



April 9, 2025

Build America, Buy America

Project-Specific Non-Availability Waiver Request

Project Name: Pomeroy High Pressure Zone Booster Pump Station

Loan Contract Number: DWL29304-0

Borrower: City of Pomeroy, WA

County and Municipality: Garfield Co., City of Pomeroy, WA

To Whom it May Concern,

Keller Associates, Inc (KA) provides engineering services to design, permit, and bid the High-Pressure Zone Booster Pump Station Project (Project) for the City of Pomeroy, WA (Owner). This Project is funded in part by Drinking Water State Revolving Funds and subject to Build America, Buy America (BABA) Act requirements. On behalf of the Owner, KA is requesting a project-specific non-availability waiver as described below. Per EPA guidance, this letter includes a project summary; description and explanation of waiver need; summary of due diligence; quantity and materials of products; specifications and design considerations; and approximate unit and project costs.

PROJECT SUMMARY

The Project consists of Construction of a new booster pump station as identified in the bid documents. The project is located near the intersection of South 18th St and Columbia Street in Pomeroy, WA. The work includes, but not limited to, procurement of project materials, erecting a CMU building, mechanical piping, pump installation, electrical, controls, site work, landscaping, permitting, coordination with agencies and utilities companies, and providing reports to applicable funding agencies.

The project construction cost is estimated at \$1,480,000.00.

DESCRIPTION AND EXPLANATION OF WAIVER NEED

KA and the City of Pomeroy, WA are requesting the following waiver and need:

Waiver Type: a nonavailability waiver due to manufactured product not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality.

Waiver Level and Scope: Project level waiver for a single project. No other project or award will utilize the waiver.

Waiver Description: Project-specific waiver of BABA requirements to the Owner for Pomeroy HPZ BPS Project for various products identified during design. Note that due to the complexity and timeline of this Project, future waivers may be identified and requested during construction:

Product	NAICS	PSC	Quantity	Unit Price
Butterfly Valve	332911	84818090	8	

SUMMARY OF DUE DILIGENCE

DW Excavating, Inc (contractor) has evaluated the above product for BABA compliance through examination of manufacturer catalogs, technical data, and marketing materials, and personal communication with various sales representatives and manufacturers. DWE's findings are summarized in the table below.

Product	Manufacturers	Response
Butterfly Valve		After reaching out to all butterfly manufacturers the vendor was getting the same message that they either don't make BABA compliant valves, or the lead time is long.

SPECIFICATIONS AND DESIGN CONSIDERATIONS

KA has enclosed specifications in this package for the above equipment. In addition, KA requests that DOH and EPA consider various design, operations, and maintenance constraints including matching non-compliant equipment and matching manufacturers for new products.

ANTICIPATED IMPACT IF NO WAIVER ISSUED

The product identified above is not readily available domestically and/or adds complexity to operations and maintenance. If the waiver is not issued, certain equipment will have to be replaced with BABA compliant versions that could come at a cost of significant scheduling impact and/or slight redesign of the project resulting in need of additional funding for the project as well as prolonging the project completion.

Please contact me if you have questions, concerns, or require additional information.

Sincerely,

Keller Associates, Inc.



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City of Pomeroy

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The project requires eight 6-inch butterfly valves with the following specifications:

- A. Valves shall be certified to NSF Standard 61.
- B. Butterfly valves shall be rubber seated butterfly valves that conform to AWWA C504, rated for water working pressures up to 150 psig, subject to the following requirements. Butterfly valves for general purpose service shall be rubber seated butterfly valves that conform to AWWA C504, rated for water working pressures up to 150 psig, subject to the following requirements. Valves shall be of the size and class indicated, suitable for bubble tight shut-off service as well as throttling service at rated pressure at ambient temperatures of 33 to 125 degrees F. Lug or wafer style valves shall have ANSI 125 lb flange bolt hole patterns.
- C. Body: The valve body shall be of cast iron conforming to ASTM A126 - Specifications for Gray Iron Castings for Valves, Flanges and Pipe Fittings, Class B, with either wafer, lug, or flanged design as indicated in drawings, drilled to ANSI B 16.1 - Cast Iron Pipe Flanges and Flanged Fittings, Class 125. The entire body shall be factory coated with an epoxy coating system in accordance with AWWA C550.
- D. Disc: The disc shall be a ductile iron conforming to ASTM A536, with factory applied epoxy coating in accordance with AWWA C550. The disc shall have no holes drilled into it for securing the disc to the stem with pins, screws, or any other such hardware. If the disc design is such that securing hardware is required, then the disc and securing hardware shall both be type 316 stainless steel.
- E. Seat: The valve seat shall be Ethylene-Propylene-Diene Monomer (EPDM) or Buna N and shall be bonded or vulcanized to the valve body.
- F. Stem: The valve stem shall be a Type 316 stainless steel ASTM A276, with keyed slots on the stem to make with receiving slots on the inner part of the disc requiring no disc screws or pins for connection of the stem to the disc. If connecting pins or screws are required for a particular manufacturer's design, then the disc as well as the connecting hardware shall be type 316 stainless steel.
- G. Stem Bushing: The stem bushing shall be a non-corrosive, heavy duty acetal bushing.
- H. Stem Seal: The stem shall be a double "U" cup seal or O-ring designed which is self-adjusting and provides positive sealing in both directions and is suitable for the service condition.
- I. Flange / Style: Unless otherwise specified or noted on the drawings, the style of each butterfly valve shall be lug style. The Contractor shall not use any type of raised face type PVC flange on either side of any butterfly valve. Contractor shall be responsible to ensure that the selected butterfly valve will fully open and close without any physical interference at all.
- J. Testing: Valves shall be factory leak tested in accordance with AWWA C504.

2.2 ACTUATORS

- A. Manual Actuators: Actuators shall conform to Section 40 05 57 – Actuators for Process Valves and Gates and to ANSI / AWWA C540 - Power Actuating Devices for Valves and Sluice Gates, subject to the following requirements. Unless otherwise indicated, all manually actuated butterfly valves of 6 inch diameter and larger shall be equipped with a

handwheel and 2-inch square actuating nut and position indicator. Manual lever type actuators shall allow for positive throttling and have at minimum 10 stop positions from open to close for positive locking of the valve. The manual lever type actuators as well as handwheel actuators shall have an epoxy coating per Section 09 90 00 – Painting and Coating.

2.3 PAINTING AND COATINGS

- A. All valves inside of hydraulic structures shall be provided with a high build epoxy coating system, per specifications Section 09 90 00 – Painting and Coating.

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