



# City of Avenal

919 Skyline Blvd.  
Avenal, CA 93204  
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April 21, 2021

California State Water Resources Control Board

Attn: Pete Stamas, P.E.

Office of Sustainable Water Solutions

1001 I Street Sacramento, CA 95814

**SUBJECT:** Request for Wavier of AIS Provision for Triple Offset Butterfly Valves for the  
City of Avenal – 18” Water Transmission Replacement Pipeline Project,  
Avenal, California – Drinking Water State Revolving Fund (DWSRF) –  
Project No. 1610002-002P

Dear Mr. Stamas:

The City of Avenal (City) requests that a product –specific project wavier of American Iron and Steel (AIS) provisions be provided for the nine (9) each triple offset butterfly valves to be installed as part of the City of Avenal – 18” Water Transmission Replacement Pipeline Project (18” Water Pipeline). In accordance with the U.S. Environmental Protection Agency (USEPA) memorandum, implementation of the American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act 214, the information required for a waiver to be processed is included below and in the attached documents.

## **Project Background**

The City is a public agency responsible for providing safe drinking water to its customers. The City treats raw water from the California Aqueduct at two (2) surface water treatment



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plants (SWTP). The City delivers treated water to the community through a twelve (12) inch and eighteen (18) inch pipeline for an approximate length of 7.7 miles or 40,500 feet. The eighteen (18) inch pipeline installed in 1986 was a steel pipeline with interior coating and tape wrapped. Over the last ten (10) years it has experienced 100's of pipeline leaks due to corrosion of the bonding jumpers and other miscellaneous reasons. The City is planning to replace the worst section of the pipeline for approximately 3.2 miles or 16,740 feet. The pipeline is designed for a 1,422 feet (500 psi) lift from the Surface Water Treatment Plant (SWTP) to the 3 million gallon steel water storage tank. Two (2) sections of the proposed pipeline have a design pressure of 400 psi and 500 psi. The maximum pressure of the America Water Works Association (AWWA) C-504 is 350 psi. We have included the Pratt HP-350 Butterfly Valve information rated at 350 psi (See Attachment A). The proposed butterfly valves shall meet the requirements of the National Sanitation Foundation (NSF). [REDACTED] triple offset butterfly valves that meet this design pressure and NSF requirements. In these two pipeline sections we need the following butterfly valve sizes, pressure ratings with appurtenant information:

1. 4" Triple Offset Butterfly Valves, 400 psi, with hand wheels for operation – 4 each.
2. 6" Triple Offset Butterfly Valves, 500 psi, with 2" square operating nut – 1 each.
3. 18" Triple Offset Butterfly Valves, 400 psi, with 2" square operating nut – 3 each.
4. 18" Triple Offset Butterfly Valves, 500 psi, with 2" square operating nut – 1 each.

### **Triple Offset Butterfly Valves**

The triple offset butterfly valves are designed to meeting the 400 psi and 500 psi pressure and NSF requirements. [REDACTED]

[REDACTED]

[REDACTED]



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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

The triple offset butterfly valve is designed to have its valve disc only make contact with the seat ring at full closure so that there is no sliding, rubbing or grinding between the two mechanical components. This reduces the wear on the valve and leakage, thereby reducing maintenance problems. The triple offset butterfly valve is designed for zero leakage. [REDACTED]

[REDACTED] ([REDACTED])

[REDACTED].

## Available Waiver Request

The City of Avenal has provided a good faith effort to find butterfly valves meeting the 400 psi and 500 psi design pressure requirements but constructed within the USA without success. There are no known domestic manufactures produce a product that meets the projects technical specifications. In recent years, the EPA has issued waivers for such valves to City of Santa Cruz (See Attachment F), Orange County Water District (See Attachment G), the Sacramento Regional Water Authority (See Attachment H) and the Western Municipal Water District of Riverside City and County (See Attachment I).

The City of Avenal requests a waiver be issued to allow the use of the proposed triple offset butterfly valves on its 18" Water Transmission Replacement Pipeline Project.



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If you have any questions or need additional information, please contact Brian Skaggs, City Engineer and Project Engineer, Summers Engineering, Inc. - (559) 582-9237 or [bjs@summerseng.com](mailto:bjs@summerseng.com).

Thank you,

Antony V. López, City Manager  
City of Avenal

This waiver request was submitted to the EPA by the state of California. All supporting correspondence and/or documentation from contractors, suppliers or manufacturers included as 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 [DWSRFWaiver@epa.gov](mailto:DWSRFWaiver@epa.gov).

### Attachments:

- [REDACTED]
- [REDACTED]
- [REDACTED] – Triple Offset Butterfly Valve – Catalog Information
- [REDACTED] – Triple Offset Butterfly Valve – Company Information and User List
- [REDACTED]
- [REDACTED]
- F - Copy of the City of Santa Cruz – EPA AIS Waiver Decision
- G - Copy of the Orange County Water District – EPA AIS Waiver Decision
- H - Copy of the Sacramento Regional Water Authority – EPA AIS Waiver Decision
- I - Copy of the Western Municipal Water District – EPA AIS Waiver Decision

cc: Kao Nou Yang, City of Avenal – Planning Department  
Rob Williams, City of Avenal – Public Works Director  
Scott Davis, City of Avenal – Public Works Supervisor  
Brian Skaggs, Summers Engineering, Inc. – City Engineer and Project Engineer

[REDACTED]

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VALVES.

.1 BUTTERFLY VALVES. Butterfly valves shall conform to the applicable provisions of AWWA C-504. All butterfly valves shall be flanged (short body), and not of the wafer type. The pressure rating for butterfly valves shall be Class 150, Class 250, Class 350, Class 400 and Class 500 as shown on the Drawings. All butterfly valves located above ground shall be furnished with removable hand wheels. All butterfly valves located below the ground surface shall be furnished with square operating nuts, and shall have coal tar coating in accordance with the applicable provisions of AWWA C-203. All interior and exterior surfaces of the valves shall be coated with the applicable provisions of AWWA C-550 for potable water. The butterfly valves through Class 350 [REDACTED]

[REDACTED]. The butterfly valves for Class 400 and Class 500 shall be zero leakage metal seated triple offset butterfly valves with two-year warranty

[REDACTED].

[REDACTED]

.2 INSTALLATION. The valve installation shall be complete with all flanges, gaskets, bolts, double washers, nuts and all else required to complete the valve in a watertight condition. The valves shall be furnished with companion flanges and a concrete support block. Upon completion of the butterfly valve installation the entire connection shall be wrapped with 20 mil. Polyethylene plastic sheets and the ends shall be wrapped with 20 mil. tape.

.3 PAYMENT. Payment will be made for the installation of butterfly valves at the applicable unit price bid therefore in the Schedule. The installation price shall include all materials and labor, including valve access wells where required, fabricating, furnishing, trenching, placing, backfilling, companion flanges, bolts, double washers, nuts, 20 mil. polyethylene sheets, 20 mil. tape, concrete support block, testing, guaranty and maintenance and all the work required to complete the butterfly valve installation as shown on the drawings.

[REDACTED]

[REDACTED]