



TALBOT COUNTY DEPARTMENT OF PUBLIC WORKS

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Mr. Stephen Liu
Region II – Project Engineer - MDE
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Baltimore, Maryland 21230

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.

Re: Talbot County Bid 23-11
Phase 1-A – “Resolution 250”
Extension of Sewer From the Region II WWTP to the Villages of Bozman and Neavitt
EPA – AIS Waiver Request
Combination Curb-stop & Check Valve Assembly

Dear Mr. Liu,

Please accept this letter as application to the EPA to allow the use of the [REDACTED] Stainless Steel Curb Stop with Check Valve Assembly in accordance with waiver condition 2 – “iron and steel products are not produced in the United States in sufficient and reasonably available quantities and of a satisfactory quality.” This application is for approval to use stainless-steel curb stop with check valve assemblies on the referenced project.

The product submitted for installation by the contractor is produced in a foreign country. However, this is a unique circumstance that meets the intent of condition 2. Below is the information required for the waiver process:

- Description of the foreign and domestic construction materials – The product in question is a combination curb stop/check valve assembly constructed of 316 stainless steel with a two-piece cast 316 stainless steel housing. The assembly includes plastic compression fittings that are molded from polypropylene.
- Unit of measure – The service valves are a standalone bid item measured individually. The price includes installation of the valve.
- Price – [REDACTED]
- Quantity – 245 assemblies will be needed to complete the project.
- Time of delivery or availability – Materials are readily available.
- Location of the construction project – This project is located in Talbot County, Maryland.
- Name and address of the proposed supplier – [REDACTED]
- Detailed justification for the use of foreign construction materials – Neither the Contractor nor the Owner have found a one-piece stainless steel combination curb stop/check valve produced in the United States. The supplier has also attested that to their knowledge there is no comparable product manufactured within the United States. Additionally, the EPA has

granted waivers for similar products multiple times in the past few years. Alternative materials (such as brass and plastic) have been considered, however they all come with disadvantages related to longevity and long-term reliability.

- Project schedule – An excerpt from the specifications with the project duration is included with this letter. This phase of the project will be undergoing a time extension that will add areas to the project that were initially missed on the plans.
- Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials – An excerpt from the drawings has been included that only calls for a curb valve and check valve. No further specifications were given in the project for these valves. The approved submittals for the contract have been included as an attachment. The standard to connect to a low-pressure force-main in Talbot County is a Stainless-Steel combination curb and check valve. [REDACTED]
- Waiver request includes a statement from the prime contractor and/or supplier confirming the non-availability of domestic construction materials from which the waiver is sought. – A letter has been included from both the manufacturer [REDACTED] and the Prime Contractor [REDACTED] stating the non-availability of domestic construction materials.
- Has the State received other waiver requests for the materials described in this waiver request, for comparable projects? – The State has received and approved other waiver requests for the same materials on comparable projects. A recent example is the Talbot County Resolution 235 Region II Sewer System Extension—an ongoing County project being constructed by the same contractor, with a scope of work nearly identical to the current project. Both projects share the same objective, which is to disconnect existing septic systems and connect properties to a regional wastewater treatment plant. Another similar waiver was granted for a project in Queen Anne County, Maryland. These precedents demonstrate consistent regional use of this product where no domestic alternative is available.

Thank you for your assistance with this and please let me know if you require any additional information.

Sincerely,



Joshua T. Elliott, P.E.
Assistant County Engineer

CURB STOP/SWING CHECK VALVES

316 STAINLESS STEEL

DESCRIPTION

316 Stainless Steel Curb Stop / Swing Check FIPT Assemblies for PE/PVC pressure piping applications.

TUBE

IPS(OD) For use on HDPE Pipe SDR 7.3 thru SDR 17 (Sizes 1-1/4" - 2" with Cepex Male Adapters)
For use on Sch 40/80 PVC Pipe with SS Gripper Ring (Sizes 1-1/4" - 2" with Cepex Male Adapters)

CTS(OD) For use on Certified PE Pipe SDR 9 & SDR 11 (Sizes 1-1/4" - 2" with Cepex Male Adapters)
For use on Cross Linked Pipe PE SDR 9 for Cold Water Only. (Sizes 1-1/4" - 2" with Cepex Male Adapters)

WORKING PRESSURE

At 73° F (23° C) 1-1/4" - 2 "rated to 200 PSI

FEATURES

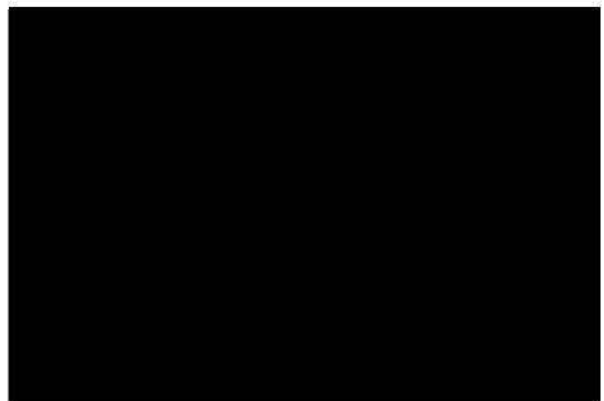
Female NPT threaded for easy adaptation to IPS/CTS polyethylene & PVC Pipe with Cepex Male Adapters

316 Stainless Steel Construction

Compact one piece design with curb stop, clean out and check valve
Fully Serviceable Check Valve with vertical service port

APPLICATIONS

Low Pressure Sewer



PARTS - CURB STOPS

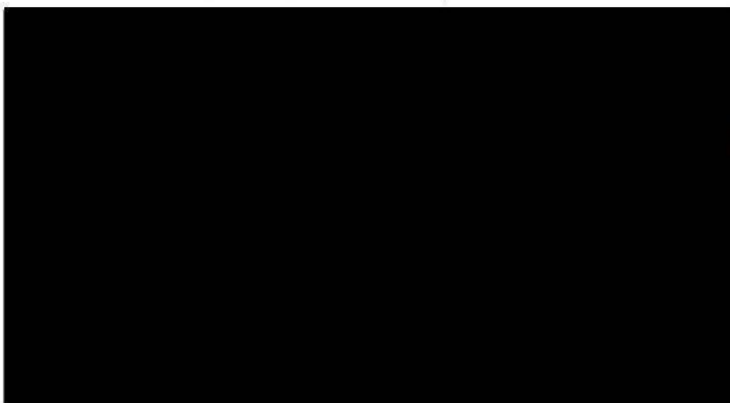


FIG.	Material	Description
1	316 SS	Curb Stop
2	316 SS	Swing Check
3	PTFE	Seats
4	RPTFE	Valve Stem Packing

