

February 17, 2025

Dear EPA,

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: City of Lynchburg, CSO52 Storage Tunnel and Pump Station – Backflow Preventer AIS Availability

Description: 4" Reduced Pressure Backflow Preventers (BFP)

Unit of Measure: Each

Quantity: 1 each provided with Strainer and Air Gap Drain

Price:

Availability/Issue: Seeking waiver approval on the basis that Iron and Steel products are not produced in the U.S. in sufficient and reasonably available quantities and of a satisfactory quality.

Project Location: CSO52 Storage Tunnel and Pump Station: CSO 134 Site 16 7th Street Lynchburg, VA 24504

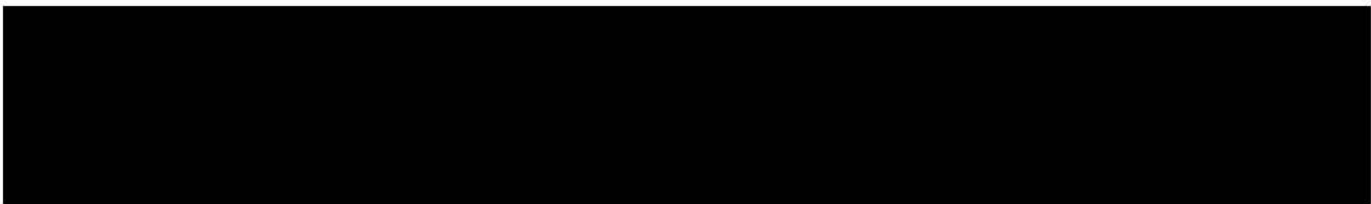
Supplier Name/Address:

Justification: [REDACTED] as the distributor and "Seller" in this situation has quoted a Backflow Preventer for [REDACTED] the "Buyer" that meets specifications provided by [REDACTED] in [REDACTED]. Current project specification manufacturers are limited due to the 4" size requirement on the project. Smaller diameter BFP's do not run into the AIS compliance issues due to brass materials of construction showing (<50%) iron or steel makeup. Please also consider previously approved waiver for 4, 6, and 8-inch Reduced Pressure Backflow Prevention Assemblies in Virginia.

Due Diligence: [REDACTED] as the seller has contacted the following alternate manufacturers as listed in the project specifications for an AIS compliant product. In all cases the available products are not AIS compliant.

- 1.
- 2.
- 3.
- 4.

Sincerely,



July 8, 2026

Project/File: Blackwater CSO Tunnel

City of Lynchburg VA

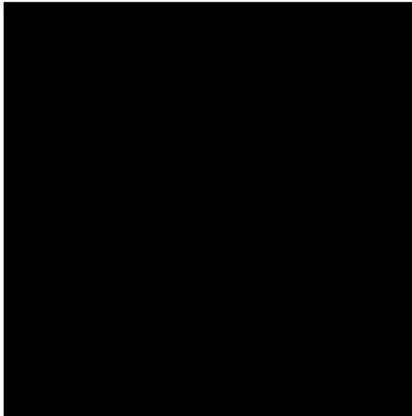
Eric Schrader
525 Taylor St.
Lynchburg VA 24504

Dear Eric Schrader,

Reference: 4in backflow preventer

In an effort to identify an AIS compliant 4in Backflow preventer which meets the specifications of the project two additional suppliers, [REDACTED] and [REDACTED], were contacted. Neither company had availability of products which met all requirements of the project specifications. Based on these results coupled with letter provided by [REDACTED] enumerating their efforts to provide an AIS compliant unit we recommend the contractors request for an AIS waiver in this case.

Regards,



Attachment: [Attachment]

c.

PROJECT: CSO 052 Storage Tunnel and Pump Station

OWNER: City of Lynchburg, Virginia

CONTRACTOR: [REDACTED]

SUBMITTAL DATE: July 8, 2026

MEMORANDUM: NON-AVAILABILITY COMPLIANCE STATEMENT

RE: American Iron and Steel (AIS) Non-Availability Waiver Request – Material Certification

To Whom It May Concern,

In accordance with the Environmental Protection Agency (EPA) and the Virginia Clean Water Revolving Loan Fund American Iron and Steel (AIS) requirements, the Prime Contractor hereby submits this formal statement confirming the non-availability of domestic iron and steel construction materials for the specialized components detailed below.

1. Material Description and Project Impact

- **Component Description:** 4" Reduced Pressure Backflow Preventer AIS Availability
- **Project Location:** CSO 052 Storage Tunnel and Pump Station site.
- **Required Quantity:** 2 Units

2. Confirmation of Non-Availability

The Prime Contractor certifies that they have confirmed with the subcontractor and associated vendor confirming the non-availability of the domestic construction materials for which the waiver is sought

Despite these positive solicitation efforts, the results indicate that the specified iron/steel products are not produced in the United States in a sufficient, reasonably available quantity, or to the satisfactory technical engineering quality required by the Contract Documents.

Sincerely,

[REDACTED]