

REQUEST FOR A WAIVER FROM THE AMERICAN IRON AND STEEL REQUIREMENT

This request for a waiver from the American Iron and Steel requirement was completed with the Town of Frankton and its consultants to document a need to use foreign made iron/steel component and verify that the conditions of Section 436 are met.

This waiver request is necessary due to (highlight):

- Public Interest (complete sections A and B below)
- Availability (complete sections A and C below)
- Cost (complete sections A and D below)

Section A – General

Describe the unit process which contains the proposed foreign-made iron/steel component.

The Town of Frankton closed a \$9,355,000 loan with the DWSRF loan program on June 28, 2024, to install new water main, complete improvements at the water treatment plant installation of a new well, and to complete improvements at existing wells (including new pumps and electrical controls improvements)

To complete the pump improvements at Well #4, the project required one 6" inline check valve. Non-domestic valves meeting the project specification can be secured within 12 weeks. The purchase of non-domestic valves will reduce project delays, protect critical infrastructure, and meet the needs of the project.

The Town's supplier [REDACTED] in Indianapolis) has contacted [REDACTED] in search of an inline check valve and has not been able to identify a domestic option that will meet the specification (attached).

Section B – Public Interest (N/A)

Why is the use of the product in the public interest? For example, is the use of a foreign made iron/steel component necessary because of compatibility with existing components in the wastewater system or other reason?

Section C – Availability

Describe requirements in the project plans, specifications or permits which describe the required quantity and quality of the product:

Frankton's supplier approached four material suppliers to purchase a domestic 4" inline valve. These manufacturers cannot meet the required timeline of the project.

- Product requirements: Specifications for the 6" inline valve are attached to this document and summarized here:

2. In-Line Check Valve – Well discharge drop pipe shall be fitted with an in-line check valve constructed of lead-free brass, stainless steel, or aluminum, with female by female NPT pipe threads. Check valves shall be provided at one per 100 ft. (minimum of two check valves to be provided per well for redundancy; spaced as recommended by well pump installer). In-line check valve to [REDACTED]; or equal.

4. An integral check valve shall be furnished within the drop pipe assembly spaced at 100 ft. maximum (minimum of 2 check valves to be provided regardless of column length).

- Quantity: One
- Domestic: unavailable
- Nondomestic:

[REDACTED]

2. In-Line Check Valve – Well discharge drop pipe shall be fitted with an in-line check valve constructed of lead-free brass, stainless steel, or aluminum, with female by female NPT pipe threads. Check valves shall be provided at one per 100 ft. (minimum of two check valves to be provided per well for redundancy; spaced as recommended by well pump installer). In-line check valve to [REDACTED]; or equal.

Section D – Cost (N/A)

Cost of project with domestic components \$_____

Cost of project with foreign made components \$_____

Will the use of domestic components increase the project cost by more than 25%?

___Yes ___No

If No, cost is not a valid basis. If Yes, attach a detailed cost comparison of the domestic and foreign made options.

This waiver request was submitted to the EPA by the state of Indiana and applies only to the project in the subject line. 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. There may be documents with project diagrams, schedules, and supplier correspondence 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.