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From: Rhoton, Sara, ENV
To: Romero, Dennis, ENV
Cc: Friedenber, Joyce, ENV
Subject: Clayton CWSRF-149 AIS question for canal gates
Date: Tuesday, March 3, 2026 4:13:34 PM
Attachments: image001.png
Submittal 004R1 - Canal Gates_FA Review.pdf
TechSpecs-CanalGate-question.pdf
2026-02-26 Form C6 - AIS Waiver Request MWK.pdf

Dennis,

In the SRF trainings, states are encouraged to inquire if there are domestically sourced material options on behalf of borrowers prior to formally submitting a waiver request, which can take 8-12+ weeks.

<https://www.epa.gov/cwsrf/american-iron-and-steel-requirement-waiver-request-process>

Attached are: 1) technical specifications from the project; 2) technical submittal; 3) waiver request from the contractor.

Would you like to forward this inquiry to SRF_AIS@epa.gov ?

Thank you,

Sara Rhoton, P.E. (she/her/hers)

Technical Section Manager

Construction Programs Bureau

New Mexico Environment Department

505-469-2687

sara.rhoton@env.nm.us

From: Friedenber, Joyce, ENV <joyce.friedenber@env.nm.gov>

Sent: Tuesday, March 3, 2026 11:57 AM

To: Rhoton, Sara, ENV <sara.rhoton@env.nm.gov>

Subject: Clayton CWSRF-149 AIS waiver information re gates

Hi Sara,

Please find the information for EPA regarding the Clayton WWTF AIS waiver inquiry below for their canal gates.

CWSRF Loan Amount: \$1,964,094.05

Project description: The Clayton Wastewater Treatment Rehabilitation project includes rehabilitation of two of four existing wastewater lagoons.

Product description: Three canal gates will be replaced. The gates are used to transfer wastewater between lagoons and are not incidental to the project.

Specifications attached and summarized: The canal gates specified are [REDACTED] flat back mounting type. Three (3) gates are needed, all with a gate cover diameter of 19" and heights of 87", 105", and 177", respectively. The gates require galvanized steel frames, cold rolled steel stems with four (4) threads per inch with left turn direction (4TL) for operation, and appropriately sized manual handwheels for each gate size. All anchoring hardware shall be Type 316 Stainless Steel and the spigot must be machined to fit steel pipe outside diameter.

Due diligence efforts to meet AIS: The contractor for this project has searched for the canal gates through personal communication with the industry's network of suppliers and manufacturers and by querying the internet, and was not able to find any domestic canal gate manufacturers of [REDACTED]. [REDACTED] The contractor contacted [REDACTED] [REDACTED] was informed that the canal gates are non-domestic and do not comply with the AIS standards.

Project and product costs: This Clayton Wastewater Treatment Rehabilitation project has a total estimated cost of \$1,812,983 and is funded through the Clean Water State Revolving Fund. The estimated cost of the three canal gates is approximately [REDACTED]

Thanks,

Joyce

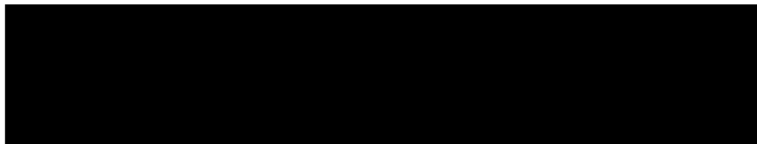
Joyce Friedenberg (she/her/hers)
Water Resources Professional III
Construction Programs Bureau
New Mexico Environment
Department 505-538-5539
joyce.friedenberg@env.nm.us

February 13, 2026



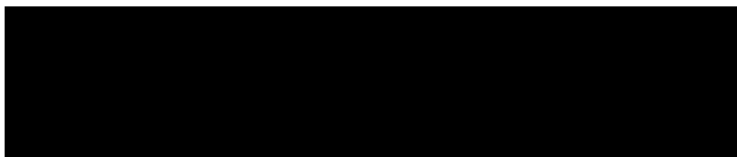
CLAYTON WWTP LAGOON REHABILITATION PROJECT
American Iron & Steel Requirements

[REDACTED] has been endeavoring to procure the canal gates for the above referenced project. The canal gates are made primarily of cast iron and are subject to the American Iron and Steel (AIS) requirements specified for this project. We have been able to find only one supplier that meets the functional specifications required. This supplier is as follows:

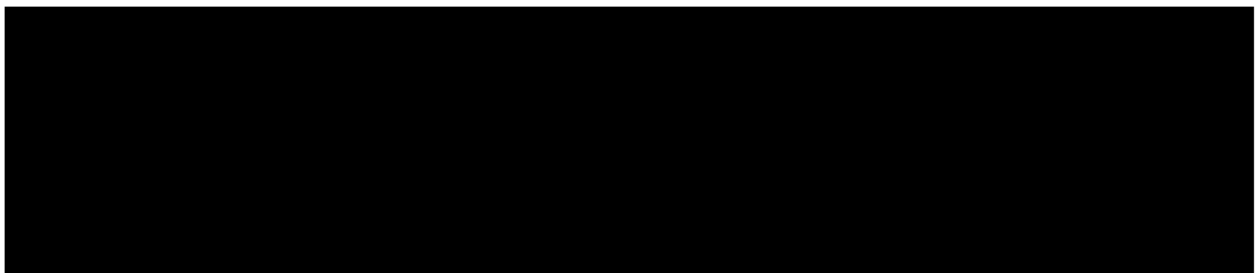
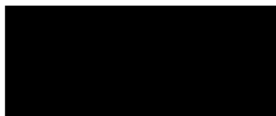


The product is called a [REDACTED] canal gate. Further information on this product is attached to this statement. The project requires three of these canal gates. This product is non-domestic and does not comply with the AIS standards.

[REDACTED] has been unable to find a domestic supplier for these canal gates that is compliant with AIS standards.



COO



PROJECT MANUAL

Contract Documents and Specifications

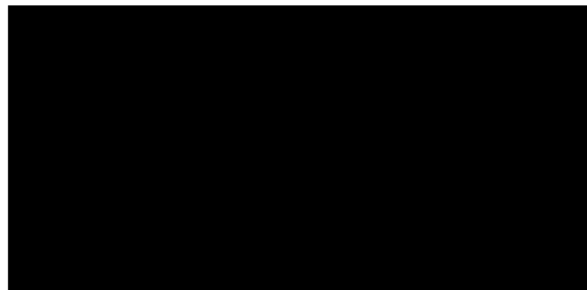
Town of Clayton Rehabilitation of WWTP Lagoons 3 & 4

December 23, 2024

Contracting Agency

Town of Clayton
1 Chestnut
Clayton, NM 88415

Project Engineer



Work under this item shall be measured and paid for at the contract unit price for ITEM 4: CONCRETE LAGOON WALL PATCHING AND REPAIR per square yard of area patched or repaired along the existing lagoon walls.

ITEM 5: CONCRETE LAGOON WALL CRACK GROUTING

The contractor shall grout any and all cracks larger than 1/4-inch in width along the existing concrete lagoon walls within the new liner footprint. This item shall include materials, tools and labor required to construct the required crack grouting as specified herein and within the project Drawings. All concrete surfaces anticipated to come into contact with the new LLDPE liner shall be grouted so that no cracks larger than 1/4-inch exist. Cracks shall be grouted to full extent of crack within liner footprint, including cracks that extend beyond clay bottom.

Non-shrink grout shall be capable of meeting manufacturer specifications with a minimum thickness of 1/4-inch or less and maximum thickness of at least 3 inches. Manufacturer specifications must be met for area preparation and product installation.

Actual quantities for concrete wall cracks requiring grouting shall be measured and verified by the Contractor. Bid quantities for this item are an estimate based on a typical section of concrete wall and are not guaranteed.

Work under this item shall be measured and paid for at the contract unit price for ITEM 5: CONCRETE LAGOON WALL CRACK GROUTING per linear foot of cracks grouted along the existing concrete lagoon walls.

ITEM 6: SAWCUT AND REMOVE CONCRETE PIPE SUPPORTS

At locations shown in the Drawings, Contractor shall neatly sawcut full depth the concrete pipe supports under the existing pipes in accordance with Detail 5 on Sheet C-5.0. Work shall include the manpower, equipment and materials necessary to remove and dispose of the concrete supports in order to provide a smooth surface in preparation for the liner. Work under this item shall be measured and paid for at the contract unit price for ITEM 6: SAWCUT AND REMOVE CONCRETE PIPE SUPPORTS for each concrete pipe support removed.

ITEM 7: REMOVE AND REPLACE CANAL GATES (CAST IRON)

Under this item, Contractor shall provide and install replacement canal gates for Lagoon 3. New canal gates shall be [REDACTED] or approved equivalent at the sizes and locations designated on the Drawings. Existing gates are flat back mounting type.

This item shall also include removal of existing gates, dewatering, repair of existing concrete structures for gate mounts as necessary, and all appurtenances, materials, equipment and labor required for a fully completed installation.

Canal gates shall consist of galvanized steel frames and cold rolled steel stems unless otherwise noted (see Additive Alternate A). Gate stems shall be four (4) threads per inch with left turn direction (4TL) for operation. Gate operators shall be appropriately sized manual handwheels for each gate size. All anchoring hardware shall be Type 316 Stainless Steel unless otherwise noted. Each gate shall be tested in

the fully open and fully closed positions to ensure no leaks exist behind the gate frames. Operation and maintenance manuals shall be provided to the Owner for each type of gate.

Measurement and payment shall be made at the contract lump sum price for REMOVE AND REPLACE CANAL GATES (CAST IRON) for each separate gate removed and replaced with a new canal gate in accordance with the bid items indicated.

ITEM 8: SLUDGE REMOVAL, HAULING, AND DISPOSAL

The contractor shall provide all necessary equipment, tools, labor and temporary access methods to remove existing sludge within Lagoons 3 and 4 without causing any damage to existing structures. Contractor shall follow the proposed construction sequence on the project Drawings and shall coordinate all operation disturbances with the Owner. Contractor shall provide a submittal for approval of sludge removal method by Engineer prior to construction. Sludge removal may be performed with the lagoons still in operation or on each individual lagoon once it has been phased out of operation. Sludge removed from the lagoons will not be permitted to be stored or stockpiled on the native ground surface and shall be contained to account for unexpected precipitation events.

The use of existing sludge drying beds shall be coordinated with Owner and shall not be overloaded with sludge. Temporary sludge drying facilities may be mobilized by the Contractor if desired but shall be considered incidental to the item cost.

Debris and spoils removed from the lagoons shall be hauled off and disposed of by the Contractor in accordance with requirements by the New Mexico Environmental Department (NMED). This item shall include all equipment, labor, tools, and any permit or disposal fees associated with the complete removal and disposal of spoils from Lagoons 3 and 4. This item includes the full removal and disposal of spoils regardless of the number of trips or required haul distance to dispose of spoils. Spoils from Lagoons 3 and 4 are anticipated to be dry by the time construction starts as they are not currently in service.

Lagoon bottoms shall also be cleared and grubbed as needed to the extent that no rocks, roots, sticks, or any other obstructions larger than or equal to 3/8-inch are present. The need for clearing and grubbing of the lagoons currently in operation will be determined by inspection when the lagoon is taken out of service and dewatered. The subgrade of the lagoons shall be reviewed and approved by the liner manufacturer and installer to ensure that its condition will not void the required warranty. The estimated areas of sludge and their depths are provided below for bidding purposes only.

Bid Item	Item Description	Unit	Estimated Quantity	Estimated Depth (inches)
8A	Lagoon 3 Sludge Removal & Disposal	SY	13,460	3
8B	Lagoon 4 Sludge Removal & Disposal	SY	12,226	1

Work under these items shall be measured and paid for at the lump sum contract prices for SLUDGE REMOVAL, HAULING, AND DISPOSAL for each separate lagoon.

ADDITIVE ALTERNATE BID ITEMS

ADD ALT A: UPGRADE NEW CANAL GATES TO STAINLESS STEEL

Furnish all 304 stainless steel frames and stems in lieu of standard cast iron or galvanized steel options. All canal gate hardware shall be 316 stainless steel. See description of bid item 7 for installation requirements. All canal gate specifications described in bid item 7 still apply if additive alternate item A is awarded, with the exception being that the gate frame and stem be composed of stainless steel.

Work under this item shall be measured and paid for at the contract lump sum price for ADD ALT A: UPGRADE NEW CANAL GATES TO STAINLESS STEEL.

ADD ALT B: SAFETY ROPES / ROPE LADDERS

The contractor shall provide and install knotted safety ropes with tire spacers or rope ladders per locations and specifications in the drawings at each lagoon.

Work under this item shall be measured and paid for at the contract lump sum price for ADD ALT B: SAFETY ROPES / ROPE LADDERS for safety rope or rope ladders installed along the lagoon edges for Lagoons 3 and 4.