STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JANET T. MILLS
GOVERNOR

MELANIE LOYZIM
COMMISSIONER

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March 19, 2026

Andrew D. Sawyers, Director
Office of Wastewater Management
U.S. Environmental Protection Agency
1201 Constitution Ave NW
Washington, D.C 20004

Subject: CWSRF AIS Availability Waiver Request for City of Saco, Maine

Dear Mr. Sawyers:

The purpose of this letter is to request a project waiver pursuant to the "American Iron and Steel" (AIS) requirements of the Clean Water Act (CWA) Section 608 under the authority of Section 608(c)(2) for five (5) check valves ranging from 18" to 20" in diameter from [redacted] proposed for use in the City of Saco's Water Resource Recovery Facility (WRRF) Upgrades project located in the City of Saco, Maine. The project owner, the City of Saco, has requested this waiver because, through consultation with their engineering consultant and construction manager, they found that the use of domestically produced check valves may have a detrimental effect on the critical path for the project and would likely result in additional costs to the city due to the need to extend the project by up to several months. Additional information regarding this request can be found in the following sections.

Project Description

The City of Saco is currently in the process of doing a major upgrade to their WRRF in order to make the WRRF resilient to the effects of aging infrastructure, flooding from weather events, and hydraulic back-ups to facility processes, as well as to make sure the facility is ready for anticipated future license requirements and has additional treatment capacity available as the city continues to grow. Additionally, this upgrade will help to greatly alleviate the city's remaining combined sewer overflow issues as it will both increase the WRRF's peak hourly flow and add storage for when the peak hourly flow is exceeded, with the option to add additional storage, if needed.

The project consists of construction of a new headworks building with new screening and grit removal equipment, construction of an influent pump station and force main to pump flows up to three new [redacted] treatment tanks, construction of a new process and electrical building that will house the [redacted] system, electrical, new tertiary filters, and new UV disinfection system, and an upgrade from rotary presses to centrifuges for sludge dewatering. Additionally, this project will raise the grade of most of the site and portions of Front Street to 12 feet to protect the facility against flooding and preserve access to the site during flooding events. As part of this project the facility will need new check valves on the force main between the influent pump station

and the reactor tanks at the process building. Two of the check valves will be on the pump discharge lines for the high flow pumps at the influent pump station and three of the check valves will be on the force main in the process building just upstream of where it discharges into each of the treatment reactors.

Project Location

The City of Saco's WRRF is located at 68 Front Street in the City of Saco, with work also taking place along Front Street and on the site of a former city maintenance garage. The location of the site is shown in Figure 1.

Description of the Foreign Construction Material

The plans and specifications require utilization of five (5) check valves ranging in size from 18" to 20" in diameter. Two of the valves will be installed in the influent pump station and three of them will be installed in the process building.

Time of Delivery and Availability

Per the attachments to this letter the non-domestically produced check valves were immediately ready to ship and have been delivered to the site but not yet installed. Time of delivery and availability for domestically produced check valves is currently projected to be mid-April of 2026 for shipment, but as noted in the attachments to this letter this has already been pushed back nine months from the original ship date of July 21, 2025, due to manufacturer reported issues with machinery involved in producing the AIS-compliant check valves and there is no guarantee the manufacturer will be able to meet the projected ship date given the delays that have already occurred.

Name and Address of the Proposed Supplier

The proposed supplier is:

[redacted]

Detailed Justification for the Use of Foreign Construction Materials

The owner of the project, the City of Saco, requires check valves on the force main between the influent pump station and the reactor tanks in the process building to prevent backflow through the pumps as well as to prevent backflow into the force main from the reactor tanks. Although the City of Saco, their consultant, and their construction manager have been working with a domestic supplier of check valves, the supplier indicated that the earliest projected shipping date for domestically produced check valves is mid-April of 2026 vs. immediately for non-domestically produced check valves from the same supplier. The construction manager indicated that if the

shipping date for the domestically produced check valves is pushed back any further than mid-April of 2026 it is likely to have a negative impact on the critical path for the project, which would delay the project and increase costs for the owner. The construction manager indicated that they will install the domestically produced check valves if they arrive in time, but since the shipping date has already been pushed back by nine months to this point they are not confident that the supplier will be able to meet the projected shipping date of mid-April of 2026.

Documentation of the Assistance Recipient's Efforts to Find Available Domestic Suppliers (Description of Process for Identifying Suppliers and a List of Contacted Suppliers)

The City's consultant and construction manager did find a domestic supplier, [redacted], but the estimated shipping date for domestically produced check valves is mid-April of 2026, compared to non-domestically produced check valves that are readily available and are on site but not yet installed. The construction manager anticipates that the shipping date for the domestically produced check valves is likely to have a negative impact on the critical path for the project if it gets pushed back any further than the current estimate of mid-April of 2026.

Project Schedule

Work on the project began March 8, 2024. The current dates for Substantial Completion and Final Completion are February 16, 2027, and May 21, 2027, respectively.

Relevant Excerpts from Project

Key documents, figures, and correspondence are attached.

Thank you for reviewing this availability waiver request for the City of Saco. If you have any questions or need any additional information, please feel free to contact me at 207-830-1416 or jonthan.e.rice@maine.gov.

Sincerely,

Jonathan E. Rice

Jonathan E. Rice, P.E.
Environmental Engineer
Division of Water Quality Management
Maine Department of Environmental Protection

Encl.: Waiver Request Memo from City of Saco
Email from Check Valve Supplier Re: Lead Times
Sales Order Acknowledgement showing original purchase of AIS valves in April of 2025
Project Schedule
Specification Section 15110 (Project Specification for valves)
Figure 1 (Project Location)

Cc: Sarah Connors, EPA Region 1
Brandy King, P.E., Maine DEP
[redacted]
Howard Carter, City of Saco
Stacy Thompson, City of Saco

SECTION 15110

VALVES

PART 1 GENERAL

1.1 SUMMARY

A. This Section is for valves within above-ground structures and buildings. Buried valves including valves inside below-grade valve vaults are specified in Section 02518.

B. Section Includes

1. Manual Operators
2. Motorized Actuators
3. Resilient Seated Gate Valves
4. Ball Valves
5. Globe Valves
6. Butterfly Valves
7. Plug Valves
8. Check Valves
9. Pressure Reducing Valve
10. Pressure Relief Valves
11. Backpressure Valves
12. Needle Valves
13. Air Release Valves
14. Solenoid Valves
15. Telescoping Valves
16. Knife Gate Valves

C. Related Sections

1. Section 09900 - Painting
2. Section 13420 – Instrumentation

1.2 REFERENCES

A. ASTM A126 - Specifications for Gray Iron Castings for Valves, Flanges, and Pipe Fittings

B. ASTM A536 - Specifications for Ductile Iron Castings

C. ASTM B62 - Specification for Composition Bronze or Ounce Metal Castings

D. ASTM D1784 - Specification for Rigid Poly (Vinyl Chloride) (PVC) Compounds and Chlorinated Poly (Vinyl Chloride) (CPVC) Compounds

E. ASTM D4101 - Specification for Propylene Plastic Injection and Extrusion Materials

F. AWWA C504 - Standard for Rubber-Seated Butterfly Valves

G. AWWA C507 – Standard Specification for Ball Valves, 6 In. through 48 In.

H. AWWA C509 - Standard for Resilient-Seated Gate Valves for Water Supply Service

I. AWWA C550 – Standard for Protective Interior Coatings for Valves and Hydrants

J. AWWA C800 – Standard for Underground Service Line Valves and Fittings

1.3 SUBMITTALS

A. Product data including body material, valve design, pressure and temperature classification, end connection details, seating materials, trim material and arrangement, dimensions and required clearances, and installation instructions.

B. Wiring diagrams, product and performance data for electrical and pneumatic actuators, electric check valves, solenoid valves and pump directors.

C. Performance and sizing data for air release valves including manufacturer's recommended sizing requirements.

D. Valve operating and seating torques for all valves equipped with electric or pneumatic actuators.

E. As specified in Section 01330, submit certifications regarding all iron or steel products that all manufacturing processes occurred in the US.

1.4 DELIVERY, STORAGE, AND HANDLING

A. Prepare valves for shipping as follows:

1. Ensure valves are dry and internally protected against rust and corrosion.

2. Protect valve ends against damage to threads, flange faces, and weld-end preps.

3. Set valves in best position for handling. Set globe and gate valves closed to prevent rattling; set ball valves open to minimize exposure of functional surfaces; set butterfly valves closed or slightly open: and block swing check valves in either closed or open position.

B. Use the following precautions during storage:

1. Do not remove valve end protectors unless necessary for inspection; then reinstall for storage.

2. Protect valves from weather. Store valves indoors. Maintain valve temperature higher than the ambient dew point temperature. If outdoor storage is necessary, support valves off the ground or pavement in watertight enclosures.

C. Use a sling to handle valves whose size requires handling by crane or lift. Rig valves to avoid damage to exposed valve parts. Do not use handwheels and stems as lifting or rigging points.

1.5 OPERATION AND MAINTENANCE MANUALS

A. Provide O&M manuals for all valves in accordance with section 01770.

PART 2 PRODUCTS

2.1 AMERICAN IRON AND STEEL

A. All iron and steel products included in this section shall be manufactured in the US. Refer to Section 00800 for further description of the American Iron and Steel requirement.

2.2 GENERAL

A. Pressure and Temperature Ratings - As scheduled and required to suit.

B. Sizes - Same size as upstream pipe, unless otherwise indicated.

C. Extended Stems - Where insulation is indicated or specified, provide extended stems arranged to receive insulation.

D. Bypass and Drain Connections - Comply with MSS SP-45 bypass and drain connections.

E. Valves shall have the same end connections and an equivalent or higher pressure rating as the pipeline in which it is installed.

F. All materials used for public water systems or plumbing system providing water for human consumption shall be lead free as defined by the Reduction of Lead in Drinking Water Act.

2.3 MANUAL OPERATORS

A. Provide lever handles for quarter-turn valves 4 inches and smaller. Provide one lever handle for each valve supplied.

B. Valves 6 inches and larger shall be equipped with gear actuators capable of withstanding an overload input torque of 450 ft/lbs at full open or closed positions without change to the valve or valve operation. All gearing shall be enclosed with seals provided on all shafts to prevent entry of dirt and water into the actuator. All shaft bearings shall be furnished with permanently lubricated bronze bearing bushings. Actuator housing shall be cast iron (ASTM A126 Class B).

C. Manual actuator hand wheels shall be furnished on valves 6 inches and larger. Valves shall be mounted vertically with right angle drive actuators. All components of the actuators shall be designed to withstand, without damage, a pull of 200 pounds as required by AWWA C504 - Section 12.3. Actuators shall be designed to close with an effort of less than 40 pounds torque.

D. Provide manual actuator chain wheels on valves 2½ inches and larger located more than 6 feet above finished floor. Chainwheel actuators shall be furnished with a galvanized chainwheel, galvanized chain guide and galvanized chain extending to 5 feet above finished floor.

2.4 MOTORIZED ACTUATORS (4 INCH AND LARGER)

2.9 CHECK VALVES

A. Swing Check Valves, 2 inch and smaller – MSS SP-80; Class 125, cast-bronze body and cap conforming to ASTM B 62; with horizontal swing, and bronze disc; and having threaded or solder ends. Provide Class 150 valves meeting the above specifications, with threaded end connections, where system pressure requires or where Class 125 valves are not available.

B. Swing Check Valves, 2½ inch and Larger

1. Check valves shall be all iron body, bronze mounted, full opening swing type. Valve clapper shall swing completely clear of the waterway when valve is full open, permitting a "full flow" thru the valve equal to the nominal pipe diameter. Check valves shall comply with AWWA Standard C-508 latest revision.

2. Check Valves shall be rated at 175 psi water working pressure, 350 psi hydrostatic test for structural soundness. Seat tightness at rated working pressure shall be in accordance with AWWA C508.

3. Check valves shall be furnished with 125# ANSI flanged ends.

4. All cast iron shall conform to ASTM-A-126 Class B. Castings shall be clean and sound without defects that will impair their service. No plugging or welding of such defects will be allowed. Clapper shall be all bronze for sizes through 4 inch and cast iron, bronze faced for sizes 6 inch and larger. Hinge pins shall be 18-8 Stainless Steel rotating in bronze plugs. Bolts shall be electro-zinc plated steel with hex heads and hex nuts in accordance with ASTM A-307 and A-563, respectively.

5. Check valves shall be constructed to permit top entry for complete removal of internal components without removing the valve from the line. Glands shall be O-rings. Check valves shall be equipped with adjustable outside lever and spring or lever and weight to accomplish faster closing and to minimize slamming effect. Bosses shall be provided on check valves which may be tapped for draining or used for by-pass. The inside and outside of all valves together with the working parts, except bronze and machined surfaces, shall be coated in accordance with AWWA C-550. Marking shall be in accordance with AWWA C-508 and shall include size, working pressure, and cast arrow to indicate direction of flow, name of manufacturer, and year of manufacture. Check valves shall be [redacted] as manufactured by [redacted], or equal.

C. PVC and CPVC Ball Check Valves – Check valves for PVC pipe shall be molded of cell classification 12454 (formerly Type 1, Grade 1) PVC and for CPVC pipe shall be cell classification 23447 (formerly Type 4, Grade 1) CPVC in accordance with ASTM D1784, socket, threaded, or flanged ends as required. PVC or CPVC ball check valves shall have EPDM or [redacted] O-ring, seat and seal. The ball check valves shall be full flow design with the free open area equal to the equivalent pipe size. The manufacturer's name and valve size shall appear in raised letters on the valve. Valve bodies shall be true union type.

D. Polypropylene Ball Check Valves – Check valves for polypropylene pipe shall be molded of virgin non-pigmented polypropylene in accordance with ASTM D4101 with the threaded or flanged ends as required. Polypropylene ball check valves shall have [redacted] O-ring, seat and seal. The ball check valves shall be full flow design with the

3.4 THREADED CONNECTIONS

A. Note the internal length of threads in valve ends and proximity of valve internal seat or wall to determine how far pipe should be threaded into valve.

B. Align threads at point of assembly.

C. Apply appropriate tape or thread compound to the external pipe threads (except where dry seal threading is specified).

D. Assemble joint, wrench tight. Wrench on valve shall be on the valve end into which the pipe is being threaded.

3.5 FLANGED CONNECTIONS

A. Align flange surfaces parallel.

B. Assemble joints by sequencing bolt tightening to make initial contact of flanges and gaskets as flat and parallel as possible. Use suitable lubricants on bolt threads. Tighten bolts gradually and uniformly with a torque wrench.

3.6 FIELD QUALITY CONTROL

A. After piping systems have been tested and put into service, but before final adjusting and balancing, inspect valves for leaks. Adjust or replace packing to stop leaks; replace valves if leak persists.

3.7 MANUFACTURER'S FIELD SERVICE

A. The Contractor shall provide the services of a qualified manufacturer's field service representative for a minimum of 4-hours on-site for the start-up of each of the following equipment:

1. Motorized Actuators

2. Pneumatic Actuators

B. The Contractor shall provide the services of a qualified manufacturer's field service representative for a minimum of 8-hours on-site for the start-up of each of the following equipment.

1. Pressure Reducing Valves 2-1/2 inch and larger

2. Pump Control Valves

3. Pump Director

4. Surge Control Valves

C. A manufacturer's field service representative shall be provided for a separate additional period of 8-hours on-site for each manufacturer to provide operator training in the calibration, use and maintenance of all equipment provided under this Section. The Contractor shall provide the Owner with a minimum 7 days written notice of planned operator training. Training shall be conducted separate from the specified start-up.

3.8 CLEANING

A. Clean mill scale, grease, and protective coatings from exterior of valves and prepare valves to receive finish painting or insulation.

[redacted]

3.9 FINAL ACCEPTANCE AND WARRANTY

A. Final acceptance of all equipment furnished under these Specifications will be withheld until after the installation and field testing by the Engineer. The manufacturer and the Contractor shall guarantee the equipment against defects of any kind for a period of one year after final testing and acceptance.

END OF SECTION

(WORKSHEETS DELETED)

[redacted]