

From: [REDACTED]
Cc: [REDACTED]
Subject: RE: Columbus Residuals Turnkey Dewatering Services Project (EPA Account # FS3902/4-0436)
Date: Tuesday, March 18, 2025 2:54:02 PM
Attachments: [AIS Waiver Request Attachments.pdf](#)
[ais_waiver_request_checklist.pdf](#)

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Hey [REDACTED]

As discussed last week and described below, the subject project is proposing to submit for a project waiver if the Backflow Prevention Assemblies are NOT considered "incidental" to the project. If the SRF considers the Backflow Prevention Assemblies incidental, please let me know.

Pertinent information for the project waiver request is attached and provided below. Please proceed with issuing the project waiver request.

GENERAL INFORMATION

- Project Location: City of Columbus, Ohio
- Name and Address of the Project: 2863 McKinley Ave, Columbus, OH 43204
- Description of the foreign and domestic construction materials: **Backflow Prevention Assembly Confirmed**
- Quantity – **Confirmed**

Product	Design Drawing	Location	Backflow Device Type	Number of Devices	Device Size (in)	PRICE	Delivery Lead Time	Supplier Name	Supplier Address
Backflow Prevention Assembly	P-02	Inside Dewatering Building	Reduced Pressure Zone Backflow Prevention Assembly	1	2 ½"	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Backflow Prevention Assembly	M-14	Inside Dewatering Building	Double Check Valve Backflow Prevention Assembly	1	8"	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

- A detailed justification for the use of foreign construction materials: The Design Build team of Synagro, Walsh, & Arcadis was unable to locate AIS compliant backflow prevention assemblies. The Design Build Team's suppliers, [REDACTED] and [REDACTED], responded stating they could not provide large diameter AIS compliant backflow prevention assemblies. And the manufacturer [REDACTED] also responded stating they could not provide large diameter AIS compliant backflow prevention assembly of that size and did not know of a manufacturer that could. The Design Build team also contacted [REDACTED], and was able to confirm that those manufacturers did not offer AIS compliant options for large diameter backflow preventers either. This observation is reinforced by existing approved EPA Project Waivers for other loan funded projects with Backflow Prevention Assemblies over 2" diameter. Documentation is attached. **CONFIRMED**
- Waiver request was submitted according to the instruction in the memorandum? **CONFIRMED**
- 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 Design-Builder? **CONFIRMED**

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: **AS INCLUDED**
 - Documentation of the assistance recipient's efforts to find available domestic sources, such as a description of the project for identifying suppliers and a list of contacted suppliers: **CONFIRMED**
 - Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials: **CONFIRMED**
 - Waiver request includes a statement from the DB Team Representative and/or supplier confirming the non-availability of the domestic construction materials for which the waiver is sought: **See attachment 3 CONFIRMED**
 - Has the State received other waiver requests for the materials for described in this waiver request for comparable projects? **No, but there have been similar requests for the materials described in this waiver for comparable projects in other states.**

Attachments

1. Correspondence from the DB and City Management Team looking for ways to resolve the issue.
2. Correspondence from the DB's material supplier regarding AIS compliance
3. Letter from Manufacturer [REDACTED] – includes subsidiaries [REDACTED]
4. Project technical specification for backflow prevention assemblies
5. Project plan sheets calling for use of backflow prevention assemblies
6. Product Literature from [REDACTED] for the proposed products that are not AIS compliant
7. Project Schedule

Feel free to call if you have any questions.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Friday, March 14, 2025 10:39 AM
To: [REDACTED]

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

2. [REDACTED]
3. [REDACTED]

I. Wall Hydrants:

1. [REDACTED].
2. [REDACTED]
3. [REDACTED]
4. Or approved equal.

J. Water Hammer Arresters:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. Or approved equal.

K. Backflow Preventer: Reduced Pressure Zone Assembly: 4 inches and larger:

1. [REDACTED]
2. [REDACTED].
3. Or approved equal.

L. Pressure Zone Assembly 3/4 inch to 3 inches:

1. [REDACTED].
2. [REDACTED].
3. Or approved equal.

M. Vacuum Breaker: Pressure Type:

1. [REDACTED].
2. Or approved equal.

N. Hose Reels:

- 1) Body: Cast iron, ASTM A126B with carbon steel plate cover.
- 2) Screen: Perforated plate, Type 304 or 316 stainless steel, 0.25 inch opening.
- d. Pressure Rating: 250 psi water service at 150°F.
- e. End Connections: Flanged, Class 125 FF.
- f. Size: 8-inch, unless otherwise shown on drawings.
- g. O-rings and seals: [REDACTED]
- h. Required accessories:
 - 1) Differential pressure switch and pressure gauge shall be as specified under Section 40 91 00, Primary Sensors and Field Instruments.

H. Backflow Preventer Assemblies:

1. Double Check Valve Backflow Preventers:

- a. Manufacturer and Model:
 - 1) [REDACTED]
 - 2) [REDACTED]
 - 3) Or approved equal
- b. Style: Reduced pressure principle with independent acting toggle lever check valves, approved for use by OEPA. Lead free construction.
- c. Components:
 - 1) Two (2) independently acting toggle lever check valves.
 - 2) Two (2) AWWA, O.S. and Y. gate valves for shutoff purposes.
 - 3) Four (4) test cocks.
- d. Construction: