



October 17, 2024

VIA EMAIL

United States Environmental Protection Agency

**Subject: Imlay Water System Improvements – Phase 1
(DW2319 / PWP-PE-2024-182)**

To Whom It May Concern:

On behalf of Pershing County, please accept our AIS Waiver Request for the Imlay Water System Improvements – Phase 1 project. The project includes the construction of a 134,000-gallon welded steel storage tank including site access, grading, perimeter fencing, mechanical, electrical, SCADA, and installation of 8-inch diameter PVC potable water pipe; as well as the inspection and rehabilitation of two existing wells, the replacement of a well pump and motor and electrical upgrades to the well house. The project contract totals \$ [REDACTED]. We are seeking a waiver from the American Iron and Steel requirements for 4-inch check valves due to the lack of availability of a suitable option. There are 2 check valves included in this project, making up approximately \$ [REDACTED] (Attachment C) of the contract total.

We utilized the assistance of the EPA to attempt to locate a domestic option for the 4-inch check valves required for this project. The EPA located one possible supplier, [REDACTED]. We contacted [REDACTED] (Attachment A) to request more information on the options available. [REDACTED] stated that the domestic 4-inch check valve they have available is flanged and has a lead time of 14-16 weeks.

According to [REDACTED] (subcontractor), a flanged check valve will not work well for this project (Attachment B). Also, the project schedule requires the check valves to be on-site in November 2024, so the provided 14-16-week lead time would not work well with the project timeline.

If any additional information is needed, please reach out to our Project Engineer, Hunter Pinto, P.E. with DOWL (hpinto@dowl.com).

Thank you for your assistance.

Sincerely,

Hunter Pinto, P.E.
DOWL

This waiver request was submitted to the EPA by the state of Nevada 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.

Attachment(s): Waiver Request Backup Documentation

G. Pitless Unit Dimensions

Min Can Diameter, inch	12" X 14"
Total Can Length, inch	As required for installation depth
Inlet Connection Size, inch	4" NPT
Discharge Connection Size, inch	4" or 6" 150# flange
Materials	Heavy duty gray iron, ductile iron or steel. All water passages shall be hot dip galvanized with lead free zinc.

H. Manufacturers

1. The Pitless Unit shall be a Standard Pitless Unit, Supplied by [REDACTED] or approved equal.

2.04 WELL DROP PIPE

- A. The pump discharge drop pipe shall be 4" diameter schedule 40, threaded stainless steel. The pipe shall be furnished in interchangeable lengths of 10 feet with machined ends of 8-thread per inch, 3/16-inch taper per foot and standard sleeve-type couplings providing perfect alignment. Top and bottom sections shall be 5 feet in length. Wall thickness shall be minimum 0.280 inches.
- B. Drop pipe must be NSF 61 certified.

2.05 WELL ACCESSORIES

- A. Well Monitoring Tubes (sounder tubes): The pump column will be provided with one nominal 1.0-inch diameter PVC pipe of sufficient length to extend from the pump to the top of the well casing. The conduit shall be securely fastened with Type 316 stainless steel straps to the column pipe and care shall be exercised in lowering the pump assembly so that the conduit is not damaged.
- B. Check Valve: It is acceptable for pump to have built in check valve feature, in which case no additional inline check valve is necessary. If selected pump does not have integral check valve, inline check valve shall be installed. Check valve must be NSF 61 certified.
 1. Check valve body and follower to be constructed of stainless steel. Valve guide and spring constructed of 316 stainless steel. Maximum pressure rating to be 400 psi. All internal parts to be made from corrosion resistant material.
 2. Manufacturer: Inline check valve to be [REDACTED] stainless steel submersible check valve or approved equal.

2.06 ELECTRICAL

- A. Submersible pump cable