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February 4, 2025

Mr. Thomas Montgomery

Environmental Administrator – State Revolving Fund

3900 Commonwealth Blvd.

Tallahassee, FL 32399

**Re: 2023-ITB-168 - Glendale WRF Chlorine Contact Chamber and Effluent Pumping
Wye Strainer - AIS Waiver Request**

Mr. Montgomery,

The City of Lakeland is requesting a product-specific project waiver of American Iron and Steel (AIS) provisions to be issued for a two-inch, six-inch, and eight-inch flanged strainers for the Glendale WRF Chlorine Contact Chamber and Effluent Pumping Project (project number). 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, 2014, the information in support of this waiver request is summarized below and provided as attachments.

Project Background:

The Project is in the construction execution phase of work with procurement of equipment and materials ongoing. The existing facilities for pumping from the Glendale WRF are aging and have generally exceeded their useful life expectancy. This construction project will replace the existing effluent pumping facilities with a new chlorine contact chamber and effluent pumping facilities capable of pumping to Northside WRF or pumping to the Se7en Wetlands system. Also, a new electrical building, generator back-up power, and controls will be provided to support the proposed work. The Glendale WRF Chlorine Contact Chamber and Effluent Pumping Project (project number) has received SRF funding. This program includes provisions/requirements for compliance with the “American Iron and Steel” act. This provision requires recipients to procure and install iron and steel products produced in the United States.

Equipment/Material Availability:

The project involves installing four (4) two-inch, one (1) six-inch, and one (1) eight-inch flanged strainers, all of which are subject to AIS requirements. Three (3) two-inch strainers

will be installed on the chlorination lines feeding chlorine to the new chlorine contact chamber. One (1) two-inch strainer will be placed on the chlorination line supplying chlorine to the return flow from the Northside WRF. The six-inch strainer will be installed on the pipeline for the control valve station, and the eight-inch strainer will be used on the pipeline for the pressure-reducing station. These strainers are designed to prevent sediment accumulation in the pipelines for these systems. During the procurement of these components, the manufacturers and suppliers for the strainers have notified the construction team that they are unable to meet the provisions established by both the project specifications and the requirement to meet AIS certifications. The specified strainer needed to meet the project requirements and protect the process systems is not produced in the United States.

Supporting Documentation:

The General Contractor [REDACTED] noted that to their knowledge, wye strainers are not manufactured domestically to meet the AIS requirements. The contractor contacted [REDACTED] about the availability of the specified strainers. A letter provided to the contractor by the manufacturer noted that they are unable to provide strainers that meet the AIS requirement. See attachments for supporting documentation.

To maintain the construction project schedule, delivery of this component is required on or before July 1, 2025.

Project Location:

Glendale Water Reclamation Facility

1825 Glendale Street

Lakeland, FL 33803

Name and Address of Proposed Supplier:

[REDACTED]
[REDACTED]
[REDACTED]

Availability of Waiver Request:

The City of Lakeland and its construction team has made a good faith effort to solicit bids for domestic iron and steel products, as demonstrated by language requests for proposals, contracts, and communications with prime contractors.

Please note that the EPA has granted request for similar components, the supporting documentation of which is provided in the attachment.

Please let me know if you have any questions or require additional information.

Luther L. Potter, III

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- C. All valve boxes shall be 2-piece cast iron, sliding type, 5-1/4" shaft, with heavy duty traffic weight collar and the lid marked with the appropriate carrier product (i.e.: WATER). Boxes shall be as manufactured by [REDACTED] or equal.

2.05 STRAINERS

- A. Y-Strainers 3" and smaller shall be Y-pattern cast iron body, flanged or screwed ends with stainless steel or [REDACTED], 20 mesh strainers. Strainers shall be 200 psi, cold-water service strainers, as manufactured by [REDACTED] or equal.
- B. PVC and CPVC y-strainers shall be provided in PVC and CPVC piping and as shown on the Drawings. Strainer shall be provided with PVC or CPVC body and end cap, EPDM or [REDACTED] seal as required for the chemical service, and 20 mesh screen. Temperature rating shall be 30°F to 140°F, and pressure rating shall be 150 psi @ 70°F, non-shock. PVC and CPVC y-Strainers shall be as manufactured by [REDACTED] or equal.
- C. Strainers for Control Valve and Pressure Reducing Valve Station
1. Strainers 4 inches and larger shall be constructed of a ductile iron body with flanged end connections rated for 250 psig.
 2. Strainer shall have 10 mesh internals constructed of 316 SS with a Cv of at least 700.
 3. Strainer shall have a fusion bonded epoxy coating per the requirements of 09 90 00 Painting.
 4. Strainers shall have a drain / blow off port for use during maintenance activities.
 5. Strainers shall be as manufactured by [REDACTED] or equal.

2.06 BACKFLOW PREVENTERS

- A. Backflow preventer shall be the size shown on the Drawings and shall be of the double check valve principle. Backflow preventer installation shall include isolation valves and four test cocks, furnished as an assembly. For backflow preventers less than 2-1/2", the installation assembly also shall include a strainer. Isolation valves for backflow preventers shall be ball valves, except for size 2-1/2" and larger which shall be resilient seat gate valves. Test cocks shall be located as recommended by the manufacturer to facilitate functional testing of the assembly. The backflow preventer shall be a [REDACTED] or equal.
- B. Reduced Pressure Backflow Preventer shall be of the size shown on the Drawings and shall be of the reduced pressure principal type in accordance with AWWA Standards C510 and C511, with two (2) independent operating spring loaded check valves and one (1) spring loaded, diaphragm actuated, differential pressure relief valve shall be installed between the check valves. Backflow preventer shall be bronze body construction, with