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December 9, 2025

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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.

**Subject: Buy America General Applicability Waiver
FY24 EPA Community Grants Program
Water Infrastructure Backflow Upgrades Project
Western Municipal Water District of Riverside County (UEI QJFRKG8CLNX1)**

Background

Western Municipal Water District (Western Water) is the recipient of an FY24 EPA Community Grants Program (agreement pending) grant award. The scope of the grant agreement is to replace and upgrade up to 33 non-testable single-check backflow devices to testable above-grade backflow devices. Backflow prevention assemblies are installed on all commercial water service connections to prevent potential cross-connections. Existing single-check backflow assemblies will, depending on the degree of hazard, be replaced with either a double check valve detector assembly (DCDA) or a reduced pressure detector assembly (RPDA). The DCDA is a backflow prevention device that protects potable water from contamination and also uses a bypass meter to detect unauthorized water use or leaks. DCDA's are commonly used in low hazard applications like fire sprinkler systems. Some customers, because of the degree of hazard such as the presence of on-site chemicals or use of other non-potable sources, merit the more protective RPDA. An RPDA consists of two backflow devices, one on the main line and the other on a bypass line. An RPDA also has two check valves with a relief valve between the two check valves that will discharge water should either of the check valves fail or detect back pressure.

To meet the California Cross-Connection Control Policy Handbook and be compatible with Western Water's system standards (Spec W-0530, W-0531 and W-0532, attached) DCDA's and RPDA's will need:

- To be designed for no more than 175 P.S.I (cold) water working pressure
- All bare iron and steel must be coated and wrapped in plastic
- Must be approved by the University of Southern California Foundation for Cross-Connection Control and Hydraulic Research (USC standards)

- Must be a lead-free device with 4 test cocks
- Must include a factory installed bypass meter and reduced pressure principal assembly that reads in cubic feet per second
- Must include a relief valve
- Must include an adjustable pipe support
- DCDAs need to be available in 4", 6", 8", 10", and 12" diameter sizes
- RPDAs need to be available in 4" or greater diameter sizes

Review of project specific waivers available at the US EPA Build America, Buy America (BABA) Resources site did not identify any comparable waivers. However, a non-availability waiver is merited as no DCDAs or RPDAs that met both the design parameters and BABA requirements for equipment were identified. Western Water is seeking a project specific BABA Waiver for this equipment.

BABA Category:	Equipment
Waiver Type Sought:	Non-availability waiver. The type of manufactured product is not produced in the United States.
Federal Awarding Agency:	US Environmental Protection Agency
Financial Assistance Listing Name and No.:	66.202
Financial Assistance Program Name:	Congressionally Mandated Projects
Total Cost of Infrastructure Expenditures:	Unknown at this time, estimated to be approximately \$1.2 million
Items Proposed for Waiver:	Double Check Valve Detector Assemblies and Reduced Pressure Detector Assemblies. NAICS code: 237100 Water and Sewer Line and Related Structures.

Waiver Justification

University of Southern California Foundation for Cross-Connection Control and Hydraulic Research publishes a list by type, manufacturer, and model of devices which have successfully completed the laboratory and field evaluation phases of the Foundation's Approval Program. As of October 2025, only DCDAs and RPDAs from the following manufacturers were on the Foundations approved list:

DCDA Manufacturers	RPDA Manufacturers
[REDACTED]	Ames

On October 15, 2025, [REDACTED], working on behalf of Western Water, contacted the six manufacturers above and was unable to find RPDAs or DCDAs that met Western Water's requirement and BABA requirements. Details of the contact were as follows:

Date of Contact	Manufacturer Contacted	Method of Contact	Result
October 16, 2025	[REDACTED]	all brands of the manufacturer [REDACTED]. [REDACTED] has website on BABA compliant products. No DCDAs or RPDAs identified. In addition, email request [REDACTED].	Received email from [REDACTED] Compliance officer stating that there were no [REDACTED] larger than 2" diameter that also met BABA requirements.
October 16, 2025	[REDACTED]	Email request to [REDACTED]	[REDACTED]
October 16, 2025	[REDACTED]	The [REDACTED] has a website on BABA compliant products. [REDACTED]	Identified both the [REDACTED] meeting requirements, but only in the 2" size. Could

			not acquire BABA certification for devices larger than 2" diameter.
October 16, 2025			Received email October 20, 2025 stating that [REDACTED] [REDACTED] did not have BABA compliant devices in the size needed.

In addition, Western Water has submitted a Supplier Scouting Report through the National Institute of Standards and Technology Manufacturing Extension Partnership. The request was submitted October 17, 2025 and no responses were received.

DCDAs and RPDAs are essential for the completion of the project. For this reason, Western Water is requesting a non-availability waiver for both DCDAs and RPDAs. If a waiver is not approved, Western Water will not be able to undertake the Water Infrastructure Backflow Upgrades Project. Without a BABA compliant product that meets the requirements, Western Water will select equipment through a competitive procurement procedure. At this time Western Water cannot provide specific information on the manufacturer and model or price of the DCDAs and RPDAs that may ultimately be procured. Western Water wanted to first confirm the non-availability of BABA compliant devices. DCDAs and RPDAs that are not BABA compliant are widely available from Southern California vendors.

Sincerely,

DocuSigned by:

Ryan Shaw

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Ryan Shaw
Director of Water Resources

cc: Carly Pierce, Western Water
Meredith Clement, Kennedy/Jenks
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