



July 16, 2025

Isaac Cornelson, PE
Drinking Water State Revolving Fund Engineering Manager
Water Quality Division
Oklahoma Department of Environmental Quality
PO Box 707 (707 N. Robinson)
Oklahoma City, OK 73101

Subject: AIS Availability Waiver Application for potable water Backflow Preventers
City of Oklahoma City, Oklahoma City Water Utilities Trust, PWSID No.
1020902
Draper Water Treatment Plant Electrical Improvements
DWSRF Project No. P-040-1020902-12

Dear Mr. Cornelson:

The purpose of this application is to obtain an AIS availability waiver for the specified potable water Backflow Preventer. These materials will be critical to provide the necessary improvements to the HVAC system that is required to maintain the High service pump station (HSPS) and the Auxiliary High Service pump station (Aux HSPS) at the Draper WTP.

Appendices A and B attached to this letter provide justification that the contractor has provided a due diligence search for AIS compliant materials for these systems. As a result, we are requesting a waiver from the AIS requirements for these items. **This project is critical to maintaining the integrity of the water supply to Oklahoma City's system and an expedited review is requested.** Loss of the HSPS and the Aux HSPS would severely compromise the ability of the City to meet the water demands.

In addition, a similar waiver request for the 4" Backflow preventer was submitted and approved for the Hefner WTP ozone upgrades project in February, 2024. Appendix C is attached for reference.

The following information follows the Information Checklist for Waiver Requests form:

General:

1. Description: 6" potable water backflow preventer.
2. Scheduled Quantity/Item Type/Unit of Measure:

Description	Unit of Measure	Quantity
6" Backflow Preventer	Each	2

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Supporting documentation including that the contractor made a reasonable survey of the market, such as description of the process for identifying suppliers and a list of contacted suppliers.

- a. Crossland Heavy Contractors (CHC) had previously contacted [REDACTED] [REDACTED] for the Hefner project and determined that AIS compliant backflow preventers are not available. CHC has contacted [REDACTED] for the Draper project and confirmed that the status of the product has not changed.
7. Supplier information or pricing information from a reasonable number of domestic suppliers for construction materials.
 - a. See attached Appendix A.
8. Contractor and/or supplier to provide a statement confirming the non-availability of the domestic construction material which is being sought.
 - a. See attached Appendix B.
9. Has the State received other waiver requests from the materials described in the request for comparable projects?
 - a. The EPA has approved several projects in the United States with comparable projects including waivers for usage of backflow preventers including the Hefner project by ODEQ in 2024. Please see attached Appendix C.
10. Project Schedule:
 - a. The affected project has a contract price of [REDACTED] and is scheduled to be completed by [REDACTED]. Time is of the essence on the procurement of the pipe, fittings, and backflow preventer as it involves work in areas that are on the critical path to meet the scheduled completion date.

Should you have any questions regarding these documents or should you require additional information, please contact our consultant Jeremy Brehm, PE, Carollo Engineers at 303-514-7984 or JBrehm@carollo.com.

Sincerely,

CAROLLO ENGINEERS, INC.



Jeremy Brehm, PE

cc: Kendra Alexander, PE, City of Oklahoma City
Ashritha Banapuram, PE, Carollo Engineers, Inc.
Tom Crowley, PE, Carollo Engineers, Inc.
Dan Ethington, PE, Carollo Engineers, Inc.

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

SECTION 15117
SPECIALTY VALVES

PART 1 GENERAL

1.01 SUMMARY

- A. Section includes: Specialty valves.
- B. As specified in Section 15110 - Common Work Results for Valves.

1.02 REFERENCES

- A. American Society of Civil Engineers (ASCE):
 - 1. 25 - Earthquake-Actuated Automatic Gas Shutoff Devices.
- B. American Society of Mechanical Engineers (ASME):
 - 1. B16.42 - Ductile Iron Pipe Flanges and Flanged Fittings: Classes 150 and 300.
- C. American Water Works Association (AWWA):
 - 1. C511 - Standard for Reduced Pressure-Principle Backflow-Prevention Assembly.
 - 2. C800 - Underground Service Line Valves & Fittings (Also Included: Collected Standards For Service Line Materials).
- D. ASTM International (ASTM):
 - 1. A48 - Standard Specification for Gray Iron Castings.
 - 2. A126 - Standard Specification for Gray Iron Casting for Valves, Flanges, and Pipe Fittings.
 - 3. A276 - Standard Specification for Stainless Steel Bars and Shapes.
 - 4. A536 - Standard Specification for Ductile Iron Castings.
 - 5. B584 - Standard Specification for Copper Alloy Sand Castings for General Application.
- E. National Electrical Manufacturers Association (NEMA):
 - 1. 250 - Enclosures for Electrical Equipment (1000 V Maximum).

1.03 SUBMITTALS

- A. Submit as specified in Section 01330 - Submittal Procedures.
- B. Product data: As specified in Section 15110 - Common Work Results for Valves.
- C. Commissioning submittals:
 - 1. Backflow preventer certification.
 - 2. Provide Manufacturer's Certificate of Installation and Functionality Compliance as specified in Section 01756 - Commissioning.

1.04 WARRANTY

- A. Provide warranty as specified in Section 01783 - Warranties and Bonds.

PART 2 PRODUCTS

2.01 BACKFLOW PREVENTERS

- A.
- B. Design: Reduced pressure chamber type in accordance with AWWA C511.
- C. Include shutoff valves at each end of backflow preventer with properly located test cocks.
- D. Shutoff valves:
 - 1. Backflow preventers 2-inch and smaller: Provide with full-port, quarter turn, resilient seated ball valves.
 - 2. Backflow preventers larger than 2-inch: Provide with resilient seated, outside stem and yoke gate valves.

PART 3 EXECUTION

3.01 INSTALLATION

- A. Install as specified in Section 15110 - Common Work Results for Valves in accordance with manufacturer's published instructions.
- B. Backflow preventers:
 - 1. Install with a minimum clearance of 12 inches and with maximum clearance of 30 inches between the relief port and the floor or finished grade or top of containment wall.
 - 2. Install with sufficient side clearance for access for testing and maintenance.

3.02 COMMISSIONING

- A. As specified in Section 01756 - Commissioning and this Section.
- B. Manufacturer services:
 - 1. Provide certificates:
 - a. Manufacturer's Certificate of Installation and Functionality Compliance.
 - 2. Manufacturer's Representative onsite requirements:
 - a. For the following valves:
 - 1) Backflow preventer.
 - b. Installation: 1 trip, 1 day minimum.
 - c. Functional Testing: 1 trips, 1 day minimum each.
 - d. Training:
 - 1) Maintenance: 2 hours per session, 2 sessions.
 - 2) Operations: 2 hours per session, 2 sessions.
- C. Functional testing:
 - 1. Backflow preventer:
 - a. Test witnessing: Witnessed.
 - b. Conduct pressure and leak test as specified in Section 15110 - Common Work Results for Valves.
 - c. Backflow preventer certification.

END OF SECTION