



City of Mosinee

225 Main Street, Mosinee, Wisconsin 54455 715/693-2275 Fax: 715/693-1324
www.mosinee.wi.us

American Planning Association National Award Community

January 28, 2015

Ms. Becky Scott
Wisconsin Department of Natural Resources
Bureau of Community Financial Assistance
PO Box 7921
Madison, Wisconsin 53707-7921

RE: MOSINEE WATER TREATMENT SYSTEMS, CITY OF MOSINEE
BUTTERFLY VALVE WAIVER REQUEST

Dear Ms. Scott:

This letter is a formal request on behalf of the City of Mosinee submitted to the WDNR in application for a waiver from the American Iron and Steel Appropriations Act of 2014 (AIS,2014) requirements as it pertains to the Butterfly valves on the above referenced project.

Background Considerations. Bidding documents for the equipment to be used on the City's water treatment facility upgrade included a provision for compliance with AIS,2014. The successful bidding filter manufacturer, Artesian of Pioneer (AOP) bid the job with non-compliant valves after researching the EPA's website and finding that tanks being a part of a more general filtration system were not required to comply with the Act. A "Q&A Part 2" document from the EPA website is attached for reference to this determination (see appendix 2; #1). AOP's interpretation of this, was that all filtration system components would be exempt from the rule because the valves, just like a tank, are part of a larger component, a filter system. Based on this, AOP did not believe that compliance was an issue, but nonetheless contacted Bray to find out if their valves were compliant. Subsequently Bray Controls sent a letter that stated that they had valves that were compliant with the AIS,2014 (appendix 2; #2) in case this was required. Once the submittal process started, the engineer, Town and Country Engineers, had a different interpretation of the Q & A Part 2 document and told AOP through the submittal process that they believed the valves did in fact need to be AIS, 2014 compliant. Based on this response, AOP was happy to comply. AOP reached out to Bray on January 22, 2015 to find out the change in lead times for the AIS,2014 compliant valves and found that this requirement increased the suppliers lead time from 6 weeks to 16-18 weeks. This was a substantial change in lead time and no longer fit into the project schedule. AOP then contacted two other high quality manufacturers that they would feel comfortable using as a component of their filtration system. The first was Henry Pratt Company and they received a response that HPC's AIS,2014 compliant valves had a lead time of 20-22 weeks. (Appendix 2; #3) Finally, AOP reached out to Flomatic to inquire about their AIS, 2014 compliant valves and they were told that Flowmatic does not even offer butterfly valves that are compliant with AIS, 2014. (Appendix 2; #4).

AIS Waiver Request. The City of Mosinee along with our engineer, Town and Country Engineers set a Phase 1 completion deadline of March 28, 2015 and a Phase 2 completion date of May 12, 2015. The primary reason for this deadline constraint was to finish construction prior to the late spring/summer months to avoid the higher water demand period that is typically experienced for our system. As portions of the treatment plant are placed offline for repair and replacement, the City would run the risk of not meeting the water demand/fire protection that is required in the higher demand months. (Reference the letter from the engineer in Appendix 2). In addition, the General Contractor has already started the construction and a delay in equipment delivery would potentially change the contract scope and cost of accommodating those delays. For all of these reasons, the City of Mosinee respectfully requests that a waiver be granted for the use of non-AIS, 2014 compliant butterfly valves to be used on the water treatment system project. We believe a 16-22 week lead time for butterfly valves is an unreasonably long period of time. A majority of these butterfly valves are needed to complete the Phase 1 portion of the project. Even if AOP had ordered the valves immediately after the bid and prior to the submittal approval process, the 16-22 week lead time on the valves still would not have worked within the constraints of the project schedule.

We believe that a waiver should be granted to ensure that the project deadline can be met and that construction on the water system can continue to move forward as to not interfere with the City's ability to provide sufficient water to its residents. Please consider this request for waiver and let us know if you have any questions or need additional information regarding this request.

If you have any questions or need any additional information please contact the City's Public Works Director, Kevin Breit. Mr. Breit can be reached at 715-693-3840 or email to: publicworks@mosinee.wi.us.

Your favorable consideration of this waiver request is certainly appreciated by the City of Mosinee!

Sincerely,



Alan Erickson
Mayor

mayor@mosinee.wi.us

NOTE: The referenced Appendices (1 and 2) with project specifications and 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.