



NOTE: The 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 CWSRFWaiver@epa.gov.



February 24, 2021

U.S. EPA
Office of Wastewater Management

RE: Request for Waiver of AIS Provisions for Small-Bore Stainless-Steel Piping for the San Luis Obispo Water Resource Recovery Facility (SLO WRRF) Project No. 5403168

To the California State Water Resources Control Board,

PCL Construction, Inc. is requesting that a product-specific project waiver of AIS provisions be issued for 1-inch to 4-inch diameter SCH10, SCH40, and 150# stainless steel pipes and fittings for the construction of the upgrade of the San Luis Obispo Water Resource Recovery Facility. In accordance with the United States Environmental Protection Agency (USEPA) memorandum, Implementation of American Iron and Steel Provisions of P.L. 113-76, Consolidated Appropriations Act of 2017, the information required for a waiver to be processed is included below and in the attached documents.

Project Background

The San Luis Obispo Water Resource Recovery Facility project "SLO Water Plus" will improve the plant's ability to recover wastewater resources while also reducing reservoir and groundwater supply dependencies.

The installation of the small-bore stainless-steel pipes and fittings will be used on the following systems: air low pressure, air scour, supplemental carbon, digester gas, digested sludge, dewatering filtrate, fire system service, hydrogen peroxide, irrigation, mixed liquor, primary influent, permeate, primary sludge, thickened sludge, waste activated sludge, and non-potable water.

Multiple manufacturers and suppliers for the small-bore stainless-steel pipes and fittings have indicated that they are not able to meet the project specifications and the AIS provisions. These products are not produced in the U.S. in enough available quantities or of satisfactory quality to meet the project's needs.

General

The project's stainless-steel piping specifications are in Attachment No. 1

The project needs forty (40) 1-inch SCH40 pipes, sixty (60) 2-inch SCH40 pipes, three hundred eighty (380) 3-inch SCH10 pipes, twenty (20) 4-inch SCH10S pipes, seven (7) 1-inch fittings, ten (10) 2-inch fittings, seventeen (17) 3-inch fittings, two (2) 4-inch fittings, and five (5) various-sized nipples. For a total cost of [REDACTED]. See Attachment No. 2 for a detailed quantity breakdown and pricing, and Attachment 3 for the submittal regarding the stainless-steel small-bore pipes and fittings.

The project will need the pipes and fittings on or before June 15, 2021 to meet the planned start of Pressure Testing on August 21, 2021 for a projected Project Completion Date of September 8, 2023.

PCL Construction, Inc.

[REDACTED]
[REDACTED]

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CONSTRUCTION

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The conformed site drawings for the fittings are in Attachment 4.

Location of construction project:

SLO WRRF

[REDACTED]
[REDACTED]

Name and address of the proposed supplier:

[REDACTED]
[REDACTED]
[REDACTED]

Availability Waiver Request

PCL Construction, Inc. tried to solicit bids for domestic iron and steel products, as demonstrated in requests for proposals, contracts, and communications with the primary contractor, [REDACTED]

[REDACTED]

[REDACTED] contacted the following manufacturers about the availability of the specified pipes and fittings.

- [REDACTED]
- [REDACTED]

None of the manufacturers contacted could domestically source the pipes and fittings in accordance with the contract requirements. Refer to Attachment 5, the letter from [REDACTED] containing the list of manufacturers contacted and their responses.

If you have any questions, please contact Olivia Weinbaum, Field Engineer Intern, [REDACTED]

[REDACTED]

Yours truly,

Olivia S. Weinbaum
Field Engineer Intern
PCL Construction, Inc.

Attachments: Attachment 1 – Spec 40 27 00 Process Piping
Attachment 2 – SS Material Pricing and Quantities
Attachment 3 – Small Bore SST Pipe and Fittings Submittal
Attachment 4 – SST-Specific Conformed Site Drawings
Attachment 5 – SS Material Letter

cc: Jon Merryman, PCL Construction, Inc.
Jacob Hagman, PCL Construction, Inc.
Thomas Bussell, PCL Construction, Inc.
Jeremy Chavis, PCL Construction, Inc.
Maria Alvarado, PCL Construction, Inc.
[REDACTED]