



MT 36115
OR 68403
ID RCE-1066
ID 12164-U-1, 2, 3
WA RECORSO33QK
NV 67472 & 74179

May 26, 2020

Water Quality Division
Kevin McNeill
1410 N Hilton
Boise, ID 83706

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: City of Blackfoot WWTP – Bingham County, Idaho – Loan No. WW1703
American Iron and Steel waiver request for Small Diameter pipe fittings.

Dear Mr. McNeill,

On behalf of the City of Blackfoot, Idaho, this letter is submitted to request a project waiver pursuant to the "American Iron and Steel" requirements for the purchase and installation of ½-inch to 2-inch diameter 150# Stainless-steel pipe and fittings use in the City's Waste Water Treatment Plant. This project portion will establish a new and primary Air scour process supply for the UV building at the City of Blackfoot Waste Water Treatment Plant.

Project Background

As this project will be funded by a State Revolving Fund loan, the American Iron and Steel (AIS) requirements apply to the project. According to the AIS requirements, recipients may request and receive a waiver to the AIS requirement in certain circumstances. For this project, we hereby request a waiver on the basis that "Iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality," which is condition number two as listed in the EPA's AIS guidance documents.

This project requires small-bore stainless-steel SCH40 pipe and fittings on the following system: Air scour cleaning. Air scour is used to clean the lamp sleeves to lessen algae buildup. Air will be supplied by the UV Blower (equipment tag UV-B-910).

General

Discussions with possible manufacturers and suppliers for the ½-inch to 2-inch diameter stainless steel pipe fittings suppliers have indicated that none are able to meet both the project specifications and the AIS provisions. It is believed that these products are not produced in the U.S. in sufficient and reasonably available quantities and of satisfactory quality to meet the needs of the project.

The project contractor for this project is RSCI – Record Steel and Construction Inc. The work involving the Air scour stainless steel piping and fittings will be completed by RSCI.

The project stainless steel piping specifications are attached along with the RSCI/Supplier email correspondence.

Availability Waiver Request

The General Contractor RSCI worked with Ferguson(Supplier) who contacted the following manufacturers about the availability of the specified pipe.



MT 36115
OR 68403
ID RCE-1066
ID 12164-U-1, 2, 3
WA RECORSO33QK
NV 67472 & 74179

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

*All 4 of these manufacturers have told us they are not aware of AIS SS threaded fittings.

None of the manufacturers contacted could domestically source the stainless-steel SCH40 threaded fittings in accordance with the contract requirements. Refer to Attachment No. 5, the email correspondence from Matt Sisson(Ferguson), which contains the list of manufacturers contacted and their responses.

On the EPA's AIS website (<https://www.epa.gov/cwsrf/state-revolving-fund-american-iron-and-steel-ais-requirement>), in the recent months two other AIS waiver requests have been listed which are substantially the same as this request. These were submitted for the projects in City of Los Angeles, California (dated April 17, 2020), City of San Diego, California (dated May 14, 2020).

Please let us know of any questions or comments after reviewing this request. Thank you for your consideration in this matter.

Attachments:

- No.1 – “11600 2.14 Air Scour Cleaning” & “15060 2.8 Stainless steel pipe and fittings”.
No.2 – Ferguson/RSCI email correspondence and fittings quotation.

Best Regards,