to identify possible domestic resources that produce the products to meet the project's technical provisions and with AIS certification.

Each Manufacturer listed below was contacted by SFWW personnel to request AIS product quotations. SFWW research included the following response data:

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Mfgs. Contacted &amp; Response</i>
15093.2-1.18	4	3", 4"	PTEF lined Ball Check	No AIS Compliant valve found
<i>MFG</i>	<i>Date</i>		<i>Response</i>	<i>Reason</i>
			AIS unavailable	Manufactured outside the US. No US capacity or desire at

[REDACTED]		3", 4"		current to build the valve in the US.
[REDACTED]		3", 4"	AIS unavailable	Manufactured outside the US. No US capacity or desire at current to build the valve in the US.
[REDACTED]		3", 4"	AIS unavailable	Manufactured outside the US. No US capacity or desire at current to build the valve in the US.
[REDACTED]		3", 4"	AIS unavailable	Does not meet specifications
[REDACTED]		3", 4"	AIS unavailable	Does not meet specifications

SFWW is unable to locate a known source for these products.  
Please grant an availability-based project-specific waiver for these items.

Sincerely,



Eddie Na  
Senior Product Manager

DIRECTORS

DENIS R. BILODEAU, P.E.  
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June 4, 2020

Stephanie White  
Division of Financial Assistance  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, CA 95814

Re: Waiver Request Letter for AIS compliance – Project number C-06-8290-110

Dear Ms. White:

I hereby request a waiver of two 316 Stainless Steel Swing Check Valves manufactured by [REDACTED] (a non-domestic manufacturer) to be installed at the Groundwater Replenishment System (GWRS) Final Expansion project's construction site located in Fountain Valley, California. These Swing Check Valves are needed to supplement the existing Swing Check Valves that have already been installed and used at the GWRS recycled water treatment plant. The approximate cost estimate of these two Swing Check Valves is [REDACTED]. I have included a justification document from the supplier of Swing Check Valves, Santa Fe Winwater, for review considerations by the State Water Resources Control Board (SWRCB) and the Environmental Protection Agency (EPA).

Please contact OCWD SRF Project Director, Mr. Lo Tan, at [ltan@ocwd.com](mailto:ltan@ocwd.com) if you need any additional information on this waiver request. OCWD is looking forward to hearing favorable responses from the SWRCB and the EPA.

Truly yours,

Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE  
General Manager

MRM:LT

Enclosure



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April 27, 2020

**Request for Waiver for Non-AIS Component in the OCWD GWRSFE Facility**

To: California State Water Resources Control Board  
 PO Box 100 - 1001 I Street  
 Sacramento, CA 95812-0100  
 Attn: AIS Designated Rep – Martin Taylor - Martin.Taylor@waterboards.ca.gov

Project: **Orange County Ground Water Treatment Plant Advanced Water Treatment Facility**

To: Whom it may concern;

Santa Fe Winwater (SFWW) is the supplier responsible for the below listed products for this project.

Santa Fe Winwater is requesting a Non- AIS waiver for the products listed below required on the Orange County Ground Water Treatment Plant Advanced Water Treatment Facility: **The specified valves and configuration are not available in an AIS configuration. Black and Veatch, project Design Engineers, have specified a small Industrial stainless-steel threaded swing check valve. There are few swing check valve manufacturers in a small 1.5” size. They are lower cost and lower demand. A US manufacturer cannot be found meeting the specifications.** In review, condition 608(c) (2) of Clean Water Act is viewed to be met as iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Non-AIS Mfg - Delivery</i>
15104MF 2-3.F	2	1.5”	316 SS Swing Check Valve- threaded	[REDACTED]

SFWW has conducted a thorough online & materials network research exercise to identify possible domestic resources that produce the products to meet the project’s technical provisions and with AIS certification.

Each Manufacturer listed below was contacted by SFWW personnel to request AIS product quotations. SFWW research included the following response data:

<i>Spec. #</i>	<i>Qty</i>	<i>Size</i>	<i>Product Description</i>	<i>Mfgs. Contacted &amp; Response</i>
15104MF 2-3.F	2	1.5”	316 SS Swing Check Valve	[REDACTED]
<i>MFG</i>	<i>Date</i>		<i>Response</i>	<i>Reason</i>
[REDACTED]		1.5”	AIS unavailable	Manufactured outside the US. No US capacity or desire at

				current to build the valve in the US.
██████		1.5"	No equal valve	
██████		1.5"	No equal valve	
██████		1.5"	AIS unavailable	Does not meet specifications
██████		1.5"	AIS unavailable	Does not meet specifications
██████		1.5"	AIS unavailable	Manufactured outside the US
██████		1.5"	AIS unavailable.	Manufactured outside the US.
██████		1.5"	No equal valve	Does not meet specifications

SFWW is unable to locate a known source for these products.

Please grant an availability-based project-specific waiver for these items.



Sincerely,  
Eddie Na  
Senior Project Manager