

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner



Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

February 14, 2014

Environmental Protection Agency Region 1
Katie Marrese, Environmental Engineer
5 Post Office Square, Suite 100
OEP06-2
Boston, MA 02109

Subject: Public Interest Waiver Request from Use of American Iron and Steel Requirement in H.R. 3547

Dear Ms. Marrese:

On behalf of the Public Water Systems that have submitted Drinking Water State Revolving Fund (DWSRF) applications to the Department of Public Health (DPH) for financing emergency generator projects, the Drinking Water Section (DWS) is respectfully requesting a public interest waiver under H.R. 3547 Division G Title IV Section 436(b)(1) from the Use of American Iron and Steel requirement. Attached is a list of the 55 projects for which this waiver request is being submitted.

All of the projects identified on the attached list are currently ready for contractors to prepare price quotes on or are ready to go out for public bidding if this waiver request is approved. These are relatively short duration low cost projects that will be completed quickly, most within 1 week after work is started. At this time, the total cost of all 55 projects is estimated to be \$2,700,000 with an average cost of less than \$50,000 per project.

The typical steel and iron products that may or are likely to be encountered with these projects include, but are not limited to:

- Steel fuel tanks (propane in most cases with prices ranging from approximately \$1300 for a 250 gallon tank to \$3100 for a 1000 gallon tank)
- Corrugated Stainless Steel Tubing (CSST) or cast iron fuel lines from the fuel tank to the generator (less than 50 ft length and approximately 1 inch diameter – low cost)
- Precast reinforced concrete generator pads (typical price range \$1200-\$1500)
- Wire mesh or rebar (reinforcement for poured in place generator pads – low cost)
- Miscellaneous steel electrical components (conduit, junction boxes, fittings, etc. – low cost)
- Miscellaneous screws, bolts, nuts, clamps, etc. (low cost)



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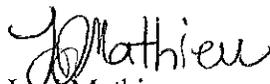
Based on the information that the DPH has received from EPA Region 1, it appears likely that there will be a “de minimus” allowance for up to 5% of the total material cost for non-compliant steel and iron products in the final EPA guidance. The DWS believes that all of the steel and iron components listed above, with the possible exception of the fuel tanks and precast reinforced concrete generator pads, would likely represent less than 5% of the total material cost of each project. The bulk of the cost for these projects would be for the generator, electrical wiring, automatic transfer switch and necessary upgrades to existing service panels. These higher cost products do not fall under the Use of American Iron and Steel requirement.

Connecticut has experienced several extreme weather events over the past 3 years that left many customers of small PWSs without water service for extended periods of time due to power outages. The first two storms alone affected the operations of a total of 214 small PWSs. Boil water advisories were issued to residents of PWSs that lost water service until water pressure was restored and water quality testing determined that the water was safe for consumption. The 55 projects for which this waiver is being requested will help to ensure that a continuous supply of clean and safe drinking water is provided to many of these Connecticut residents. The public health benefit of maintaining a supply of safe drinking water during an emergency or extreme weather event is immeasurable.

Due to uncertainty with the availability of the final EPA guidance associated with the Use of American Iron and Steel provision, the DWS does not want to delay these important, low cost projects that will provide emergency stand-by power to critical public drinking water facilities. The compliance documentation requirements in the final EPA guidance are not available at this time and contractors will need this information prior to ordering any materials for these projects.

If you have any questions or need additional information to support this waive request please do not hesitate to contact Cameron Walden at (860) 509-7333.

Sincerely,



Lori Mathieu
Public Health Section Chief
Drinking Water Section

**Connecticut Department of Public Health
Drinking Water State Revolving Fund - Emergency Power Generator Projects**

Project #	PWSID	PWS Name	City served	Total Amount Requested
2013-0061	CT0030061	MAR-LEA PARK APARTMENTS	ASHFORD	\$12,000
2013-0067	CT0030051	WOODLAWN APARTMENTS	ASHFORD	\$12,000
2013-0053	CT0640011c	MDC - BARKHAMSTED HQ	BARKHAMSTED	\$150,000
2013-0090	CT0110031	SHARON HEIGHTS ASSOC	BLOOMFIELD	\$14,000
2013-0086	CT0180161	WHISCONIER VILLAGE	BROOKFIELD	\$50,000
2013-0095	CT0270041	EVERGREEN TRAILER PARK #1	CLINTON	\$25,000
2013-0096	CT0270091	EVERGREEN TRAILER PARK #2	CLINTON	\$25,000
2013-0097	CT0270101	EVERGREEN TRAILER PARK #3	CLINTON	\$25,000
2013-0098	CT0270111	EVERGREEN TRAILER PARK #4	CLINTON	\$30,000
2013-0051	CT0640011a	MDC - NEPAUG DAM	COLLINSVILLE	\$180,000
2013-0182	CT0320171	COVENTRY HOUSING AUTHORITY	COVENTRY	\$23,000
2013-0082	CT0320091	CTWC - COVENTRY HILLS	COVENTRY	\$32,500
2013-0073	CT0330011	CROMWELL FIRE DISTRICT	CROMWELL	\$250,000
2013-0042	CT0340111	AQUA VISTA - UPPER	DANBURY	\$10,000
2013-0043	CT0347051	AQUA VISTA - LOWER	DANBURY	\$12,000
2013-0044	CT0380041	STONEGATE SPRINGS	DURHAM	\$45,000
2013-0038	CT0400051	OLD NEWGATE RIDGE	EAST GRANBY	\$45,000
2013-0060	CT0480081	MEADOW BROOK APARTMENTS	ELLINGTON	\$12,000
2013-0064	CT0490021b	HAZARDVILLE WC - AVERY WELLS	ENFIELD	\$145,000
2013-0063	CT0490021b	HAZARDVILLE WC - TOWN FARM WELL	ENFIELD	\$80,000
2013-0104	CT0930011a	SCCRWA - COBBLESTONE DR	HAMDEN	\$45,000
2013-0062	CT0670041	HEBRON ARMS APARTMENTS	HEBRON	\$12,000
2013-0091	CT0671021	WELLSWOOD ESTATES	HEBRON	\$12,000
2013-0099	CT1040011a	NPU - RESERVIOR RD 1	LEBANON	\$231,900
2013-0102	CT1040011e	NPU - RESERVIOR RD 2	LEBANON	\$78,690
2013-0069	CT0720041	SCWA - FERRY VIEW DIVISION	LEDYARD	\$33,000
2013-0087	CT0720101	ASH WATER COMPANY	LEDYARD	\$7,000
2013-0092	CT0731021	ROUND HILL APARTMENTS	LISBON	\$12,000
2013-0066	CT0780131	WOODEDGE APARTMENTS	MANSFIELD	\$12,000
2013-0068	CT0780041	WHITE OAK CONDO	MANSFIELD	\$10,000
2013-0083	CT0790021	HILLSIDE WATER CORP	MARLBOROUGH	\$12,000
2013-0037	CT0800011	MERIDEN WATER DIVISION	MERIDEN	\$225,000

Connecticut Department of Public Health
 Drinking Water State Revolving Fund - Emergency Power Generator Projects

Project #	PWSID	PWS Name	City served	Total Amount Requested
2013-0049	CT0815051	MIDDLEBURY COMMONS	MIDDLEBURY	\$15,000
2013-0047	CT0861111	FOX LAUREL MHP	MONTVILLE	\$22,000
2013-0065	CT0860051	DEER RUN WATER SUPPLY	MONTVILLE	\$8,000
2013-0071	CT0860081	SCWA - CHESTERFIELD DIVISION	MONTVILLE	\$33,000
2013-0070	CT0860011	SCWA - MONTVILLE DIVISION	MONTVILLE	\$33,000
2013-0100	CT1040011c	NPU - FRANCES ST	MONTVILLE	\$88,890
2013-0101	CT1040011d	NPU - CHERRY LANE	MONTVILLE	\$172,425
2013-0048	CT0878011	BREEZY KNOLL ASSOC	MORRIS	\$15,000
2013-0058	CT0970512	CEDARHURST ASSOC	NEWTOWN	\$15,000
2013-0105	CT0930011b	SCRWA - LINSLEY LAKE RD	NORTH BRANFORD	\$47,000
2013-0040	CT0990031	NORTHFORD GLEN CONDO	NORTH BRANFORD	\$22,000
2013-0088	CT1040091	SUNNY WATERS MHP	NORWICH	\$7,000
2013-0094	CT1040011b	NPU - WEST TOWN ST	NORWICH	\$76,225
2013-0039	CT1099141	ARNIO DRIVE	PLAINFIELD	\$5,000
2013-0050	CT1120264	WINDHAM 4H CAMP	POMFRET	\$24,500
2013-0085	CT1210011	SALEM MANOR 1	SALEM	\$60,000
2013-0084	CT1211911	SALEM MANOR 2	SALEM	\$60,000
2013-0059	CT1420021	BAXTER FARMS	TOLLAND	\$30,000
2013-0072	CT1501111	RUMSEY HALL SCHOOL	WASHINGTON	\$1,800
2013-0093	CT1620011	WINSTED WATER WORKS	WINCHESTER	\$49,000
2013-0046	CT1680021	TOWN IN COUNTRY CONDO - UPPER	WOODBURY	\$20,000
2013-0089	CT1680041	QUASSUK HEIGHTS GARDENS	WOODBURY	\$25,000
2013-0045	CT1686091	TOWN IN COUNTRY CONDO - LOWER	WOODBURY	\$20,000
TOTAL				\$2,672,930