

# CITY OF ST. MARYS, OHIO

**CRAIG A. MOELLER**  
Supt. of Community Services  
and Engineering



**101 West Spring Street**  
**St. Marys, OH 45885-2395**

December 2, 2025

Mr. Peter Dittrich  
Ohio EPA  
Department of Environmental and Financial Assistance  
Environmental Engineering Unit  
Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

**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).**

**Re: St. Marys Ohio Wastewater Treatment Plant Upgrades  
Loan Number CS390825-004  
AIS Availability Waiver Request**

Dear Mr. Dittrich:

We respectfully request a project specific waiver from the American Iron and Steel (AIS) requirements of the Water Pollution Control Loan Fund program for a 3-inch diameter reduced pressure zone backflow preventer for the St. Marys Ohio Wastewater Treatment Plant Upgrades. The contractor has been unable to find a manufacturer that offers an AIS compliant 3" diameter reduced pressure zone backflow preventer. Attached is supporting documentation from the contractor and supplier.

Items listed in EPA's Information Checklist for Waiver Request are addressed below:

**1. General Description:**

- a. Request is for a project specific AIS waiver based on availability for one 3-inch diameter reduced pressure zone backflow preventer. See attached Specification Section 22 00 05 including requirements for backflow preventers RPZ-BFP in 2.5.D on page 22 00 05-08.

**2. Unit of Measure/Quantity/Pricing:**

- a. Request is for one 3-inch diameter reduced pressure zone backflow preventer that was included in the contractor's lump sum bid of [REDACTED] The unit cost is [REDACTED]

**3. Time of Delivery or Availability:**

- a. Three separate suppliers were contacted who reached out to three separate manufacturers and none offered an AIS compliant reduced pressure zone backflow preventer.

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4. Location of the Construction Project:

- a. Project is located at the St. Marys Wastewater Treatment Plant, 410 Defiance Road, St. Marys, OH 45885.

5. Name and Address of Proposed Supplier:

- a. [REDACTED] corporate headquarters is located at [REDACTED]  
[REDACTED]

6. Availability AIS Waiver Request Supporting Documentation

- a. Attached are letters from the prime contractor and suppliers documenting efforts to find an AIS compliant reduced pressure zone backflow preventer. They were unable to find any AIS compliant 3" diameter reduced pressure zone backflow preventer.

7. Previous AIS Waiver Requests for AIS Compliant Backflow Preventers

- a. Based US EPA's website listing approved project waivers for American Iron and Steel Requirement, there are approved waivers for backflow preventers for projects located in Ohio, Virginia, North Carolina, Nebraska, Utah, Idaho, and California.

We appreciate your timely review of this request. Please let us know if you have any questions or need additional information.

Sincerely,



Craig Moeller  
Superintendent of Community Services  
and Engineering  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

D. Backflow Preventers: RPZ-BFP:

1. Products and Manufacturers: Provide one of the following:
  - a. [REDACTED]
  - b. [REDACTED]
  - c. Or equal.
2. Type: Reduced pressure zone device with two independently acting check valves, together with an automatically operated pressure differential relief valve located between the two check valves.
3. Materials:
  - a. Body: Bronze.
  - b. Valve Discs: Buna-N rubber.
  - c. Diaphragm: Silicone rubber or Buna-N rubber.
  - d. Springs: Stainless steel.
  - e. Screws: Stainless steel.
4. Maximum Working Pressure: 150 psi.
5. End Connections: Screwed.
6. Accessories:
  - a. Air gap drain funnel with threaded outlet and vent elbow furnished by manufacturer minimum two pipe sizes larger than relief drain outlet.
  - b. Strainer with blowoff on inlet.
  - c. Ball valves on inlet and outlet.
  - d. Reduced pressure principle backflow preventer test kit for each unit furnished, provided in molded plastic carrying case with foam inserts.
7. References: ASSE 1013, AWWA C511.