



WATER & WASTEWATER FACILITIES City of Kingsport, Tennessee

March 21, 2016

Rick Hogshead
State Revolving Fund Loan Program
William R. Snodgrass, Tennessee Tower
312 Rosa L. Park Avenue, 12th Floor
Nashville, Tennessee 37243-1102

Subject: Request for Waiver of American Iron and Steel Requirements

Dear Mr. Hogshead:

We are seeking a waiver of the American Iron and Steel requirements for butterfly valves for the Raw Water Intake and Transmission Improvements project in Kingsport, Tennessee. The project includes the following butterfly valves:

- Two flanged 30-inch butterfly valves
- Two mechanical joint 36inch butterfly valves
- Two mechanical joint 30-inch butterfly valves
- Three mechanical joint 20-inch butterfly valves

The proposed supplier is Kennedy Valve located at 1901 E. Water Street, Elmira, NY 14901. M&H Valve holds the design for the butterfly valves and is located at 605 W. 23rd Street, Anniston, AL 36201. Total cost for the butterfly valves is quoted at \$32,682.35, and manufacturing time for each valve is estimated at 4-6 weeks after engineering approval. The product is manufactured with cast iron (20" valves) or ductile iron (30" and 36" valves) body and disc, 304 stainless steel shaft, and 304 stainless steel vane seat ring with vulcanized EPDM rubber.

The City of Kingsport made a good faith effort to solicit bids for domestic iron and steel products as demonstrated in the attached text from the Contract Documents. Also attached is the project specification section for butterfly valves.

Efforts to procure products that conform to the project technical and schedule requirements that meet the requirements of AIS have been unsuccessful. Manufacturers of butterfly valves would need to identify, proof, and test newly sourced materials to ensure butterfly valves operate correctly. Manufacture of butterfly valves for this project in full compliance with AIS and the project specifications is estimated at 22-30 weeks for design, sourcing, and manufacturing and a total cost of \$68,211.76. Documentation of AIS noncompliance from other valve suppliers within the specific size range has also been attached.

AIS Waiver Request.docx



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City of Kingsport, Tennessee

Similar availability waivers of AIS requirements for large butterfly valves have been approved for projects in California, South Dakota, and Washington.

Sincerely,

John Clark, Mayor
City of Kingsport

cc: Niki Ensor, City of Kingsport
Daniel Unger, CDM Smith
Josh Norton, CDM Smith

This waiver request was submitted to the EPA by the state of Tennessee. 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 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.