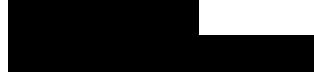




March 27<sup>th</sup>, 2026

Jonathan M. Berman  
State Revolving Fund Compliance Specialist  
Finance Division I Water Infrastructure Funding and Financing Section  
Michigan Department of Environment, Great Lakes, and Energy



Subject: Request for Waiver of American Iron and Steel Requirement for 4-inch Reduced Pressure Zone Backflow Preventers, Freud Pump Station Improvements, Detroit, Michigan State Revolving Fund Project No. 5708-01

Dear Mr. Berman,

The Great Lakes Water Authority respectfully requests a project-specific waiver pursuant to the American Iron and Steel (AIS) requirements for the purchase and installation of three (3) 4-inch diameter reduced pressure zone backflow preventers for use in the Freud Pump Station Improvements located in Detroit, Michigan. The contractor has been unable to find a domestic manufacturer that produces a 4-inch diameter reduced pressure zone backflow preventer that meets the technical specifications. Attached is supporting documentation from the contractor.

Items listed in USEPA'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 three (3) 4-inch diameter reduced pressure zone backflow preventers. See attached Specification Section 22 00 05 including requirements for backflow preventers RPZ-BFP in 2.05.E on page 22 00 05-12 and drawings showing the backflow preventer locations.

2. Unit of Measure/Quantity/Pricing:

- a. Request is for three (3) 4-inch diameter reduced pressure zone backflow preventers that were included in the contractor's lump sum bid of [REDACTED]. The unit cost for each backflow preventer is [REDACTED] and the total cost for all three is [REDACTED]

3. Time of Delivery or Availability:

- a. [REDACTED] were contacted and reached out to [REDACTED]. No (zero) manufacturers indicated that they could provide a 4-inch diameter reduced pressure zone backflow preventer that is AIS compliant.

4. Location of the Construction Project:

- a. Project is located at the Freud Storm Pump Station located at 669 Tennessee Street, Detroit, Michigan, 48215 and at the proposed Freud Sanitary Pump Station located at 693 Navahoe Street, Detroit, Michigan, 48215.

5. Name and Address of Proposed Supplier:

- a. Proposed 4-inch [REDACTED] backflow preventers will be supplied by [REDACTED] located at [REDACTED]. [REDACTED] backflow preventers are manufactured at [REDACTED].

6. Availability AIS Waiver Request Supporting Documentation

- a. Attached are letters from the prime contractor and subcontractor documenting efforts to find an AIS compliant reduced pressure zone backflow preventer. They were unable to find any AIS compliant 4-inch diameter reduced pressure zone backflow preventer.

7. Previous AIS Waiver Requests for AIS Compliant Backflow Preventers

- a. US EPA's website lists approved AIS project waivers for reduced pressure zone backflow preventers for projects located in Ohio, Virginia, Oregon, North Carolina, and California. USEPA's website lists many other approved AIS project waivers for backflow preventers that are not specifically listed as reduced pressure zone type.

Thank you in advance for your consideration. [REDACTED]  
[REDACTED]

Sincerely,

Paul H. Ransom  
Life Cycle Project Manager  
Great Lakes Water Authority

[REDACTED]  
[REDACTED]  
[REDACTED]

■ [Redacted]

