



Four Points Land Surveying & Engineering, Inc.

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June 30, 2025
[REDACTED]

America Iron and Steel (AIS)

Project Specific Non-Availability Waiver Request

Project Name: Contract #2 – 150,000 Gallon Elevated Tank (and piping modifications at two existing standpipes)

Loan Contract Number: [REDACTED]

Borrower: Clark County Consolidated PWSD #1, Clark County, Missouri

To Whom it May Concern:

Four Points Land Surveying & Engineering, Inc. (Four Points) provides engineering services to design, permit and bid the 150,000-gallon elevated tank and piping modifications at two existing standpipes (Project) for the Clark County Consolidated PWSD #1 (Owner). The Project is funded in part by Drinking Water State Revolving Funds and Subject to American Iron and Steel (AIS) requirements. On behalf of the Owner, Four Points 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 150,000-gallon elevated tank and piping modifications at two existing standpipes (Ramsey Jones and Lagrange Standpipes). The work includes, but not limited to, procurement of project materials, erecting a new 150,000-gallon elevated tank and piping modifications at two existing standpipes.

The total project construction cost is estimated at [REDACTED].

DESCRIPTION AND EXPLANATION OF WAIVER NEED

Four Points and Clark County CPWSD #1 are requesting the following waiver and need:

Waiver Type: a nonavailability waiver due to the manufactured products not produced in the United States.

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 AIS requirements to the Owner for piping modifications at the two existing standpipes (Ramsey Jones and Lagrange Standpipes) included in the contract for the products identified during design. Note that due to the complexity and timeline of the Project, future waivers may be identified and requested during construction. The AIS waiver is being requested for the following products:

Product	Quantity	Unit Price (each)
2 inch Stainless Steel Ball Valve	1	██████████
3 inch Stainless Steel Ball Valve	2	██████████

SUMMARY OF DUE DILIGENCE

Maquire Iron, Inc. of Sioux Falls, South Dakota (contractor) has evaluated the above product for AIS compliance through examination of manufacturer catalogs, technical data, marketing materials and personal communication with various representatives and manufacturers. EPA has also reached out to multiple manufacturers and came to the same conclusion-see attached.

SPECIFICATIONS AND DESIGN CONSIDERATIONS

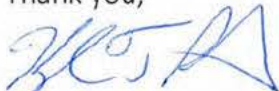
Four Points has enclosed specifications in this package for the above equipment.

ANTICIPATED IMPACT IF NO WAIVER ISSUED

The product is not readily available domestically. If the waiver is not issued, the project cannot move forward.

If you have any questions, please contact me at ██████████

Thank you,



Kyle T. Pociask, P.E.
Vice President

Enclosures: EPA Email
Specifications

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

- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]

2.05 VALVES

- [REDACTED]
 - [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
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C. Full Port Flanged Ball Valves:

1. Ball valves shall be full port, split body design meeting the requirements of ASME B16.34 for Class 150 ball valves.

2. Ball valves shall have 316 stainless steel body, stem, end cap, and ball and shall have 300 series packing gland, washer gland nut, lock tab, handle, handle washer, handle nut, and stop pin.
3. The valve shall have a two-piece stainless steel body to allow for easy maintenance of the internals.
4. The valve shall be flanged and shall incorporate the following features:
 - a. Blow-out proof stem,
 - b. Live-loaded stem seals,
 - c. Fully encapsulated body seals,
 - d. Slotted seat design,
 - e. Stainless steel floating ball design.
5. The valves shall be full port, flanged, ball valves as manufactured [REDACTED] or equal.

[REDACTED]

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