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Maryland Department of the Environment (MDE)
Engineering & Capital Projects Program
1800 Washington Blvd.
Baltimore, MD 21230

December 14, 2020

Attn: Walid M. Saffouri, P.E.
Program Administrator

Re: Washington Suburban Sanitary Commission (WSSC)
Piscataway Bio-Energy Project, Contract No. CD5901B15
American Iron and Steel Requirements (CWA Section 608): Waiver Request for Seamless Stainless Steel Piping

Dear Mr. Saffouri:

This letter is offered to request a waiver from the above referenced American Iron and Steel (AIS) requirements, as promulgated in the Clean Water Act (CWA) Section 608, for seamless stainless steel piping. The waiver is requested since the specified seamless stainless steel piping required for the Piscataway Bio-Energy Project (Project) is not sourced nor manufactured domestically. Thus, this waiver request is an "Availability Waiver Request".

Please find attached a package of information provided by PC Construction that documents the basis for the waiver request. Recall that PC Construction is under contract with WSSC to design, construct, commission, and start-up the Project and is responsible for procuring the materials required for the Project.

The package of information, as requested by EPA to support the waiver request, includes:

- A description of the foreign construction materials.
- Unit of measure.
- Quantity.
- Availability.
- Location of the construction project.

- Name and address of the proposed supplier.
- Documentation of the assistance recipient's efforts to find available domestic sources.
- Waiver request including a statement from the prime contractor and supplier confirming the non-availability of the construction materials for which the waiver is sought.
- Waiver granted for like materials for the City of Raleigh, North Carolina: Neuse River Resource Recovery Facility Bio-Energy Recovery Project

Thank you again for your continued support on this very important, large, and complicated project and for your consideration of this waiver request. Should you have any questions or concerns or need additional information, please do not hesitate to contact the undersigned at (301) 206-8881 or email Stanley.Dabek@wsscwater.com.

Very truly yours,



Stanley Dabek, PE, Project Manager
Washington Suburban Sanitary Commission

Attachment: PC Construction AIS Waiver Request

Cc: E. Dietz – MDE
J. Gesswein – MDE
M. Brackett - WSSC
T. Grojean - WSSC
B. Balchunas – HDR
T. Whetham - BC



PC Construction
21 West Farmington Rd
Accokeek, MD 20607
ATTN: Damon Hand
Re: AIS Deviation Letter – Stainless Steel Seamless Pipe

Mr. Hand,

This letter serves as a request, on behalf of SAC Incorporated, to obtain an American Iron and Steel (AIS) Availability Waiver for the specified 316 Stainless Steel Seamless piping required to complete the Piscataway WRRF Bio-Energy Phase 2 project. This request is made on the basis that the specified Stainless Steel Seamless piping is not produced in the United States. The piping must meet the conditions presented in specification section 15008-08D, however the metal needed for the piping is not melted in the United States.

Availability of ERW Stainless Steel Seamless piping meeting AIS requirements and the project specifications section 15008-08B.

General:

1. Description: The systems that require the seamless stainless steel piping are the DRS and THS systems.
2. Quantities of piping:
 - a. DRS Piping:
 - i. 60 LF of 3" SCH 40S SST Piping
 - b. THS Piping:
 - i. 110 LF of 4" SCH 40S SST piping
 - ii. 1100 LF of 5" SCH 40S SST piping
3. Time of Delivery or Availability:
 - a. Pending waiver approval, ERW or Seamed piping is available stock off the shelf. Piping has been located and held pending approval of this waiver.
4. Location of Project:
 - a. 21 West Farmington Rd
Accokeek, MD 20607
5. Supporting documentation including that SAC has made a reasonable attempt requesting the availability and compliance of the type and quantity of stainless steel piping required for the project.
 - a. Letters from suppliers - See exhibit A.
 - b. SAC RFI to change material – See exhibit B.

SAC EAST

135 Tallcott Road
Williston, VT 05495
(802) 448-5700

SAC FABRICATION

3150 West Haun Dr (8600 S)
West Jordan, UT 84088
(385) 275-2500

SAC WEST

1100 W Town and Country Rd
STE 1250, Office 1247
Orange, CA 92505
(951) 823-8840



Piscataway WRRF Bio-Energy Phase 2
November 9, 2020
AIS Deviation Letter

- c. Engineer of Record allowable change from seamless piping to ERW – ‘as welded’ for CCK line – See exhibit C.
- 6. Project Schedule:
 - a. Piping for the above mentioned piping is due to be delivered to the site by March 31, 2021. Time is of the essence on the approval of this waiver as there are time constraints to submittal approval, procurement, fabrication, and delivery of materials to the site and maintain project schedule.

Please contact me if additional information is required.

Thanks,

Todd Pollick
Project Manager
tpollick@sacincorporated.com
(843) 789-0575

www.SACIncorporated.com

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PROPOSED SPECIFICATION

SECTION 15200-08B TYPE 316 STAINLESS STEEL PIPE AND FITTINGS—GENERAL SERVICE		
Item	Size	Description
Pipe	2-1/2" & smaller 3" thru 6" 8" & larger	Schedule 40S: ASTM A312/A312M, Type 316 seamless, pickled and passivated. Schedule 10S: ASTM A778, "as-welded" grade, Type 316L, pickled and passivated. Schedule 5S: ASTM A778, "as-welded" grade, Type 316L, pickled and passivated.
Tubing	All	ASTM A269, Type 316 stainless steel, seamless, fully annealed hydraulic tubing, 0.065-inch wall thickness minimum.
Joints	1-1/2" & smaller 2" & larger	Threaded or flanged at equipment as required or shown. Butt-welded or flanged at valves and equipment.
Tubing Joints	All	Flareless compression fitting.
Fittings	1-1/2" & smaller 2" & 2-1/2" 3" & larger	Threaded: Forged 1,000 CWP minimum, ASTM A182/A182M, Grade F316 or cast Class 150, ASTM A351/A351M, Grade CF8M/316. Butt Welded: ASTM A403/A403M, Grade WP316L conforming to ASME B16.9 and MSS SP 43, annealed, pickled and passivated; fitting wall thickness to match adjoining pipe; long radius elbows, unless shown otherwise. Butt-Welded: ASTM A774/A774M Grade 316L conforming to MSS SP 43, "as-welded" grade, pickled and passivated; fitting wall thickness to match adjoining pipe; long radius elbows, 5D sweeps for cake service, unless shown otherwise.
Tubing Fittings	All	Flareless Compression Type Forged: ASTM A182/A182M, Grade F316, Parker-Hannifin Ferulok, Flodar BA Series.
Branch Connections	1-1/2" & smaller 2" & larger	Tee or reducing tee in conformance with fittings above. Butt-welding tee or reducing tee in accordance with fittings above.
Tubing Branch Connections	All	Compression type tees or reducing tees in accordance with Tubing Fittings above.

PROPOSED SPECIFICATION

SECTION 15200-08B TYPE 316 STAINLESS STEEL PIPE AND FITTINGS—GENERAL SERVICE		
Item	Size	Description
Flanges	All	<p>Forged Stainless Steel: ASTM A182/A182M, Grade F316L, ASME B16.5 Class 150 or Class 300, slip-on weld neck or raised face.</p> <p>Cast Carbon Steel: ASTM A216/A216M Grade WCA, drilled, ASME B16.5 Class 150 or Class 300 Van Stone Type with stainless steel stub ends, ASTM A240 Type 316L “as-welded grade”, conforming to MSS SP 43, wall thickness same as pipe.</p> <p>Blind Flanges, exposed to the atmosphere and not buried nor immersed in liquid, may be either stainless steel or Class 125 ductile iron or Class 150 carbon steel with gaskets as specified herein.</p>
Unions	2" & smaller	Threaded Forged: ASTM A182/A182M, Grade F316, 2,000-pound or 3,000-pound WOG, integral ground seats, AAR design meeting the requirements of ASME B16.11, bore to match pipe.
Bolting	All	<p>Forged Flanges: Type 316 stainless steel, ASTM A320/A320M Grade B8M hex head bolts and ASTM A194/A194M Grade 8M hex head nuts.</p> <p>Van Stone Flanges: Carbon steel ASTM A307 Grade B hex head bolts and ASTM A563 Grade A hex head nuts. Provide same on mating cast iron flange on valve or equipment with flat ring gasket.</p> <p>Flanged Joints in Sumps, Wet Wells, and Submerged and Wetted Installations: Type 316 stainless steel, ASTM A320/A320M, Grade B8M hex head bolts and ASTM A194/A194M, Grade 8M hex nuts.</p>
Gaskets	All Flanges	<p>Flanged, Water and Sewage Service: 1/8 inch thick, unless otherwise specified, red rubber (SBR), hardness 80 (Shore A), rated to 200 degrees F, conforming to ASME B16.21, AWWA C207, and ASTM D1330, Grade 1 and Grade 2.</p> <p>Gaskets for sulfuric acid service shall be PTFE only.</p> <p>Blind flanges shall be gasketed covering entire inside face with gasket cemented to blind flange.</p>
Thread Lubricant	2" & smaller	General Service: 100% virgin PTFE Teflon tape.

END OF SECTION

SPECIFICATION TO BE DEVAITED FROM

SECTION 15200-08D TYPE 316 STAINLESS STEEL PIPE AND FITTINGS—SLUDGE & CAKE SERVICE		
Item	Size	Description
Pipe	All	Schedule 40S: ASTM A312/A312M, Type 316 seamless, pickled and passivated.
Tubing	All	ASTM A269, Type 316 stainless steel, seamless, fully annealed hydraulic tubing, 0.065-inch wall thickness minimum.
Joints	1-1/2" & smaller	Threaded or flanged at equipment as required or shown.
	2" & larger	Butt-welded or flanged at valves and equipment.
Tubing Joints	All	Flareless compression fitting.
Fittings	1-1/2" & smaller	Threaded: Forged 1,000 CWP minimum, ASTM A182/A182M, Grade F316 or cast Class 150, ASTM A351/A351M, Grade CF8M/316.
	2" & 2-1/2"	Butt Welded: ASTM A403/A403M, Grade WP316L conforming to ASME B16.9 and MSS SP 43, annealed, pickled and passivated; fitting wall thickness to match adjoining pipe; long radius elbows, unless shown otherwise.
	3" & larger	Butt-Welded: ASTM A774/A774M Grade 316L conforming to MSS SP 43, "as-welded" grade, pickled and passivated; fitting wall thickness to match adjoining pipe; long radius elbows, 5D sweeps for cake service, unless shown otherwise.
Tubing Fittings	All	Flareless Compression Type Forged: ASTM A182/A182M, Grade F316, Parker-Hannifin Ferulok, Flodar BA Series.
Branch Connections	1-1/2" & smaller	Tee or reducing tee in conformance with fittings above.
	2" & larger	Butt-welding tee or reducing tee in accordance with fittings above.
Tubing Branch Connections	All	Compression type tees or reducing tees in accordance with Tubing Fittings above.

SPECIFICATION TO BE DEVAITED FROM

SECTION 15200-08D TYPE 316 STAINLESS STEEL PIPE AND FITTINGS—SLUDGE & CAKE SERVICE		
Item	Size	Description
Flanges	All	<p>Forged Stainless Steel: ASTM A182/A182M, Grade F316L, ASME B16.5 Class 150 or Class 300, slip-on weld neck or raised face.</p> <p>Cast Carbon Steel: ASTM A216/A216M Grade WCA, drilled, ASME B16.5 Class 150 or Class 300 Van Stone Type with stainless steel stub ends, ASTM A240 Type 316L “as-welded grade”, conforming to MSS SP 43, wall thickness same as pipe.</p> <p>Blind Flanges, exposed to the atmosphere and not buried nor immersed in liquid, shall be stainless steel with gaskets as specified herein.</p>
Unions	2" & smaller	Threaded Forged: ASTM A182/A182M, Grade F316, 2,000-pound or 3,000-pound WOG, integral ground seats, AAR design meeting the requirements of ASME B16.11, bore to match pipe.
Bolting	All	<p>Forged Flanges: Type 316 stainless steel, ASTM A320/A320M Grade B8M hex head bolts and ASTM A194/A194M Grade 8M hex head nuts.</p> <p>Van Stone Flanges: Carbon steel ASTM A307 Grade B hex head bolts and ASTM A563 Grade A hex head nuts. Provide same on mating cast iron flange on valve or equipment with flat ring gasket.</p> <p>Flanged Joints in Sumps, Wet Wells, and Submerged and Wetted Installations: Type 316 stainless steel, ASTM A320/A320M, Grade B8M hex head bolts and ASTM A194/A194M, Grade 8M hex nuts.</p>
Gaskets	All Flanges	<p>Flanged, Water and Sewage Service: 1/8 inch thick, unless otherwise specified, red rubber (SBR), hardness 80 (Shore A), rated to 200 degrees F, conforming to ASME B16.21, AWWA C207, and ASTM D1330, Grade 1 and Grade 2.</p> <p>Gaskets for sulfuric acid service shall be PTFE only.</p> <p>Blind flanges shall be gasketed covering entire inside face with gasket cemented to blind flange.</p>
Thread Lubricant	2" & smaller	General Service: 100% virgin PTFE Teflon tape.

END OF SECTION