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February 11, 2016

Mr. Phillip Akin  
Drinking Water  
Financial Assistance Center  
Missouri Department of Natural Resources  
1101 Riverside Drive  
Jefferson City, MO 65101

RE: Public Interest Waiver of American Iron and Steel (AIS) Requirements to the City of  
Bonne Terre, Missouri for 12-inch Cut-In Valve

Dear Mr. Akin,

The City of Bonne Terre, Missouri is requesting a public interest waiver for the 12-inch cut-in valve installed at the Mansion Hill Tank site. According to the memorandum titled, "Implementation of American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act, 2014", a waiver may be requested if complying with these requirements would be inconsistent with the public interest. The following is justification for our request.

During attempt to isolate the Mansion Hill Tank for painting it was found the existing gate valve was defective. Normal procedures for replacing the valve would require shutting down a section of City, thus leaving residents without water for an extended time. The most cost effective and quickest way was to use a cut-in valve that can be installed in a few hours. It was critical to paint tank prior to winter months to avoid a 5 month delay on project and to avoid an added Contractor's mobilization/demobilization cost.

We concur with Brockmiller Construction for use of a cut-in valve to prevent water service interruption to local residents. The Contractor selected a non-compliant AIS valve with 1 day lead time versus a compliant AIS valve at 6 weeks to maintain construction schedules and prevent delay of tank painting. The 12 inch Insta-Valve is manufactured by Hydra-Stop. Hydra-Stop was able to quickly respond to meet project deadlines. Their supplied valve meets AIS compliance for all materials with exception to the blind flange and weldneck. The value of the blind flange and weld neck comprise less than 5% of the value of the entire 12" Insta-Valve assembly. This valve is less than 1% of the total project costs. Refer to attached manufacturer's letter for material and delivery schedule details.



It is our opinion it is in the best interest of the City for a waiver to be granted for the above described valve. The valve was selected to provide the best cost effective solution and to provide non-disruptive water service to the customers of Bonne Terre.

Sincerely,

Tim Straszacker, P.E.  
Design Engineer

Attachments:

cc: Darleen Groner  
Jim McCleish

**This waiver request was submitted to the EPA by the state of Missouri. 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](mailto:SRF_AIS@epa.gov).**