



NOTE: Information in this waiver may have been redacted or removed due to issues of proprietary business information or incompatibility with Federal accessibility requirements. To request the information redacted for purposes of accessibility requirements, please email [CWSRFWaiver@epa.gov](mailto:CWSRFWaiver@epa.gov).

June 23, 2025

Ms. Abby Luangrath  
 Compliance Liaison  
 Loan & Grant Administration Section Division of Financial Assistance State  
 Water Resources Control Board  
 1001 "I" Street, 16th Floor, Sacramento, CA 95814

**SRF Project:** CWSRF No. 8372-110 (SFPUC Project No. WW-647R)  
 San Francisco Public Utilities Commission Biosolids Digester Facilities Project (BDFP)

**Subject:** AIS Availability Waiver Request for Seamless Stainless-Steel Tubing and Fittings

Dear Ms. Luangrath,

The San Francisco Public Utilities Commission respectfully requests a waiver from the American Iron and Steel (AIS) provisions required by the Clean Water State Revolving Fund loan program for the Seamless Stainless-Steel Tubing and Fittings specified for Air, High Pressure service on the Biosolids Digester Facilities Project (BDFP). These seamless stainless-steel tubing and fittings are not currently produced within the United States. Exhibit A includes manufacturer letters and emails stating that the stainless-steel seamless tubing is not able to meet AIS compliance. Also, a previous AIS waiver of the same product for the SFPUC Headworks Project is attached.

The Contractor, [REDACTED], [REDACTED] documentation includes a construction schedule (Exhibit B) for the Air, High Pressure Seamless Stainless-Steel Tubing and Fittings initially required by December 2024.

The items listed in EPA's Information Checklist for Waiver Request form are addressed below.

**General:**

1. Description:
  - a. Seamless Stainless-Steel Tubing and Fittings for Air, High Pressure, see attached Contract Specifications (Exhibit C) and attached P&ID and Mechanical Contract Drawings (Exhibit D)

**Daniel Lurie**  
Mayor

**Kate H. Stacy**  
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Commissioner

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Commissioner

**Dennis J. Herrera**  
General Manager





8. Contractor and/or supplier to provide a statement confirming the non-availability of the domestic construction material which is sought:
  - a. See Exhibit A for manufacturer letters/emails along with the previous AIS waiver of the same product for the SFPUC Headworks Project.
  
9. Has the State received other waiver requests for the materials described in the request for comparable projects?
  - a. Yes, please see the previous AIS waiver of the same product for the SFPUC Headworks Project under Exhibit A.
  
10. Project Schedule:
  - a. See Exhibit B for the project schedule indicating an initial planned date of completion by December 2024.
  
11. Engineering Discussion of Seamless Stainless-Steel Tubing
  - a. Seamless-Stainless Steel Tubing and Fittings under Specification Section 40 05 02.05 are used for the Air, High Pressure Piping System (Exhibit C).

Sincerely,



Digitally signed by Ryan Cayabyab, PE, LEED AP, ENV SP  
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# EXHIBIT C

**40 05 02.05**

**Service Air Piping System**

| <b>Piping Service</b>     | <b>Air, High Pressure</b> | <b>Air, Separation<br/>Drainage</b> |
|---------------------------|---------------------------|-------------------------------------|
| Piping Service Identifier | AHP                       | ASD                                 |

**Piping Conditions**

| <b>Pressure (psig)</b> | <b>Duration (min.)</b> | <b>Medium</b> |
|------------------------|------------------------|---------------|
| 200                    | 120                    | Air           |

**General Requirements**

1. Full-faced flanges mated with raised face flanges are not permitted.
2. Mating flanges for pipe shall be of the same Standard, Class, and Series. Mating flanges at valves and equipment shall have specified rating and matching drilling pattern.
3. Pipe threads per ASME B1.20.1.
4. Provide dielectric couplings at material transitions. Provide threaded adapters at material transitions.
5. Provide unions or flanges as shown on Drawings to allow for pipe disassembly. Spacing between unions provided for piping disassembly: not less than 60 ft.
6. Flexible grooved couplings may only be used where specifically identified on the Drawings.

**Notes**

1. Flange bolt length per ASME B16.5 plus three additional threads. Hex head bolt dimensions per ASME B18.2.1. Class 2A standard coarse series threads per ASME B1.1, standard coarse thread series. Hex nut dimensions per ASME B18.2.2 (Heavy Hex). Class 2B standard coarse series threads per ASME B1.1.
2. Apply anti-seize to stainless steel bolts before turning nut on flange bolts.
3. Provide long radius elbows.
4. Provide weld neck flanges on both sides of wafer, lug body, or flanged valves.
5. Hard, drawn, furnished in straight lengths.
6. Provide annealed tube for flared fittings. Furnished in straight lengths or coils.
7. Furnish threaded adapters at connections to valves.
8. Furnish stem extension and valve box.

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**Submerged, Washdown**

| Component                      | Line Size, in  | Rating     | Conn./Joints     | Material  | Spec Section | Notes |
|--------------------------------|----------------|------------|------------------|---|--------------|-------|
| Pipe                           | 5/8 thru 2-1/2 | Sch. 40S   | BW, SW, THD, FLG | Stainless Steel: ASTM A312-TP316L, SML, Dim. Per ASME B36.19  | 40 05 23     |       |
|                                | 1/8 thru 1/2   | —          | CPRSN            | Stainless Steel   | —            |       |
|                                | 5/8 thru 2-1/2 | Type K     | SLDR             | Copper Tube: ASTM B88   | 40 05 17     |       |
|                                | 1/8 thru 3/4   | —          | PO               | Copper  |              |       |
| Lining for Pipe and Fittings   | All            | —          | —                | None  | —            |       |
| External Coating               | All            | —          | —                | None  | —            |       |
|                                | Valves         | —          | —                | None  | —            |       |
| Fittings                       | 5/8 thru 2-1/2 | Class 3000 | SW, THD          | Forged Stainless Steel: ASTM A182-F316L, Dim. per ASME B16.11   | 40 05 23     |       |
|                                |                | Sch. 40S   | BW, FLG          | Wrought Stainless Steel: ASTM A403-WP316L Class S, Dim. per ASME B16.9  |              |       |
|                                |                | Class 150  | SW, THD          | Cast Stainless Steel: ASTM A351-CF8M, Dim. per ASME B16.3   |              |       |
|                                | 1/8 thru 1/2   | —          | CPRSN            | Compression: █████, █████, █████, or Approved Equal   |              |       |
|                                | 1/8 thru 3/4   | —          | PO               | Copper  |              |       |
| Taps                           | 5/8 thru 2-1/2 | Class 3000 | THD, SW          | Forged Stainless Steel Tee: ASTM A182-F316L, Dim. per ASME B16.11   | 40 05 23     |       |
|                                |                | Sch. 40S   | THD, SW          | Wrought Stainless Steel Tee: ASTM A403-WP316L Class S, Dim. per ASME B16.9                                      |              |       |
|                                | 5/8 thru 2-1/2 | —          | FLRD             | Cast Copper Tee, Flare: Material and dim. per ANSI B16.26   | 40 05 17     |       |
| Grooved Coupling               | All            | —          | —                | None  | —            |       |
| Flanges                        | All            | Class 150  | LWN, WN, SO      | Welded Forged Stainless Steel: ASTM A182-F316L, FF, Dim. per ASME B16.5   | 40 05 01     | 4     |
| FLG Bolts, nuts, and hardware  | All            | —          | —                | Stainless steel bolts: ASTM A193 B8M Bolts, AISI 316<br>Stainless steel nuts: ASTM A194 Grade 8M Heavy Hex Nuts | —            | 1, 2  |
| Flange gaskets                 | All            | 1/16 in    | FLG              | █████/FKM   | 40 05 01     |       |
| Mechanical Coupling Gaskets    | All            | —          | —                | None  | —            |       |
| Compression and Push-On Gasket | All            | —          | —                | None  | —            |       |

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