

August 19, 2020

Mr. Martin Taylor
Davis-Bacon Compliance
AIS Liaison
Loan & Grant Administration Section
Division of Financial Assistance
State Water Resources Control Board
1001 "I" Street, 16th 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 CWSRFWaiver@epa.gov.

RE: San Francisco Public Utilities Commission

SRF Project: CWSRF No. 8286-110 (SFPUC Project No. WW-628-03)
Southeast Water Pollution Control Plant SEP 020 Headworks Project

Subject: AIS Availability Waiver Application for TR Flex Fittings

Dear Mr. Taylor:

The purpose of this application is to obtain an AIS availability waiver for the specified 6 inch, 8 inch and 20 inch diameter TR Flex ductile iron pipe (DIP) fittings. These fittings are not produced within the United States (ref exhibit A). The objective of the project is to furnish and install high-pressure fire protection water lines and utility water lines to serve the critical SEP 020 Headworks Project at the City's Southeast Water Pollution Control Plant. Work also includes replacement of the Headworks Facility. Our application will generally follow the Information Checklist for Waiver Request form in appendix A:

General:

1. Description:
 - a. 6-inch, 8-inch and 20-inch diameter TR Flex DIP fittings, See attached Exhibit 'A' from U.S. Pipe for further description.

London N. Breed
Mayor

Ann Moller Caen
President

Francesca Vietor
Vice President

Anson Moran
Commissioner

Sophie Maxwell
Commissioner

Tim Paulson
Commissioner

Harlan L. Kelly, Jr.
General Manager



2. Unit of Measure/Quantity/Pricing:

4" DIP (TR-Flex)	tee	reducer	22.5	45	90
Measure	EA	EA	EA	EA	EA
Quantity			-		4
\$/EA					█
6" DIP (TR-Flex)	tee	reducer	22.5	45	90
Measure	EA	EA	EA	EA	EA
Quantity			-	1	6
\$/EA				█	█
8" DIP (TR-Flex)	tee	Reducer 8x6	22.5	45	90
Measure	EA	EA	EA	EA	EA
Quantity	2	2	-		6
\$/EA	█	█			█
20" DIP (TR-Flex)	tee	wye	22.5	45	90
Measure	EA	EA	EA	EA	EA
Quantity	-		2		5
\$/EA			█		█

3. Time of Delivery or Availability:

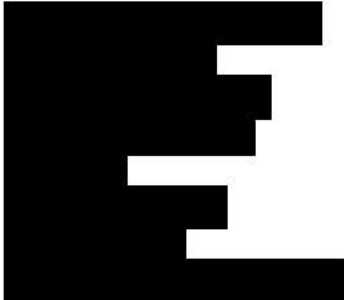
- a. 6 weeks for waiver approval, plus 4-8 weeks delivery; Total ETA 10-14 weeks.

4. Location of Construction Project:

- a. The project is located in the southeast side of the City of San Francisco at 750 Phelps Street, San Francisco, CA.

5. Name and Address of Proposed Supplier:

- a. 

- b. 

c. [REDACTED]

6. Supporting documentation including 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.
 - a. The project engineer has contacted three major ductile iron pipe suppliers requesting the availability of the type and quantity of ductile iron pipe fittings required for the project.
7. Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials:
 - a. See attached Exhibit A
8. Contractor and/or supplier to provide a statement confirming the non-availability of the domestic construction material which is sought:
 - a. See attached Exhibit A
9. Has the State received other waiver requests for the materials described in the request for comparable projects?
 - a. We have attached three approved availability waivers for the TR Flex product. Please reference Exhibits B, C, and D.
10. Project Schedule:
 - a. The affected project engineer's estimate is approximately [REDACTED] with the project's completion date currently of 2/2024. Time is of the essence on the procurement of these fittings as there are time constraints in which the contractor can construct certain portions of the project.
11. Engineering Discussion Re: TR Flex:
 - a. The standard for pipe used in the City's buried utility water distribution system and fire protection water supply system is ductile iron pipe/fittings with TR-Flex joints.
 - b. The Agency acknowledges that there are other methods of

restraining pipe joints that use products other than the TR Flex push on fittings. However, the design engineer is following the City standard in the use of TR Flex fittings. Should the project use other restraining methods, the new system would not be compatible with the rest of the plant piping system for utility water and fire protection, and would be susceptible to corrosion damage. In addition, requiring the applicant to use other methods of restraining pipe joints would result in significant redesign of the project, which in turn would cause delays in the project construction.

- c. The buried piping on this project was designed to allow maximum deflection at the joints to accommodate differential settlement. TR Flex joints provide adequate allowable deflections in addition to offering restraint at the joint. Unrestrained mechanical joints offer similar allowable deflections to TR flex, but restraining a mechanical joint limits its allowable deflection. TR Flex's unique design provides restraint (to prevent lateral movement of the piping system) without sacrificing deflection. Substituting restrained mechanical joint fittings would introduce a significant redesign, would be significantly more expensive, and cause a significant delay in the project schedule.

Sincerely,

Jim Wang
SFPUC - Construction Management
Bureau 525 Golden Gate Ave, 6th
Floor
San Francisco, CA
94102
jwang@sfgwater.org



Enclosure:

- Exhibit A – Supporting documentation including correspondence between Contractor, supplier and various manufacturers.
- Exhibit B – EPA Decision Memorandum Approving TR Flex fittings for the West County Wastewater District (June 13th, 2016)
- Exhibit C – EPA Decision Memorandum Approving TR Flex fittings for the Winston-Salem and Forsyth Country City/County Utilities Commission (August 6th, 2015)
- Exhibit D – EPA Decision Memorandum Approving TR Flex fittings for the City of Belton, MO (August 6th, 2015)