



TALBOT COUNTY DEPARTMENT OF PUBLIC WORKS

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Mr. Stephen Liu  
Region II – Project Engineer - MDE  
1800 Washington Boulevard  
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](mailto:CWSRFWaiver@epa.gov).

Re: Talbot County Bid 23-11  
Phase 1-C – “Resolution 250”  
Extension of Sewer From the Region II WWTP to the Mount Pleasant Area  
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] 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 – 23 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.

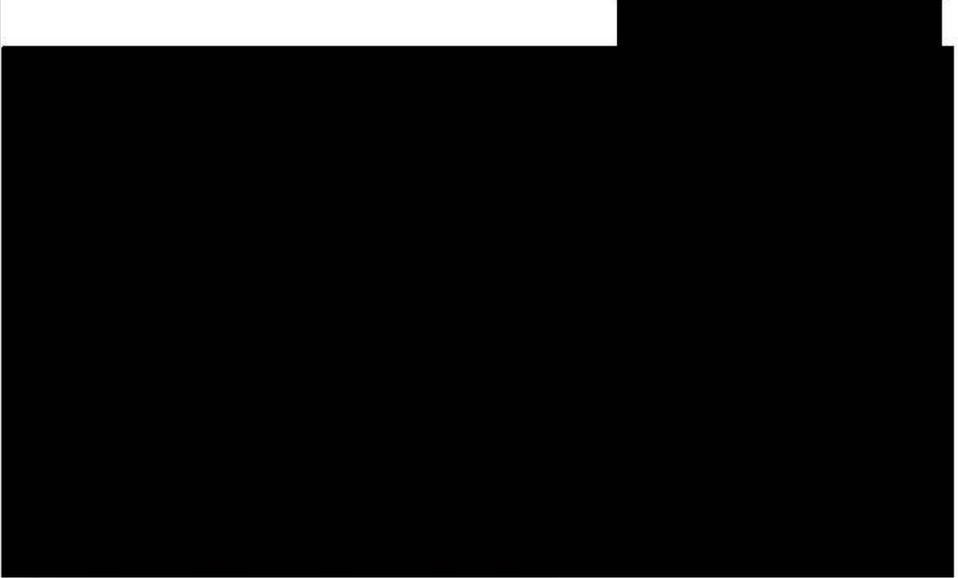
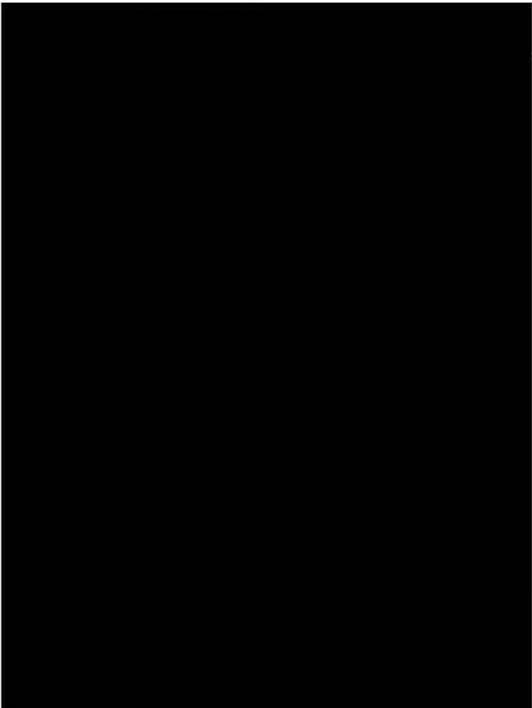
- Project schedule – An excerpt from the specifications with the project duration is included with this letter. Construction is close to an end.
- Relevant excerpts from project plans, specifications, and permits indicating the required quantity and quality of construction materials – An excerpt from 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. – [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 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.

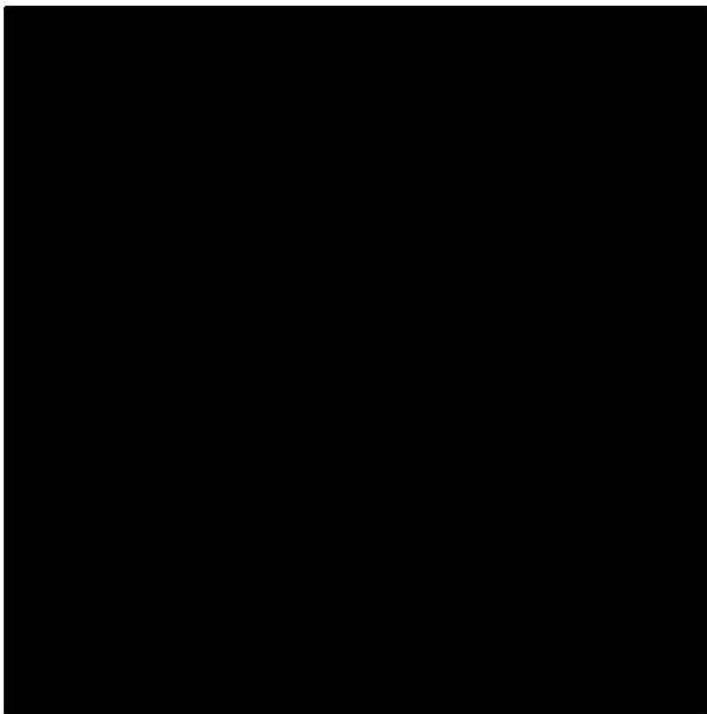
Sincerely,



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



### FEATURES AND BENEFITS

- Designed for use with HDPE and PVC pressure sewer piping
  - Type 304 stainless steel construction
  - Integrated stainless steel ball valve curb stop and check valve
  - Field serviceable — top service port allows access to check valve and hinge pin
  - Prevents backflow from the sewer main and into the grinder pump station
  - Available with or without fittings
  - 1/ 1/4" Female NPT each end
  - All valve assemblies designed and tested to 235 psi service pressure
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