

September 8, 2015

Mr. Jerry Paddock, P.E. Technical & Financial Assistance Bureau P.O. Box 201901 Helena, MT 59620-0901

RE: Town of Culbertson Wastewater Rehabilitation Project – Phase 2
AlS Waiver Request for Stainless Steel

Dear Mr. Paddock:

This letter constitutes a formal request on behalf of the Town of Culbertson to MDEQ/EPA for a waiver from the American Iron Steel (AIS) requirements for the stainless steel piping, fittings and bends for the above referenced project. The contractor for this project is Century Companies and the engineer is WWC Engineering. The following information reiterates the information required by the Waiver Request Checklist and our specific responses to each item as follows:

General

1. Description of the foreign and domestic construction materials.

This project requires stainless steel piping, Grade 304 for the aeration system. The stainless steel material is necessary in the vicinity of the blowers due to the extreme heat generated by the aeration blowers. A description, quantity and location of this required item shown on the engineering plans is located in Attachment A.

2. Unit of measure

The unit of measure of the stainless steel construction materials are shown in Attachment A.

3. Quantity

The quantity of the stainless steel construction materials are shown in Attachment A.

4. Price

The price for the AIS stainless steel is not provided as the suppliers cannot provide AIS stainless steel with a certification.

5. Time of delivery or availability

The stainless steel for the aeration blowers is not available. The contractor's pipe supplier has contacted 10 individual stainless steel suppliers, all of which will not provide an AIS certification for their material. They claim they can provide "domestic" certified steel but not AIS certified steel due to an alloy that is applied to the pipe.

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6. Location of the construction project

The construction project is located approximately 1 mile south of the Town of Culbertson. The Town of Culbertson is located along the Missouri River in the eastern portion of Roosevelt County.

7. Name and address of the proposed supplier

The proposed pipe supplier is: Northwest Pipe Fittings 33 South 8th Street West Billings, MT 59103

8. A detailed justification for the use of foreign construction materials

The contractor and supplier have contacted 10 stainless steel suppliers and all of the suppliers have stated that they will not sign the AIS certification that is required.

A list of the suppliers that have been contacted are located in Attachment B. Several suppliers claim that they can meet the "domestic" steel requirements but due to an alloy that is applied to all of the stainless steel they will not sign the AIS certification form. The current construction schedule that is provided in Attachment C shows that the aeration piping inside the building is to commence at the beginning of October.

Availability Waiver Request

1. Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials.

The list of suppliers and their contact information is included in Attachment B. A total of 10 suppliers were contacted.

Documentation of the assistance recipient's efforts to find available domestic sources, such as a description of the process for identifying suppliers and a list of contacted suppliers.

The contractor and Northwest Pipe Fittings supplier contacted several stainless steel suppliers initially and immediately informed WWC Engineering that they were having issues obtaining AIS certified stainless steel. WWC had several conversations with SRF and were able to find an AIS waiver request that was denied by the EPA for Williston, ND. On this waiver request denial the EPA identified manufactures that could meet the AIS certification.

The contractor had Northwest Pipe Fittings contact these two manufacturers and were told by these companies that they could not meet the AIS certification for all of the stainless steel products they were requesting.

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3. Project schedule

A project schedule is located in Attachment C.

 Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials

Relevant excerpts from the project plans have been included in Attachment D.

Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought.

A cover letter and documentation emails from the contractor have been included in Attachment E.

6. Has the State received other waiver requests for the materials described in this waiver request, for comparable projects?

To our knowledge the State of Montana has not received any other waiver request for the materials described in this waiver request.

It is our sincere hope that the requirements have been adequately addressed and that the **Town of Culbertson AIS Waiver Request for Stainless Steel** submittal be reviewed as soon as possible. Please do not hesitate to contact us should you have any further questions or require additional clarification.

Sincerely,

Drew Pearson, P.E. Project Manager

cc: File

Encl.: As Noted

DP

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This waiver request was submitted to the EPA by the state of Montana on behalf of the Town of Culbertson. All supporting correspondence and/or documentation from contractors, suppliers or manufacturers included as a part of this waiver request was done so by the recipient to provide an appropriate level of detail and context for the submission.

Some of the referenced attachments with project 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

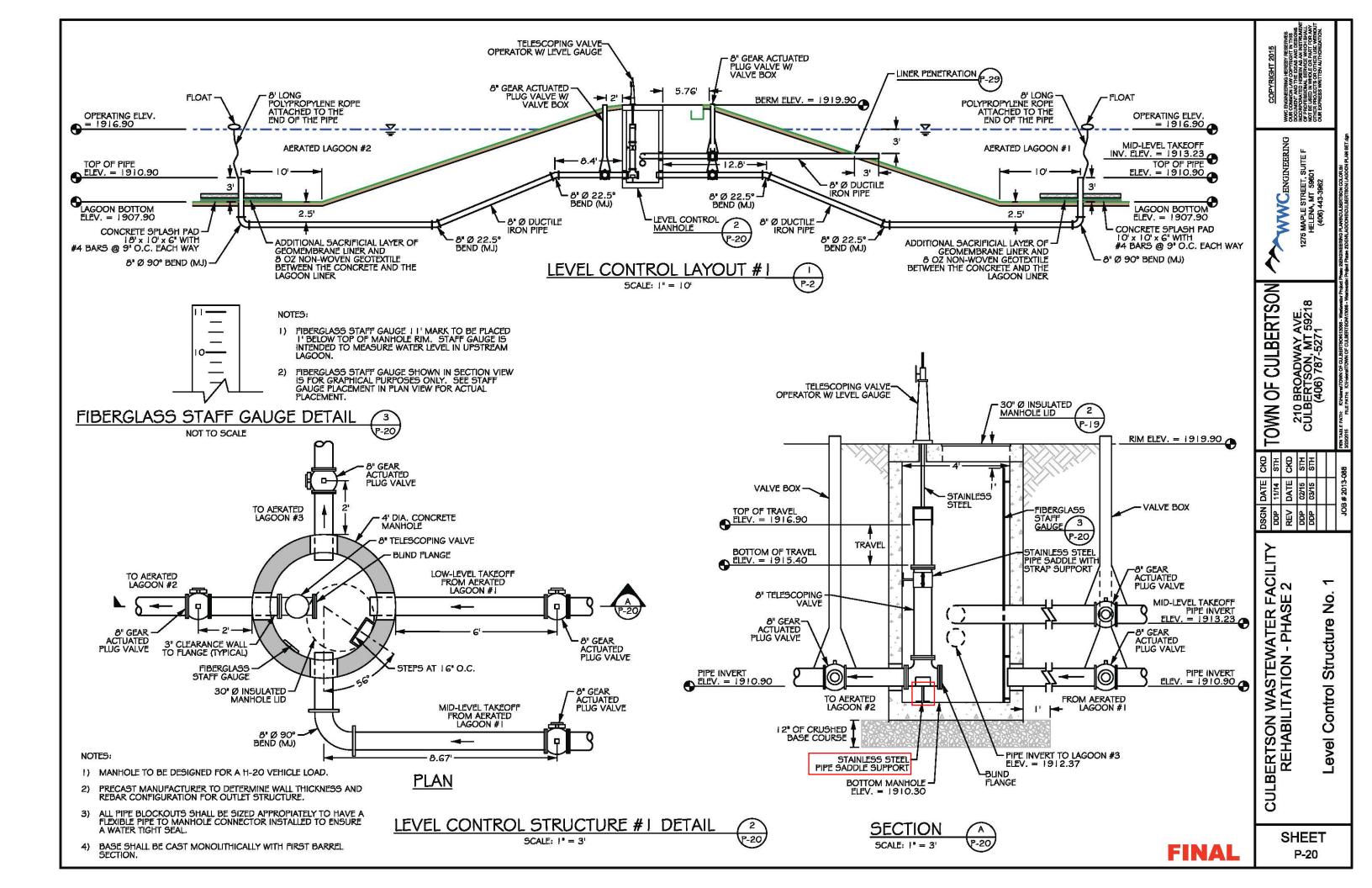
ATTACHMENT A

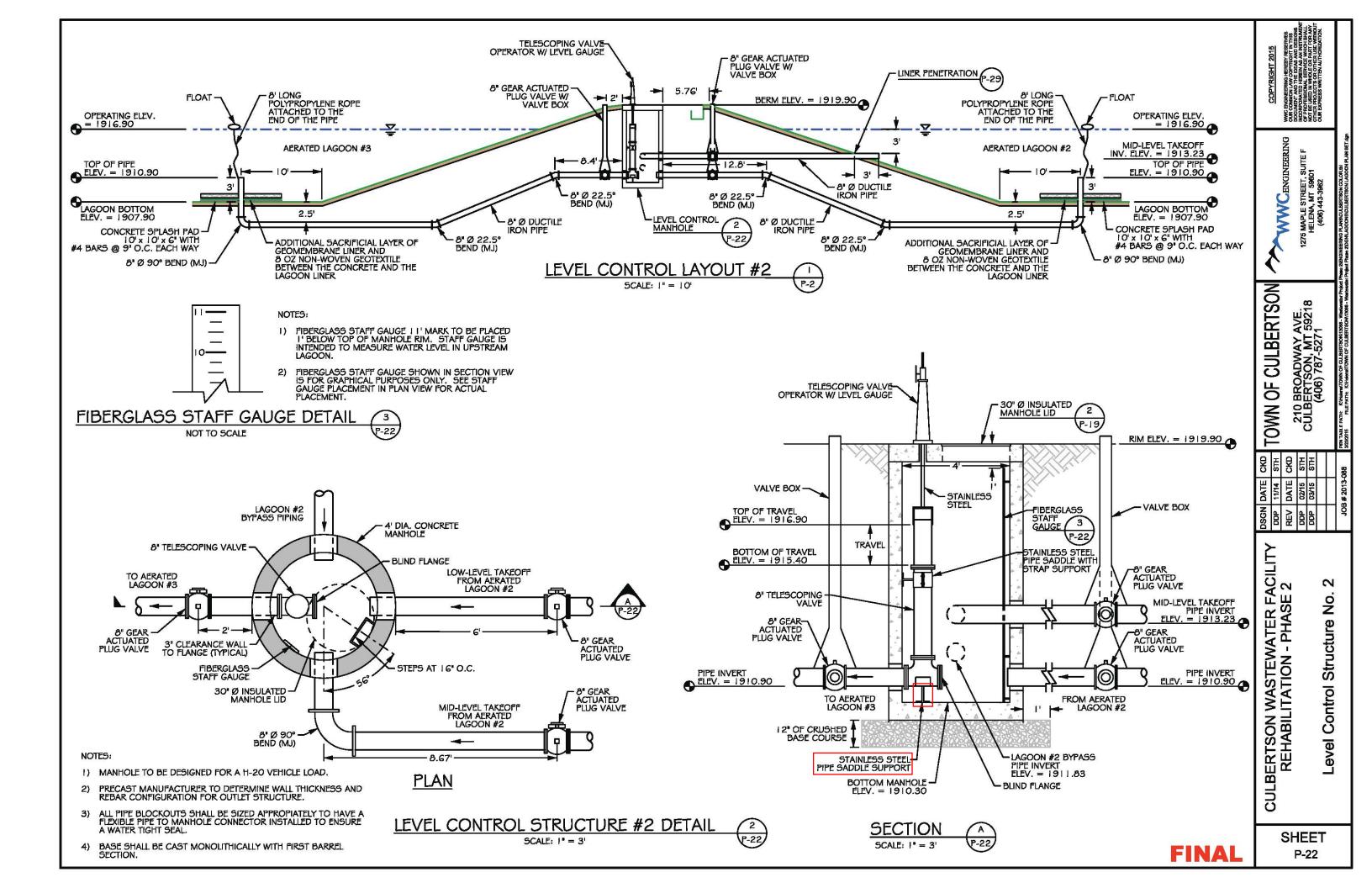
Stainless Steel Item Details

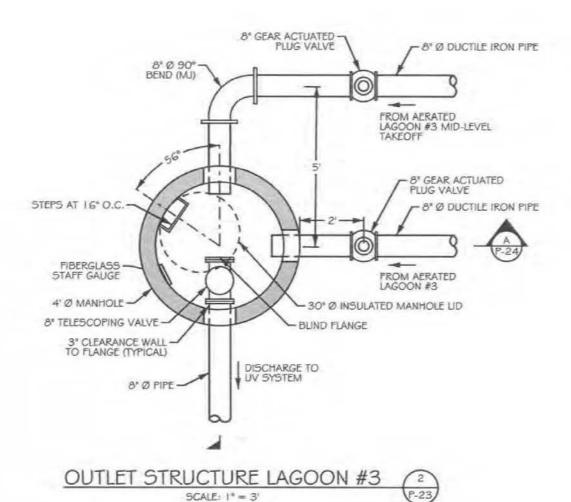
DESCRIPTION	QTY	UNIT	PLAN SHEET	USED FOR	
6" X 3" X 6" S.S. TEE	1	EA	B-4	BLOWER MANIFOLD	
6" X 4" X 6" S.S TEE	4	EA	B-4	BLOWER MANIFOLD	
4" S.S. CHECK VALVE	4	EA	B-4	BLOWER MANIFOLD	
6" S.S. 90° ELBOW	1	EA	B-4	BLOWER MANIFOLD	
6" X 3" S.S. REDUCER	1	EA	B-4	BLOWER MANIFOLD	
6" S.S PIPE	10'	LF	B-4	BLOWER MANIFOLD	
6" BLIND FLANG	1	EA	B-13, DETAIL DRAWING	BLOWER MANIFOLD	
4" S.S PIPE	10	LF	B-4	BLOWER MANIFOLD	
4" S.S PIPE	40	LF	P-31	AIR PIPING FROM MANIFOLD TO HDPE	
4" S.S PIPE	70	LF	P-31	AIR PIPING FROM MANIFOLD TO HDPE	
4" S.S PIPE	60	LF	P-31	AIR PIPING FROM MANIFOLD TO HDPE	
4" S.S PIPE	50	LF	P-31	AIR PIPING FROM MANIFOLD TO HDPE	
4" S.S 90° ELBOW	12	EA	P-31, B-13	AIR PIPING FROM MANIFOLD TO HDPE	
3" S.S PIPE	230	LF	P-32 TO P-38	AIR PIPING IN LAGOONS	
3" S.S 90° ELBOW	10	EA	P-32 TO P-38	AIR PIPING IN LAGOONS	
3" S.S FLANGE	6	EA	P-32 TO P-38	AIR PIPING IN LAGOONS	
4" S.S S.S PIPE	200	LF	P-32 TO P-38	AIR PIPING IN LAGOONS	
4" S.S 90° ELBOW	12	EA	P-32 TO P-38	AIR PIPING IN LAGOONS	
4" S.S FLANGE	8	EA	P-32 TO P-38	AIR PIPING IN LAGOONS	
2" S.S. PIPE SCH. 40	40	LF	B-11	GUIDE RAILS FOR SUBMERSSIBLE PUMPS	
2" S.S. PIPE SCH. 40	20	LF	P-20, P-22, P-24, P-46, B-10	PIPE STANDS	
2" S.S. PIPE SCH. 80	60	LF	P-20, P-22, P-24 MOVED INTO LAGOONS	STAFF GUAGE POSTS	
MISC. CONNECTIONS AND ACCESSORIES				WHERE NEEDED	
ADDITIONAL FITTINGS			IF NECESSARY	AS NEEDED	

ATTACHMENT E

Project Plan Excerpts

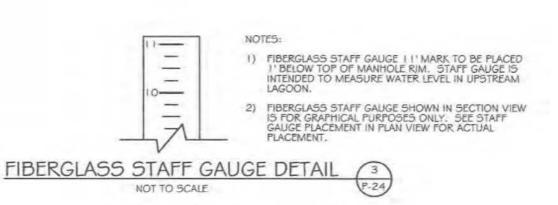


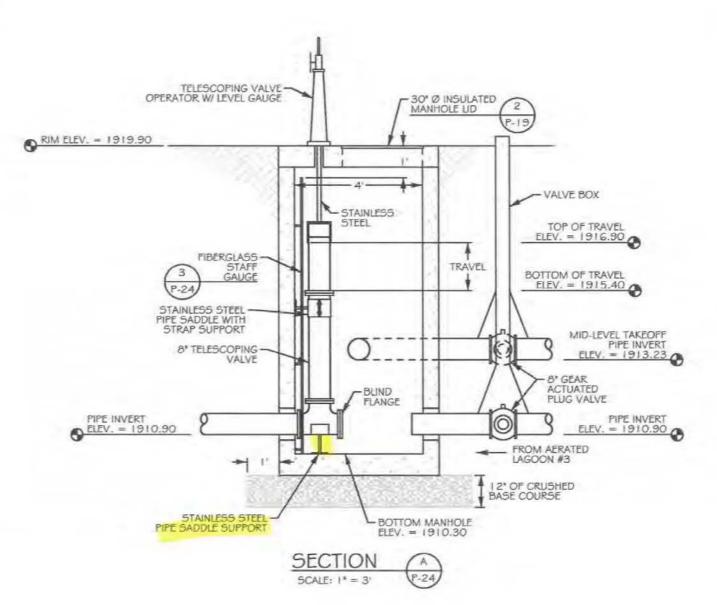




NOTES:

- 1) MANHOLE TO BE DESIGNED FOR A H-20 VEHICLE LOAD.
- PRECAST MANUFACTURER TO DETERMINE WALL THICKNESS AND REBAR CONFIGURATION FOR OUTLET STRUCTURE.
- ALL PIPE BLOCKOUTS SHALL BE SIZED APPROPIATELY TO HAVE A FLEXIBLE PIPE TO MANHOLE CONNECTOR INSTALLED TO ENSURE A WATER TIGHT SEAL.
- 4) BASE SHALL BE CAST MONOLITHICALLY WITH FIRST BARREL SECTION.





FINAL

SHEET P-24

CULBERTSON WASTEWATER FACILITY REHABILITATION - PHASE 2

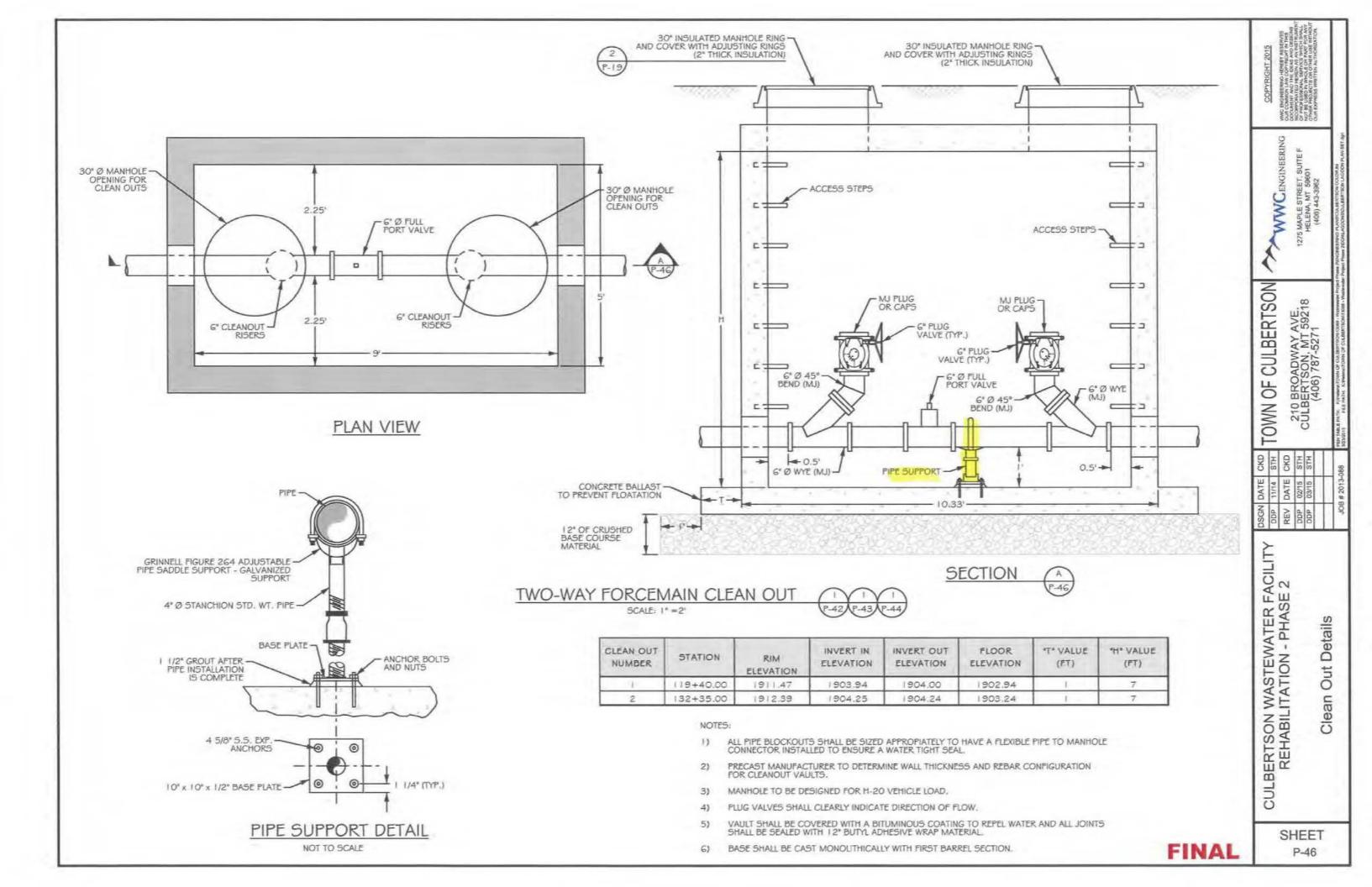
WWCENGINEERING

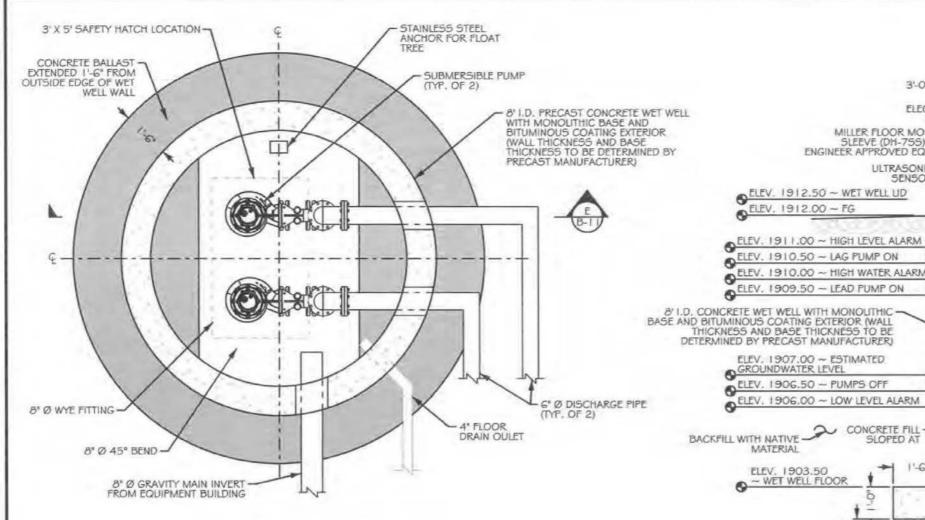
TOWN OF CULBERTSON

210 BROADWAY AVE. CULBERTSON, MT 59218 (406) 787-5271

Details

Outlet Structure Lagoon #3





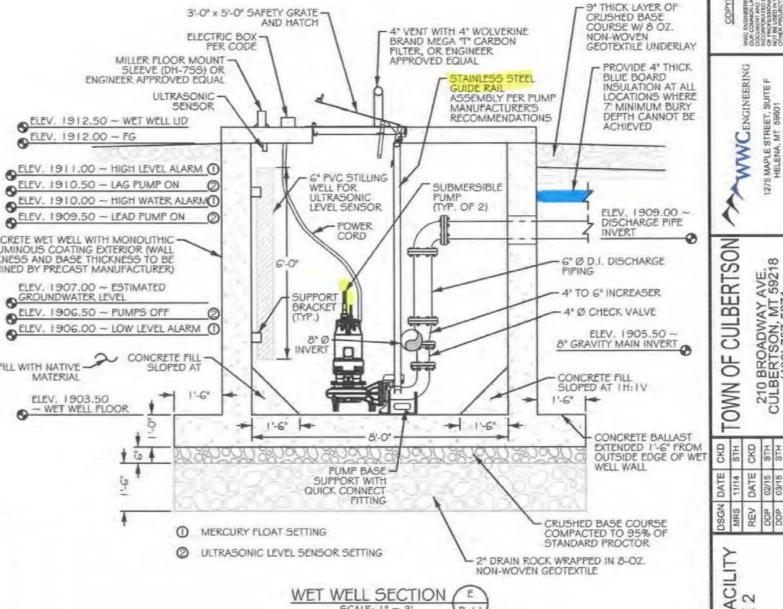
	MECHANICA	AL PAINTING SCHED	ULE		
APPLICATION	SURFACE PREPARATION	PAINT MATERIAL	COLOR	MINIMUM COATS	MINIMUM DRY FILM THICKNESS
EXPOSED DUCTILE IRON (DI) PIPING AND FITTINGS IN THE WET WELL	ABRASIVE BLAST OR CENTRIFUGAL WHEEL BLAST (SP 5 WHITE METAL)	POLYMIDE EPOXY	DARK GREY	3	4 MILS/COAT
EXPOSED DI PIPE, VALVES AND FITIINGS IN THE LIFT STATION BUILDING	ABRASIVE BLAST OR CENTRIFUGAL WHEEL	POLYMIDOAMINE EPOXY PRIMER	N/A	T	3 MILS/COAT
	BLAST (SP 10 NEAR WHITE)	POLYMIDOAMINE EPOXY PRIMER	DARK GREY	2	4 MILS/COAT

NOTES:

- 1. PRECAST WET WELL BASE AND FIRST BARREL SECTION SHALL BE A MONOLITHIC POUR.
- 2. WET WELL SHALL HAVE A BITUMINOUS COATING EXTERIOR.

WET WELL PLAN VIEW

- AT EVERY JOINT ALL CONCRETE MANHOLE RISERS SHALL: BE WRAPPED ON THE EXTERIOR WITH I 2-INCH WIDE BUTYL ADHESIVE TAPE, BE FURNISHED WITH TWO PARALLEL STRIPS OF RAM NECK BETWEEN BARREL SECTIONS, AND COATED WITH BITUMINOUS TAR.
- THE MANHOLE PRECAST MANUFACTURER SHALL TEST FIT ALL PRECAST COMPONENT AT THEIR FACILITY, FIX ANY ISSUES THAT PREVENT THE MANHOLE SECTIONS FROM ASSEMBLING CORRECTLY, AND PAINT MATCH LINES ON THE EXTERIOR OF THE MANHOLE SECTIONS FOR HOW THEY'VE TESTED THE SECTIONS AND ACHIEVED PROPER
- 5. ACCESS HATCH SHALL BE CAST FLUSH IN PRECAST CONCRETE COVER.
- ALL EXPOSED DUCTILE IRON PIPE AND FITTINGS SHALL BE MANUFACTURED AND DELIVERED WITH NO ASPHALTIC COATING, BUT SHALL BE COATED OUTSIDE WITH A FACTORY-APPLIED, HIGH-SOLIDS EPOXY PRIMER COMPATIBLE WITH THE FINISHED COATING SPECIFIED IN THE PAINTING SCHEDULE.
- ALL HARDWARE WITHIN THE WET WELL SHALL BE STAINLESS STEEL. AN INSPECTION REPORT CERTIFYING THESE MATERIALS ARE STAINLESS STEEL SHALL BE SUPPLIED TO THE TOWN OF CULBERTSON AT BOTH INTERIM AND FINAL ACCEPTANCE.



- FLOOR MOUNT FOR THE MAN LIFT SHALL BE A MILLER FLOOR MOUNT SLEEVE (DH-755) OR APPROVED EQUAL. FLOOR MOUNT SHALL BE COMPATIBLE WITH THE EXISTING MAN LIFT OWNED BY THE TOWN. CONTACT THE ENGINEER TO ENSURE COMPATIBILITY. FLOOR MOUNT SHALL BE POSITIONED TO ALLOW UNOBSTRUCTED ENTRY INTO THE WET WELL WITHOUT REMOVING THE WET WELL ACCESS HATCH DOORS.
- INSTALL P-TRAP AND 1-1/2* VENT PIPING ON FLOOR DRAIN LINE AND SLOPE 1/4* PER FOOT TOWARDS THE WET WELL. EXTEND VENT PIPING THROUGH THE ROOF AND INSTALL 3* CARBON FILTER (ORENCO MODEL CF3 OR EQUAL) ON THE
- 10, FLOOR DRAIN SHALL BE CAST IRON BODY WITH ADJUSTABLE STRAINER (JOSAM 30000-A OR EQUAL).
- 11. PROVIDE LINK SEAL, OR APPROVED EQUAL, ON ALL PIPE PENETRATIONS INTO WET WELL. VOID SPACE AROUND PIPE
- 12. ULTRASONIC SENSOR SHALL BE PRIMARY LIQUID LEVEL CONTROL SIGNAL WITH HIGH/HIGH AND LOW/LOW SIGNALS AND DISCRETE SIGNALS FROM FLOATS.
- 13. CONTRACTOR SHALL LEAK TEST THE WET WELL TO ENSURE THAT THE WET WELL IS WATER-TIGHT.
- 14. BACKFILL AROUND WET WELL WITH NATIVE MATERIAL, PLACED IN MAXIMUM LOOSE LIFT THICKNESSES OF 8", AND COMPACTED TO AT LEAST 95% OF THE STANDARD PROCTOR DENSITY, FLOWABLE FILL MAY BE USED AROUND THE DUCTILE IRON PIPE, AS APPROVED BY THE ENGINEER.
- 15. THE SUBMERSIBLE PUMPS SHALL MEET ALL OF THE REQUIREMENTS IN THE SPECIFICATIONS

ERTSON WASTEWATER FACILITY REHABILITATION - PHASE 2 m CUL

SHEET

B-11

Details

Well

Wet

WWCENGINEERI

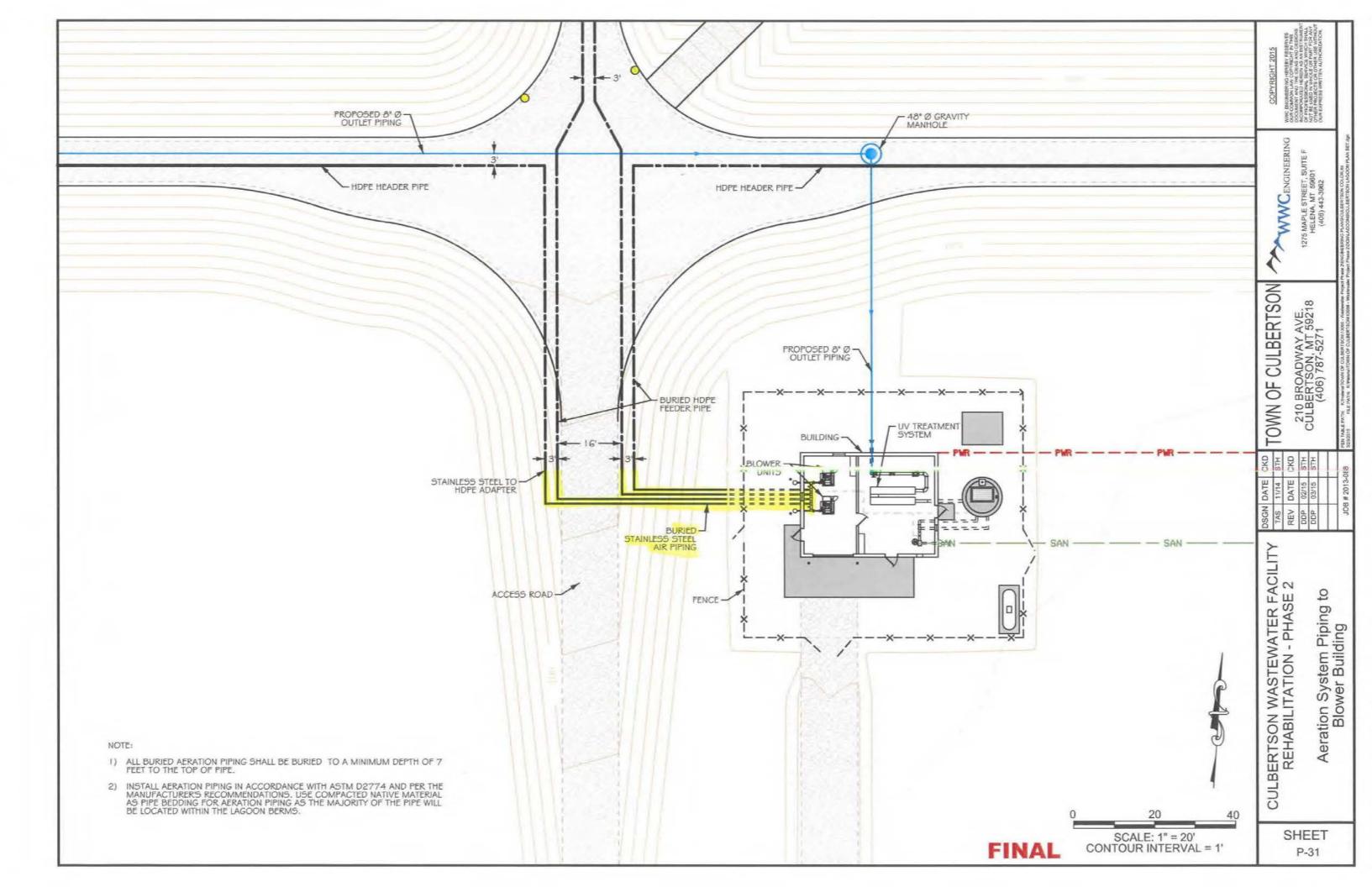
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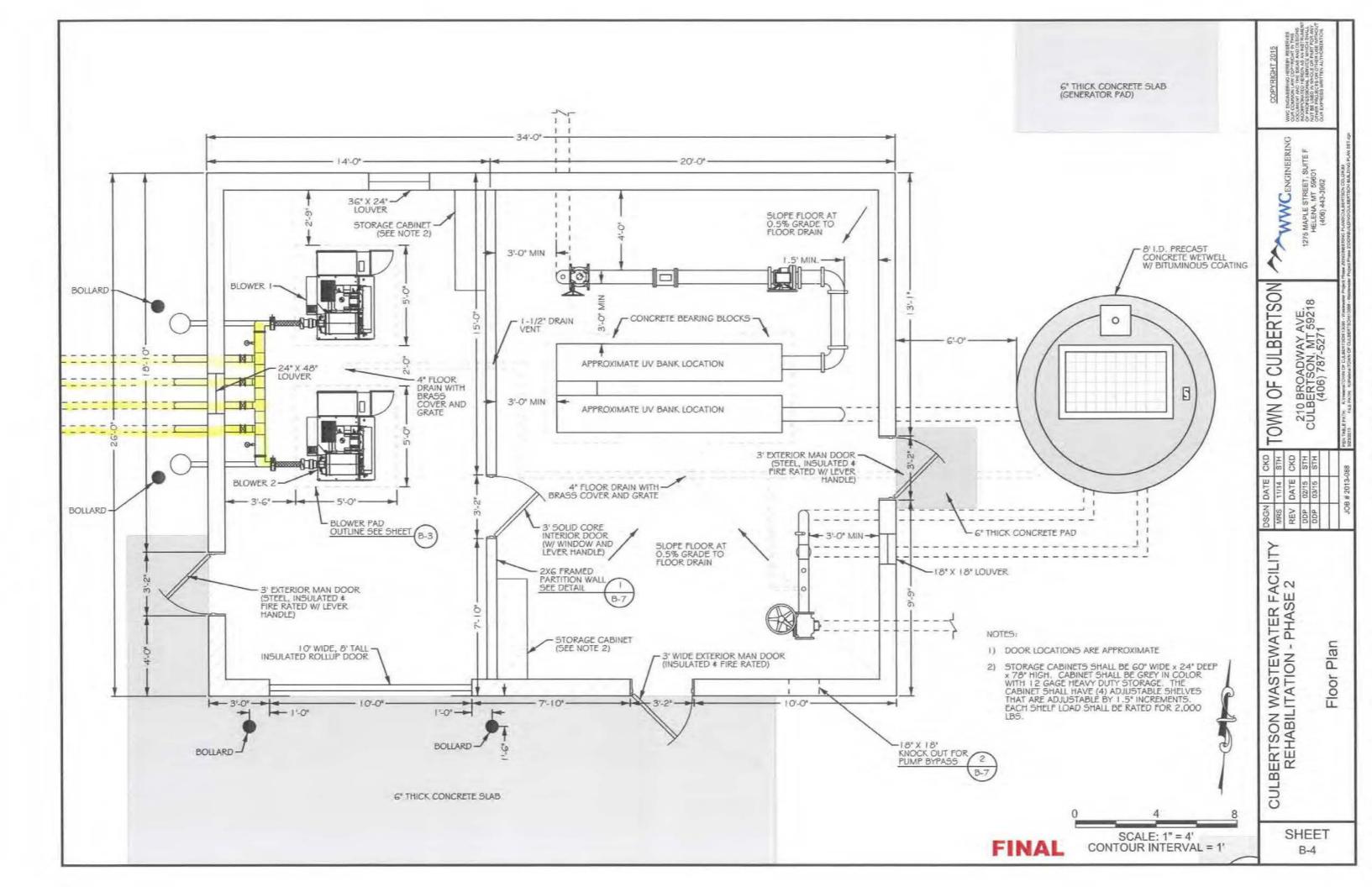
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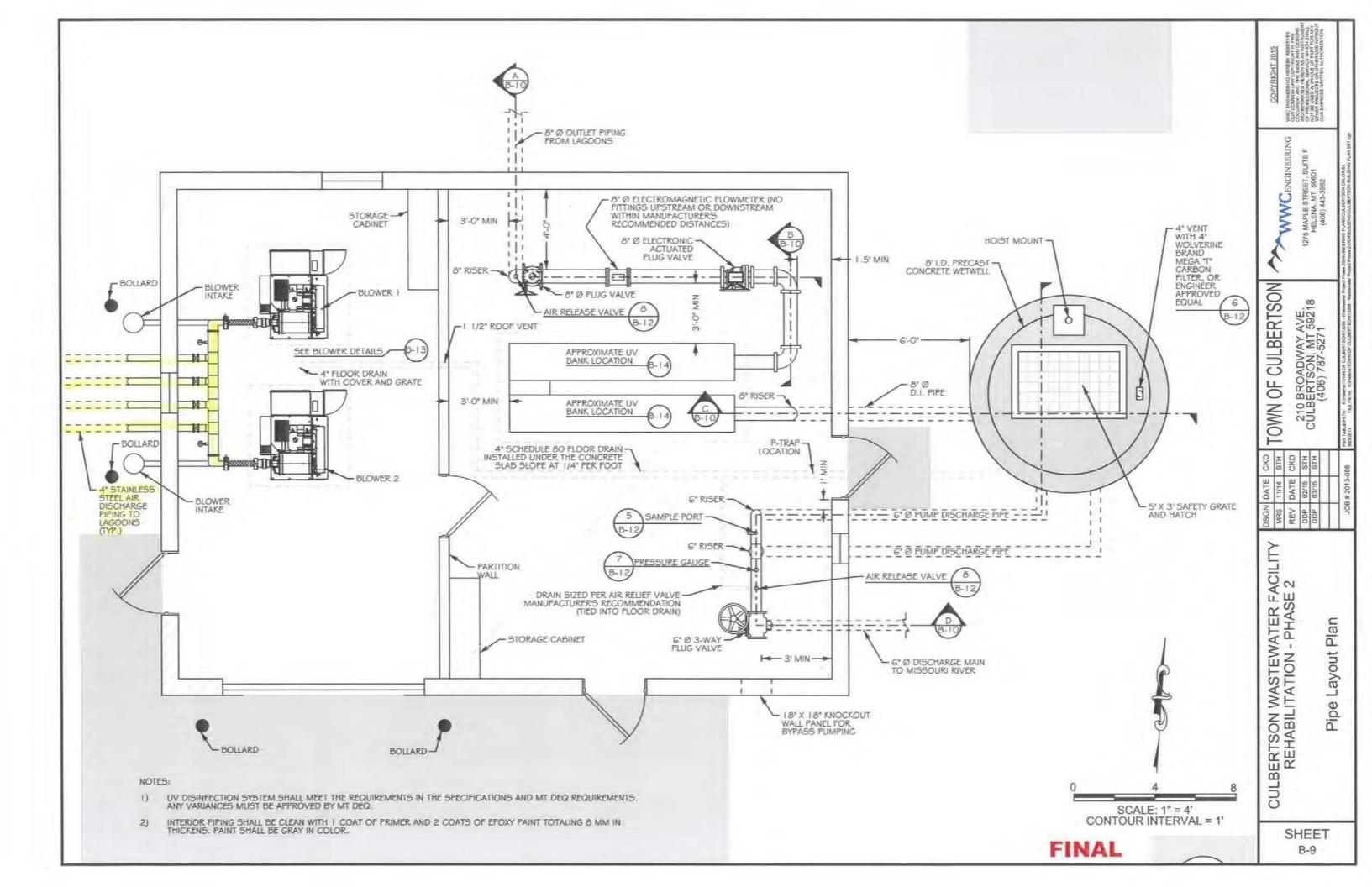
BROADWAY / BERTSON, MT (406) 787-5271

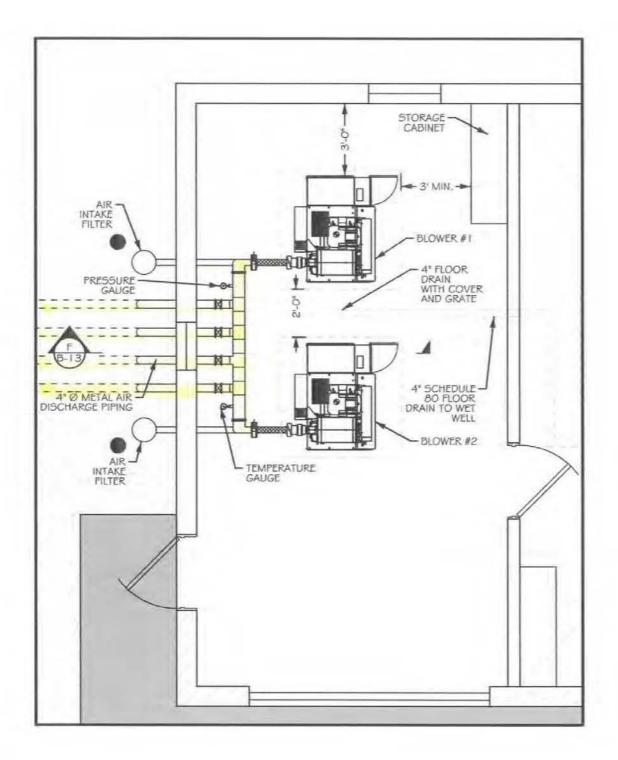
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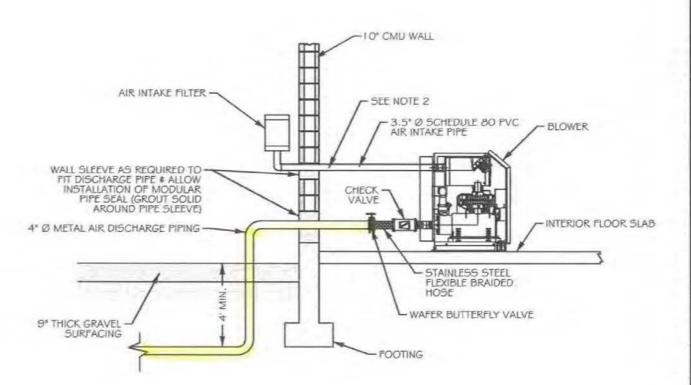








BLOWER PLAN DETAIL 5CALE: 1* = 4'





NOTES:

- 1) ALL PIPING AFTER WAFER BUTTERLY VALVE TO THE LAGOONS SHALL BE CONTRACTOR FURNISHED.
- 2) PIPING BETWEEN BLOWER AND AIR INTAKE FILTER SHALL BE CONTRACTOR FURNISHED.

TOWN OF CULBERTSON 210 BROADWAY AVE. CULBERTSON, MT 59218 (406) 787-5271 CULBERTSON WASTEWATER FACILITY REHABILITATION - PHASE 2 Blower Details SHEET

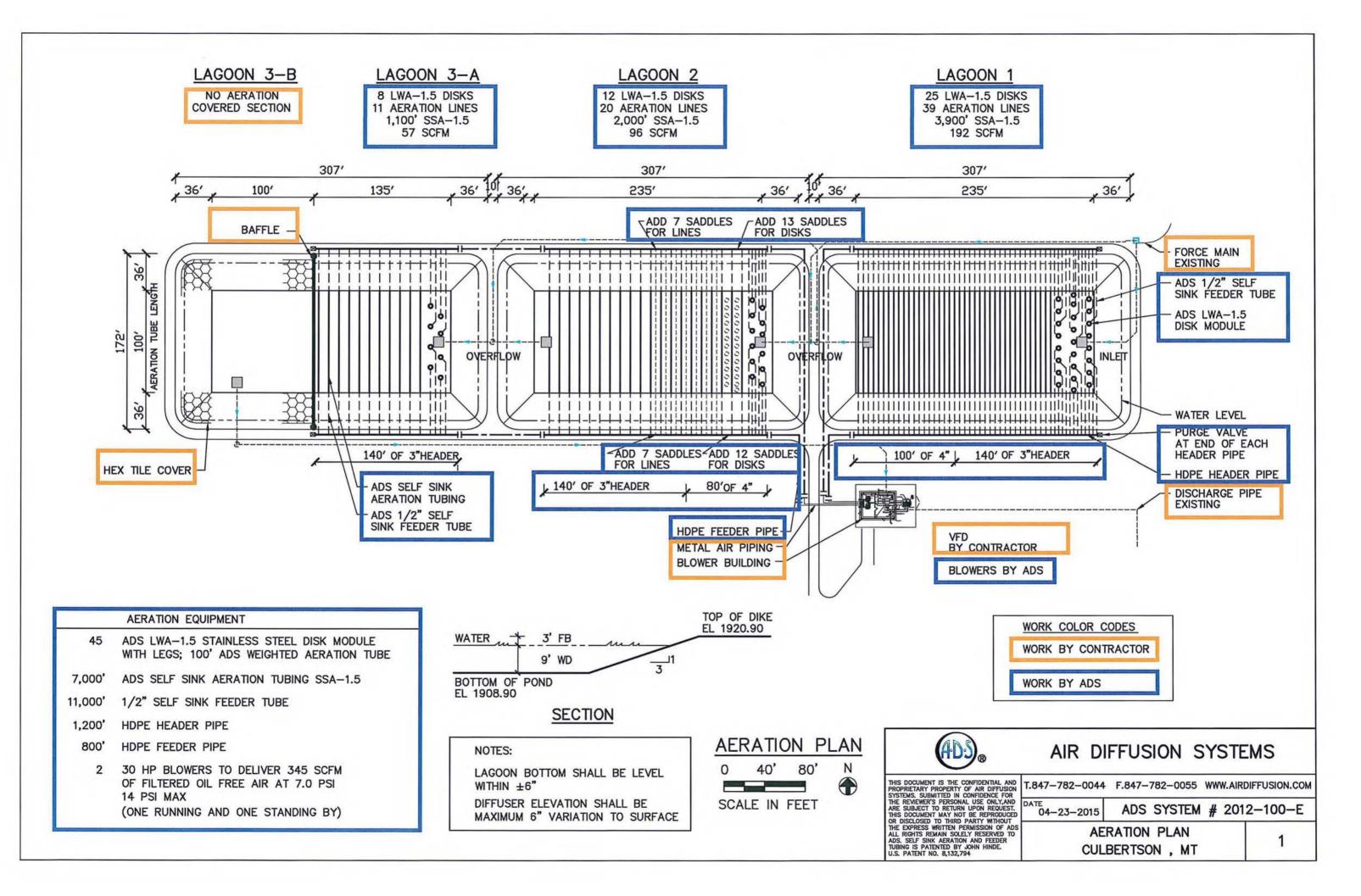
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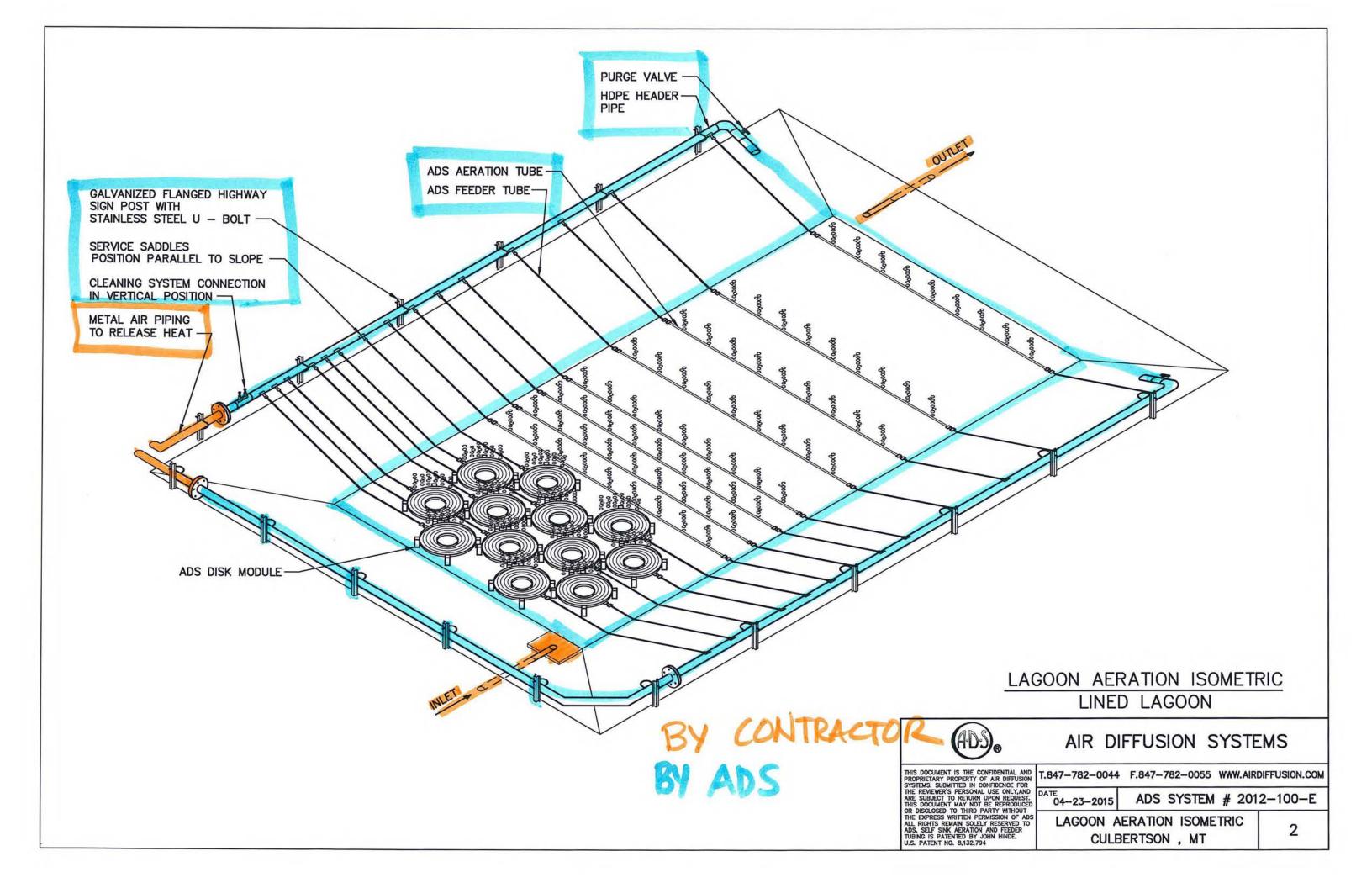
(275 MAPLE STREET, SUIT HELENA, MT 59601 (406) 443-3962

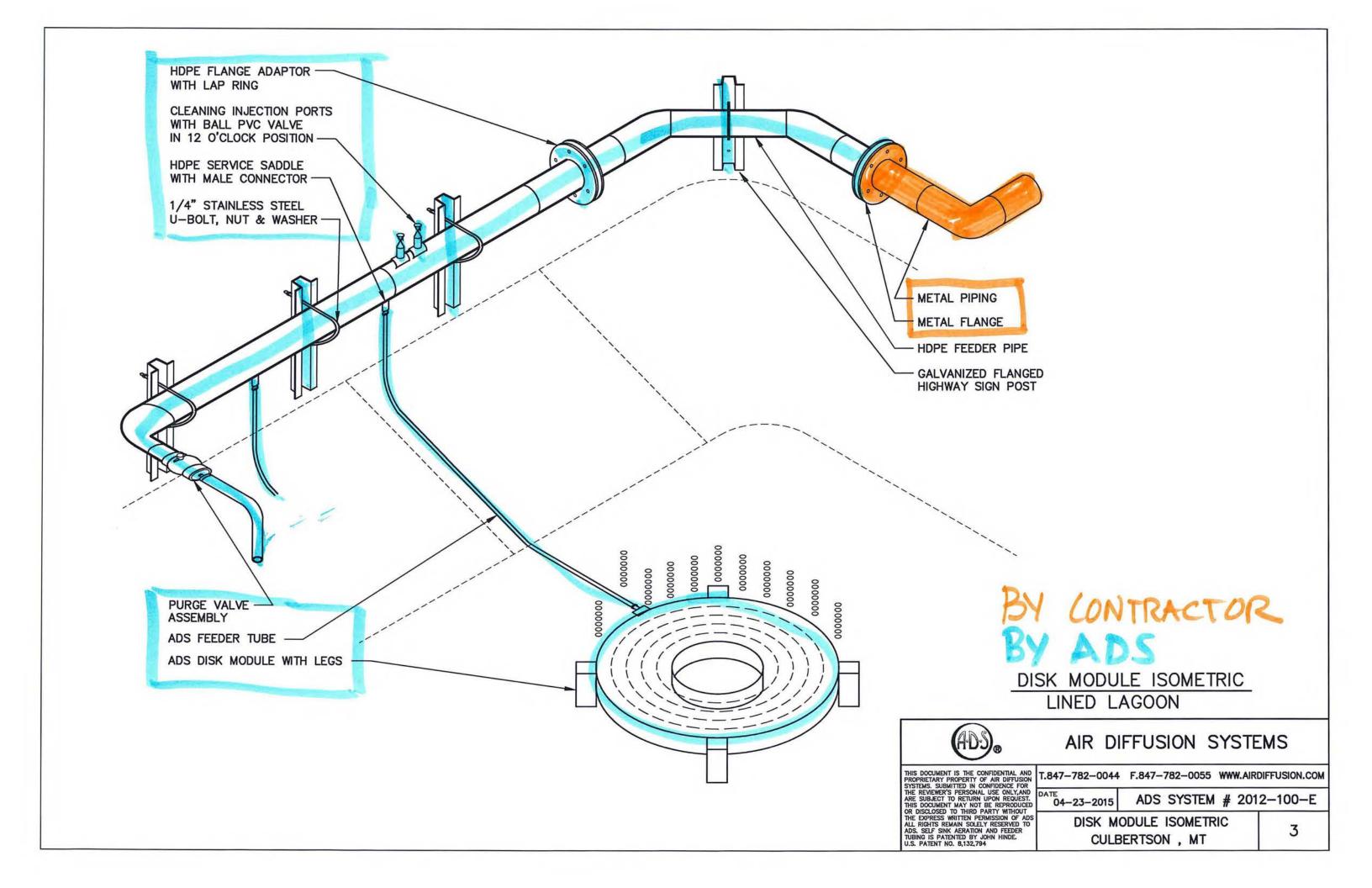
WWCENGINEERING

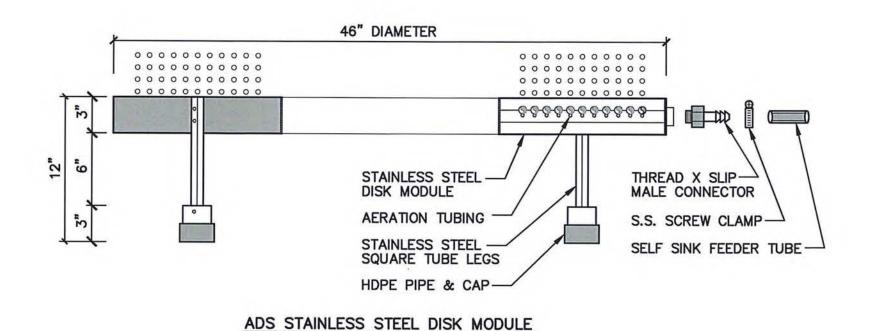
FINAL

SHEET B-13

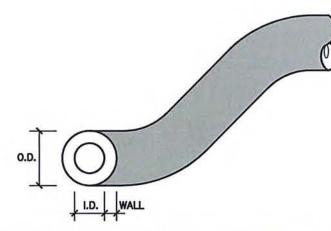








WITH LEGS



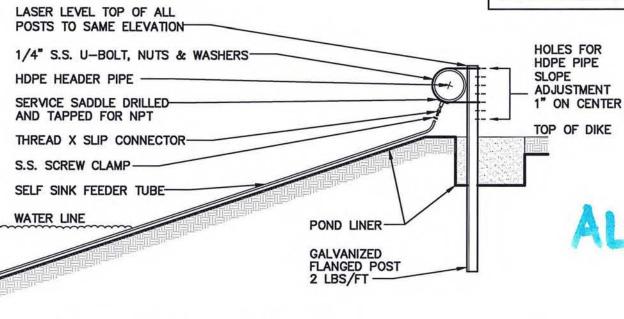
	SSFT - 50	SSFT - 75	SSFT - 100	SSFT - 125	SSFT - 150
I.D. (IN)	0.50	0.75	1.00	1.25	1.50
O.D. (IN)	1.00	1.36	1.81	2.25	2.55
WALL (IN)	0.25	0.30	0.40	0.50	0.525
WT/FT (LBS)	0.50	0.74	1.31	2.40	2.80

MATERIAL - HIGHLY FILLED VINYL COMPOUND

COLOR - BLACK WITH CARBON ADDITIVE FOR UV PROTECTION

BURST - 225 PSI

SPOOLS AVAILABLE: 1/2"=500', 3/4"=300', 1"=100', 1-1/4"=100', 1-1/2"=100'



SELF SINK FEEDER TUBE DETAIL

ALL BY ADS

DISK MODULE DETAILS
LINED LAGOON



AIR DIFFUSION SYSTEMS

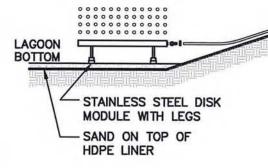
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O4-23-2015 ADS SYSTEM # 2012-100-E

DISK MODULE DETAILS CULBERTSON , MT

4

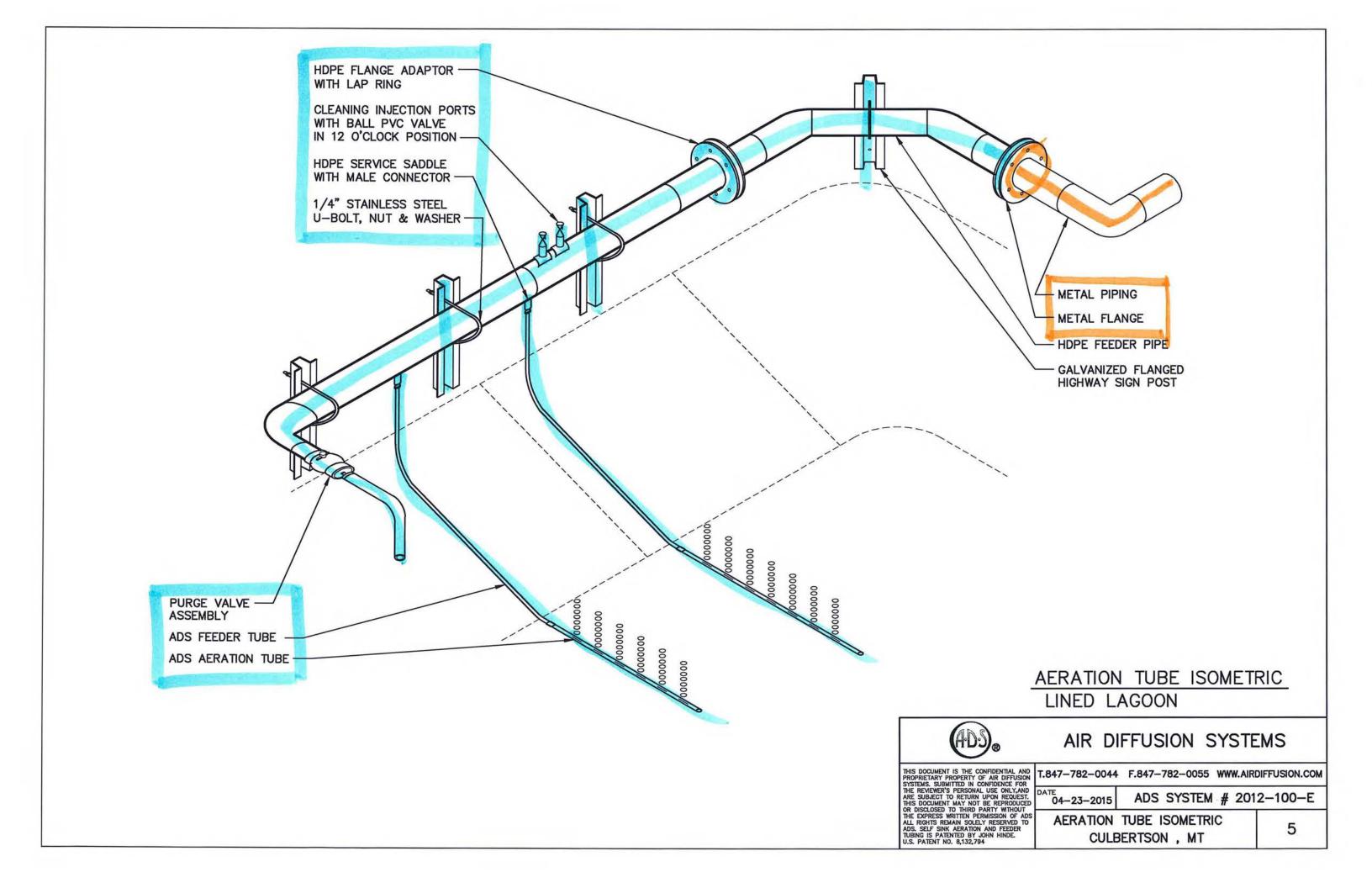


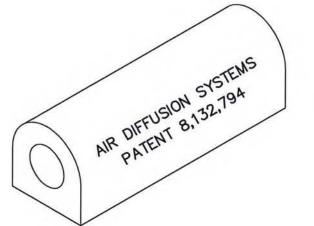
SPACING BETWEEN SUPPORT
POST FOR HDPE PIPE

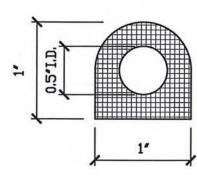
PIPE SIZE 2" 3" 4" 6"

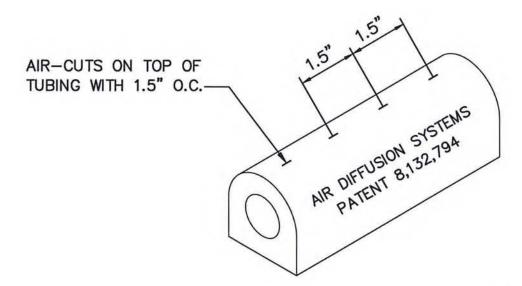
DISTANCE 3' 3' 3' 4'

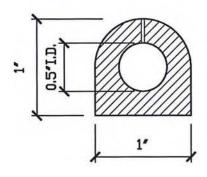
HDPE PIPE SUPPORT AND HEADER PIPE TO DISK MODULE CONNECTION DETAIL











SELF SINK FEEDER
TUBE - SSFT

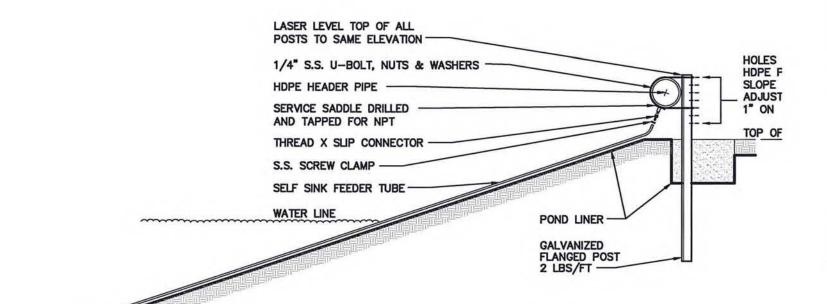
SELF SINK AERATION TUBE - SSA 1.5

SELF SINK MATERIAL

MATERIAL - HIGHLY FILLED VINYL COMPOUND

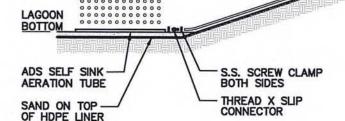
COLOR — BLACK WITH CARBON ADDITIVE FOR UV PROTECTION

WEIGHT - 0.49 POUNDS/FOOT 0.73 KILOGRAMS/METER



ALL BY ADS

AERATION TUBE DETAILS
LINED LAGOON



SPACING BETWEEN SUPPORT POST FOR HDPE PIPE						
PIPE SIZE	2"	3"	4"	6"		
DISTANCE	3'	3'	3'	4'		

HDPE PIPE SUPPORT AND HEADER PIPE TO SELF SINK AERATION TUBE CONNECTION



AIR DIFFUSION SYSTEMS

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DATE 04-23-2015 ADS SYSTEM # 2012-100-E

AERATION TUBE DETAILS CULBERTSON, MT

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