

American Iron and Steel (AIS) Project Specific Waiver Request

Franklin WRF Modifications & Expansion Project
City of Franklin, TN

The City of Franklin, Tennessee (Loan Recipient) and Kiewit Infrastructure South Co, (KISC) (General Contractor) are requesting a project specific waiver for flexible split ring couplings for the construction of Franklin WRF Modifications & Expansion Project in Franklin, TN. A project specific waiver is being requested for certain flexible split ring couplings for the project due to the lack of AIS compliant products in the market that will meet the requirements of the project specifications in the time the products are required by the project CPM schedule for installation.

Project Background

The Franklin WRF is a wastewater treatment facility located in Franklin, TN. The project includes modifications and expansion of the existing facility as well as a new Biosolids Treatment Facility. The flexible split ring couplings that are included in this waiver request are associated with the pre-dewatering centrate drain HDPE pipes that are downstream of two equipment; pre-dewatering centrifuges and post-dewatering screw presses that are being provided as a part of the project.

Requests have been sent to many suppliers asking for quotes for the specified flexible split ring couplings and none were able to supply couplings that meet both AIS compliance requirements and the requirements of the project's specifications. The suppliers that Kiewit has contacted are: Romac Industries, JCM Industries and Smith-Blair. The correspondence in attachment E concludes that AIS compliant valves are not available in the market with a lead time for delivery that will accommodate the project's schedule.

In accordance with the EPA memorandum, Implementation of American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act, 2014, the information required for the project specific waiver is enclosed.

Attachment A: Checklist

Attachment B: List of material with costs

Attachment C: Specifications and Drawings

Attachment D: Project Schedule

Attachment E: Correspondence with the EPA and Suppliers

NOTE:

This waiver submission may include references to proprietary items and brand name products. These references have been retained in order to provide context for the waiver submission. EPA does not evaluate a waiver based on a proprietary item but reviews the performance-based specifications for the project/products. As such, any references to brand or proprietary items are reviewed on an "or equal" basis by EPA.

Items and pages may have been intentionally redacted or excluded by the EPA. Contact CWSRFWaiver@epa.gov for more information if necessary.

Appendix 1: Information Checklist for Waiver Request

The purpose of this checklist is to help ensure that all appropriate and necessary information is submitted to EPA. EPA recommends that States review this checklist carefully and provide all appropriate information to EPA. This checklist is for informational purposes only and does not need to be included as part of a waiver application.

Items	✓	Notes
General		
- Waiver request includes the following information: - Description of the foreign and domestic construction materials - Unit of measure - Quantity - Price - Time of delivery or availability - Location of the construction project - Name and address of the proposed supplier - A detailed justification for the use of foreign construction materials - Waiver request was submitted according to the instructions in the memorandum - Assistance recipient made a good faith effort to solicit bids for domestic iron and steel products, as demonstrated by language in requests for proposals, contracts, and communications with the prime contractor		
Cost Waiver Requests		
- Waiver request includes the following information: - Comparison of overall cost of project with domestic iron and steel products to overall cost of project with foreign iron and steel products - Relevant excerpts from the bid documents used by the contractors to complete the comparison - Supporting documentation indicating that the contractor made a reasonable survey of the market, such as a description of the process for identifying suppliers and a list of contacted suppliers		
Availability Waiver Requests		
- Waiver request includes the following supporting documentation necessary to demonstrate the availability, quantity, and/or quality of the materials for which the waiver is requested: - Supplier information or pricing information from a reasonable number of domestic suppliers indicating availability/delivery date for construction materials - Documentation of the assistance recipient's efforts to find available domestic sources, such as a description of the process for identifying suppliers and a list of contacted suppliers. - Project schedule - Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials - Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought - Has the State received other waiver requests for the materials described in this waiver request, for comparable projects?		

Size	Description	Quantity	Cost	Total Cost
4	Victaulic Coupling 905	24	■	■
6	Victaulic Coupling 905	48	■	■
8	Victaulic Coupling 905	50	■	■
10	Victaulic Coupling 905	3	■	■
12	Victaulic Coupling 905	15	■	■
				■

- b. Each harness shall have a minimum of two 5/8-in diameter bolts.
- 6. Unless otherwise specified with the individual type of pipe, sleeve couplings (mechanical couplings) shall be Victaulic Style 230/230S (formerly Depend-O-Lok ExE unrestrained) or Victaulic Style 232/232S (formerly Depend-O-Lok FxF self-restrained); ITT (formerly Smith Blair) Style 411; Dresser Style 38, similar models by Baker or equal, with the pipe stop removed.
- 7. Similar insulation type couplings shall be provided at the face of buildings, between different type metals or where otherwise noted.
- 8. In addition to those locations noted on the Drawings, sleeve couplings shall be provided on all piping where it connects with a structure or buried directly under a structure at the structure's expansion joints. Special treatment will be required where pipe is encased in concrete, utilizing minimum 3-in thick styrofoam placed perpendicular to the horizontal centerline of the coupling.

B. Split or Grooved Couplings

- 1. Split couplings shall be cast in two or more parts. When secured together with ASTM A183 bolts and nuts, couplings shall engage grooved or shouldered pipe ends and encase an elastomeric gasket to create a pipe seal. Gasket material shall be as recommended by the manufacturer for the service required.
- 2. Split couplings shall be as manufactured by Victaulic Company of America or equal. Numbers below refer to Victaulic Co. items, for reference only.
- 3. Unless otherwise specified with the individual type of pipe:
 - a. Flexible split ring couplings shall be:
 - 1) grooved ends - Style 77 (for steel/stainless steel) or Style 31 (for grooved ductile iron) or Style 908 (for HDPE pipe diameters 10" and larger) or Style 908 (for HDPE pipe diameters 10" and larger)
 - 2) shouldered ends – Victaulic Style 44 or Fluid Master
 - 3) fixed ends – Victaulic Style 232/232S (formerly Depend-O-Lok FxF)
 - 4) plain end HDPE pipe – Style 905 (for pipe diameters up to 8")
 - b. Rigid split ring couplings shall be:
 - 1) grooved ends - rigid groove with Style 31 couplings on ductile iron 36-in and smaller diameter with sufficient wall thickness per AWWA C606, or manufacturer's recommendation, or standard groove with Style 07 Zero-Flex coupling on manufactured steel or IPS pipe.
 - 2) shouldered ends – Style 44 coupling on ductile iron over 36-in diameter or without sufficient wall thickness per AWWA C606 or on manufactured steel pipe or thin wall stainless steel pipe. Field welding of shoulders of ductile iron pipe is specifically prohibited.