



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

King Street Center, KSC-NR-5500
201 South Jackson Street
Seattle, WA 98104-3855

NOTE:

This waiver submission may include references to proprietary items and brand name products. These references have been retained to provide context for the waiver submission. EPA does not evaluate a waiver based on a proprietary item but reviews the performance-based specifications for the project/products. As such, any references to brand or proprietary items are reviewed on an "or equal" basis by EPA.

Items and pages may have been intentionally redacted or excluded by the EPA. Contact WIFIAWaiver@epa.gov for more information if necessary.

June 4th, 2025

RE: WIFIA AIS Waiver Request

Loan Agreement #N21121WA - Project 1, King County Wastewater 2022 Improvement Projects

Dear WIFIA Program,

King County requests a product availability waiver for the mechanical component for the fittings located in and around the RSP and Grit Classifier Buildings at the West Point Treatment Plant. The Contractor has contacted their suppliers who in turn contacted several manufacturers to furnish AIS mechanical component small diameter stainless steel fittings. Suppliers and manufacturers contacted have indicated that there is no domestic source available.

Please see the following attached documents related to this request:

WIFIA AIS/BABA Waiver Request Form WPTP RSP and Grit



Thank you for your consideration of our request.

Sincerely,

DocuSigned by:

E1B31A6930084C5...

Ken Guy, Director, Finance and Business Operations Division



US Environmental Protection Agency
WIFIA Program
Letter of Interest

OMB Control No.2040-0292
 Approval expires 12/31/2027

AIS/BABA Waiver Request Form

Provide the following information in this form and attach any relevant supporting documentation.

1. Legal name of borrower or prospective borrower and WIFIA Loan ID (if available):

King County, Wastewater Treatment Division
 Loan # N21121WA Project 1

2. WIFIA Project name:

WPTP Raw Sewage Pump Replacement
 WPTP Grit Classifier Replacement

3. Waiver Request Contact List. Provide the names and email addresses of all person(s) who should be contacted in regards to this waiver request:

Ryan Snider, Ryan.Snider@kingcounty.gov
 Mizanur Rahman, Mizanur.Rahman@kingcounty.gov
 Valerie Goto, vgoto@kingcounty.gov
 Steve Baruso, Steve.Baruso@kingcouty.gov

4. Under which domestic preference requirements is the waiver being requested? **Select only one.** If applying for a waiver under BABA, there is no need to apply for a separate waiver under AIS.

☒ AIS ☐ BABA

5. Type of waiver being requested:

☐ Public Interest ☐ Cost ☒ Product Availability

6. Provide a brief explanation of the need for a waiver:

A waiver is being requested for the mechanical component for the fittings associated with the Work for hose bibbs, flushing connections, instruments, and other components located in and around the RSP and Grit Classifier Buildings at the West Point Treatment Plant. The Contractor has contacted their suppliers who in turn contacted several manufacturers to furnish AIS mechanical component small diameter stainless steel fittings. Suppliers and manufacturers contacted have indicated that there is no domestic source for small diameter SST fittings, Small-Bore Class 150# in ¼-inch to 2-inch sizes. Refer to *Attachment 1* for correspondence from suppliers.

7. Identify the total estimated material cost of the project:



8. ☒ N/A. For public interest waiver requests, please briefly explain why compliance with AIS or BABA is not in the public’s interest. Public interest waivers may be requested for the entire project or for specific products. If the waiver is being requested for specific products, please include a list of the products in the narrative with relevant project timelines.

9. ☒ N/A. For cost waiver requests, identity the total project cost with and without domestic preference requirements. Attach supporting documentation to demonstrate that the total project cost increases by more than 25 percent with the requirements, such as itemized cost estimates comparing projects costs with and without the domestic preference requirements.

10. ☐ N/A. For product availability waiver requests,
- a. Complete the following table to provide information about the product(s) for which the waiver is being requested. *For each product listed, attach a copy of the relevant technical specifications of the product to this form.*

Product Name	Brief product description (include material type and size)	
2" Threaded Tee	2" 150# 316 SST Threaded Tee	
2" Threaded 90	2" 150# 316 SST Threaded 90	
2" Threaded 45	2" 150# 316 SST Threaded 45	
2" x 1" Threaded Tee	2"x1" 150# 316 SST Threaded Tee	
2" Threaded Coupler	2" 150# 316 SST Threaded Coupler	
2" Threaded Plug	2" 150# 316 SST Threaded Plug	
2"x1" Bell Reducer	2"x1" 150# 316 SST Threaded Bell Reducer	



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1/2" x 3/8" Threaded Bushing	1/2" x 3/8" 150# 316 SST Threaded Bushing	
1" x 1/2" Threaded Tee	1"x1/2" 150# 316 SST Threaded Bushing	
1/2" Threaded 90	1/2" 150# 316 SST Threaded 90	
1/2" Threaded 45	1/2" 150# 316 SST Threaded 45	
1/2" Threaded Union	1/2" 150# 316 SST Threaded Union	
1" Threaded 90	1" 150# 316 SST Threaded 90	
1" Threaded Tee	1" 150# 316 SST Threaded Tee	
1" Threaded 45	1" 150# 316 SST Threaded 45	
1" Threaded Union	1" 150# 316 SST Threaded Union	

*Complete this column only if domestic products are available.

- b. Describe the efforts made to source compliant products. The narrative may include a list of manufacturers or suppliers contacted and responses received. Include any email correspondence with manufacturers or suppliers as an attachment.

The following Suppliers were contacted:

1. Ferguson Waterworks
2. RJB Wholesale Inc.
3. Puget Sound Pipe & Supply

Signature: The undersigned is an authorized representative of the (prospective) borrower. By signing below, the undersigned is certifying that the borrower or prospective borrower made a good faith effort to solicit bids for domestic products supported by terms included in requests for proposals, contracts, and nonproprietary communications with the prime contractor.

Signature: Ken Guy
 Date Signed: 6/4/2025

Name: Ken Guy
 Title: Finance and Business Operations Division Director
 Organization: King County
 Phone: (206)263-9254
 E-mail: Ken.Guy@kingcounty.gov

3.08 PIPING SYSTEM 11

Piping Symbol/Service:	MPG –Medium Pressure (Sludge) Gas [also called MSG] ASG – Auxiliary Sludge Gas [also called EGG] MPGV – Medium Pressure Gas Vent
Testing Requirements:	
Medium:	Air
Pressure:	15 PSIG for MPG (minimum in accordance with IFCG) and MPGV 120 PSIG for ASG (for operating at compressor MAWP of 80 psig)
Duration	120 minutes
Allowable leakage:	Zero. Reference this section for leakage testing requirements.
Gasket Requirements:	
Flanged:	Compressed gasketing consisting of organic fibers (Kevlar) and neoprene binder
Push on/Mechanical Coupling:	N/A
Exposed Pipe and Valves:	(See Drawings for pipe size and valve type)
(2-1/2" and smaller)	
Pipe:	Stainless Steel: ASTM A312, Type 316 Schedule 40S. Seamless. Ref. Section 40 05 23. Connections: butt weld, threaded (ASME B1.20.1) or flanged couplings where specified or indicated on the Drawings. See Remark 2. Threaded connections are prohibited on piping connected to hot water boilers. Flexible connections are required where boiler skid is connected to building. Fittings: ASTM A403, ends and wall thickness to match pipe.
Valves:	Ball: Nibco T-560-S6-R-66-FS-LL, or approved equal. Automatic Drain Trap: Shand & Jurs 97110-12, 5psi, 316 SST body, 2 quart capacity with neoprene gasket or approved equal. Isolate during LSG pipe testing.
(3" and larger)	
Pipe:	Stainless Steel: ASTM A312, Type 316L, Schedule 10S, Seamless. Ref. Section 40 05 23. Connections: butt weld or flanged couplings where specified or indicated on the drawings. Flexible connections are required where boiler skid is connected to building. See Remark 2. Fittings: ASTM A403, ends and wall thickness to match pipe.
Valves:	Butterfly: Ref. Section 40 05 64.

Remarks:

1. Lower test pressure at locations where noted.
2. Pipe joints shall be welded except where connections to valves or flanged appurtenances and as required by installation constraints.
3. Piping System 11 is classified as ASME B31.3 – Normal Piping category fluid service.
 - a) Do not install expansion joints during times of extreme temperature or in a fully compressed or fully expanded condition.
 - b) Align piping systems prior to installation of expansion joints, and do not use expansion joints to correct piping misalignment during installations.
 - c) Expansion joints shall be preset at the factory for rated axial compression and expansion. Install the expansion joints at the factory preset condition.

3.10 PIPING SYSTEM 1

Piping Symbol / Service:	IA – Instrument Air
Test Requirements:	
Test Medium:	Water. Ref. Section 40 05 01
Test Pressure:	125 PSI
Duration:	120 minutes
Leakage:	Zero. Ref. Section 40 05 01
Gasket Requirements:	
Flanged:	Compressed gasketing consisting of organic fibers (Kevlar) and neoprene binder.
Push on/Mechanical coupling:	N/A
Exposed Pipe and Valves:	(See drawings for pipe size and valve type)
(3/4" through 2")	
Pipe:	Stainless Steel, Type 316L, ASTM A312, SCH 40S. Refer Section 40 05 23. Connections: weld type or flanged for valves. Fittings: Stainless Steel, Type 316L, Threaded, Welded Slip-On Flange ASME B16.3, or Socket Welded Fittings SCH 40S.
Valves:	Stainless Steel, Type 316 Ball, Flanged: Contromatics Series 2801 or Jamesbury Series 7150, or approved equal. Check: Ladish 5275 or Crane Fig 377, or approved equal.
Buried and Encased Pipe and Valves:	None
Remarks: <ol style="list-style-type: none"> 1. Piping between compressors and aftercoolers shall be insulated in accordance with Section 40 42 00. 2. Lateral connections shall be made in the top half of the main line. Provide drip legs with valves at low points in the piping system. 3. Combination filter/regulator with gauge shall be Balcrank BC 820283, or approved equal, 0-175-psig reduced pressure range, 175-psi-maximum supply pressure, 120 degrees F maximum operating temperature, metal bowls, sight-glass, 0-200-psi pressure gauge, automatic filter drain. Size and location shall be as shown on Drawings for all compressed air stations. 	

3.11 PIPING SYSTEM 2

Piping Symbol / Service:	C3 – No. 3 Water, Plant Effluent
Test Requirements:	
Medium:	Water. Ref. This Section.
Pressure:	150 PSI. See Remarks for Seal Water
Duration:	120 minutes
Gasket Requirements:	
Flange:	Compressed gasketing consisting of organic fibers (Kevlar) and neoprene binder.
Push-On/Mech Cpl:	EPDM or neoprene
Exposed Pipes and Valves:	(See drawings for pipe size and valve type)
(3" and smaller)	
Pipe:	<p>Stainless Steel, Type 316L, ASTM A312, SCH 40S. Refer Section 40 05 23.</p> <p>Connections: weld type or flanged for valves.</p> <p>Fittings: Stainless Steel, Type 316L, Threaded, Welded Slip-On Flange ASME B16.3, or Socket Welded Fittings SCH 40S.</p>
Valves:	<p>Stainless Steel, Type 316</p> <p>Ball, Flanged: Contromatics Series 2801 or Jamesbury Series 7150, or approved equal.</p> <p>Check: Ladish 5275 or Crane Fig 377, or approved equal.</p>
Remarks:	<ol style="list-style-type: none"> Seal Water test pressure shall be 50 PSI more than maximum system pressure of the process fluid pumped by the pump requiring seal water, but no less than 150 PSI. Manual air vents shall be provided at the high points and manual drains shall be provided at the low points of each reach of pipeline as specified in this Section and/or shown on the Drawings. Piping installed over suspended ceilings shall be insulated for condensation control in accordance with Section 40 42 00. Piping shall be insulated and heat traced, as shown on the drawings.

3.12 PIPING SYSTEM 3

Piping Symbol/Service:	HRR – Heat Reservoir Return HRS – Heat Reservoir Supply
Test Requirements:	
Medium:	Water. Ref. Section 40 05 01
Pressure:	150 PSI
Duration:	120 minutes
Gasket Requirements:	
Flange:	Compressed gasketing consisting of organic fibers (Kevlar) and neoprene binder.
Push-on/Mech Cpl:	EPDM
Exposed Pipes and Valves:	(See drawing for pipe size and valve type)
(2 1/2" or smaller)	
Pipe:	Stainless Steel, Type 316L, ASTM A312, SCH 40S. Refer Section 40 05 23. Connections: weld type or flanged for valves. Fittings: Stainless Steel, Type 316L, Threaded, Welded Slip-On Flange ASME B16.3, or Socket Welded Fittings SCH 40S.
Valves:	Stainless Steel, Type 316 Ball, Flanged: Contromatics Series 2801 or Jamesbury Series 7150, or approved equal. Check: Ladish 5275 or Crane Fig 377, or approved equal.
Buried and Encased Pipe and Valves:	None
Remarks: <ol style="list-style-type: none"> Manual air vents shall be provided at the high points and drains provided at the low points of each reach of pipeline as specified in Section 40 05 47 Refer to drawings for locations of expansion loops or joints. Refer to specification Section 40 05 44 for expansion joints. Piping shall be insulated for heat loss control in accordance with Section 40 42 00. 	