East County
Advanced Water
Purification
Joint Powers Authority

NOTE:
This waiver submission may include references to proprietary items and brand name products. These references have been retained to provide context for the waiver submission. EPA does not evaluate a waiver based on a proprietary item but reviews the performance-based specifications for the project/products. As such, any references to brand or proprietary items are reviewed on an "or equal" basis by EPA.

Items and pages may have been intentionally redacted or excluded by the EPA. Contact WIFIAWaiver@epa.gov for more information if necessary.

July 23, 2026

VIA E-MAIL

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Subject: **Request for Waiver of American Iron and Steel (AIS) Provisions for 4" Pressure Reducing Valve for the East County Advanced Water Purification Project, WIFIA-N19141CA**
and
**Clean Water State Revolving Fund (CWSRF) Project NO. C-06-8548-110**

Dear Taetaye:

Padre Dam Municipal Water District is requesting a product-specific project waiver of American Iron and Steel (AIS) provisions to be issued for 4" pressure reducing valves for the East County Advanced Water Purification Project (Project). In accordance with the United States Environmental Protection Agency (USEPA) memorandum, Implementation of American Iron and Steel provisions of P.L. 113-76, Consolidated Appropriations Act, 2014, the information in support of this waiver request is summarized below and provided as attachments.

This request is being forwarded to you with a copy to our CWSRF contact, David Houston.

**Project Background**

The Project is in the construction execution phase of work with procurement of equipment and materials nearing completion. The Project will provide many benefits to the region and serve as a model of sustainable water supply by locally treating the East County's wastewater and implementing potable reuse by producing advanced treated water. The treated water will be pumped to Lake Jennings Reservoir for surface water augmentation supplementing up to 30 percent of East San Diego County's drinking water demands.

[redacted]

East County Advanced Water Purification Joint Powers Authority

**Equipment/Material Availability**

The Project includes the installation of two 4" pressure reducing valves, which is subject to AIS provisions. The 4" valves will be used in the CHP Generator Area S94 and will be installed at the inlet of an electric generator to reduce the pressure of the incoming upgraded biogas for the purpose of electricity generation. During the procurement of these components, the manufacturers, and suppliers for the 4" pressure reducing valves have notified the Design–Builder that they are unable to meet the AIS certifications requirements.

[redacted]

**Supporting Documentation**

[redacted]

The 4" pressure reducing valve technical specifications areprovided in Attachment 2. The 4" pressure reducing [redacted]

To maintain the Project construction schedule, delivery of these components is required on or before February 11, 2027.

[redacted]

Location of the construction project:

[redacted]

**Availability Waiver Request**

Padre Dam Municipal Water District made a good faith effort to solicit bids for domestic iron and steel products, as demonstrated by language in requests for proposals, contracts, and communications with prime contractors.

[redacted]

# Attachment 2

# Specification Section

# SECTION 400567.36 - PRESSURE-REGULATING VALVES

## PART 1 - GENERAL

### 1.1 SUMMARY

A. Section Includes:

1. Pressure-reducing valves.
2. Backpressure regulating valves
3. Water Pressure Regulators

### 1.2 REFERENCE STANDARDS

A. ASME International:

1. ASME B1.20.1 - Pipe Threads, General Purpose (Inch).
2. ASME B1.20.2M - Pipe Threads, 60 deg. General Purpose (Metric).
3. ASME B16.5 - Pipe Flanges and Flanged Fittings: NPS 1/2 through NPS 24 Metric/Inch Standard.
4. ASME B16.24 - Cast Copper Alloy Pipe Flanges and Flanged Fittings: Classes 150, 300, 600, 900, 1500, and 2500.
5. ASME B16.42 - Ductile Iron Pipe Flanges and Flanged Fittings, Classes 150 and 300.

B. ASTM International:

1. ASTM A126 - Standard Specification for Gray Iron Castings for Valves, Flanges, and Pipe Fittings.
2. ASTM A216/A216M - Standard Specification for Steel Castings, Carbon, Suitable for Fusion Welding, for High-Temperature Service.
3. ASTM A536 - Standard Specification for Ductile Iron Castings.
4. ASTM B62 - Standard Specification for Composition Bronze or Ounce Metal Castings.

C. American Water Works Association:

1. AWWA C550 - Protective Interior Coatings for Valves and Hydrants.

D. NSF International:

1. NSF 61 - Drinking Water System Components - Health Effects.
2. NSF 372 - Drinking Water System Components - Lead Content.

### 1.3 COORDINATION

A. Section 013000 - Administrative Requirements: Requirements for coordination.
B. Coordinate with installation of process piping.

1.4 SUBMITTALS

A. Section 013300 - Submittal Procedures: Requirements for submittals.
B. Product Data: Submit manufacturer catalog information.
C. Manufacturer's Certificate: Certify that products meet or exceed specified requirements.
D. Manufacturer Instructions: Submit special procedures and setting dimensions.
E. Field Quality-Control Submittals: Indicate results of Contractor-furnished tests and inspections.
F. Qualifications Statement:

1. Submit qualifications for manufacturer.

1.5 CLOSEOUT SUBMITTALS

A. Section 017000 - Execution and Closeout Requirements: Requirements for submittals.
B. Project Record Documents: Record actual locations of pressure-regulating valves.

1.6 QUALITY ASSURANCE

A. Materials in Contact with Potable Water: Certified to NSF Standards 61 and 372.

1.7 QUALIFICATIONS

A. Manufacturer: Company specializing in manufacturing products specified in this Section with minimum five years' experience.

1.8 DELIVERY, STORAGE, AND HANDLING

A. Section 016000 - Product Requirements: Requirements for transporting, handling, storing, and protecting products.
B. Inspection: Accept materials on Site in manufacturer's original packaging and inspect for damage.
C. Store materials according to manufacturer instructions.
D. Protection:

1. Protect materials from moisture and dust by storing in clean, dry location remote from construction operations areas.
2. Furnish temporary end caps and closures on piping and fittings and maintain in place until installation.
3. Provide additional protection according to manufacturer instructions.

1.9 EXISTING CONDITIONS

A. Field Measurements:

1. Verify field measurements prior to fabrication.
2. Indicate field measurements on Shop Drawings.

PART 2 - PRODUCTS

## 2.1 PRESSURE-REDUCING VALVES

A. Manufacturers:
1. Emerson Fisher 1098-ERG
2. Or Approved Equal.

B. Service Conditions:
1. Process Fluid: Conditioned Biogas
2. Service: Cogeneration Engine Biogas Inlet Pressure Regulator
3. Pressure setpoint: 1.9 psig
4. Upstream pressure Range: 2.9 - 10 psig
5. Flow range: 117 – 300 scfm

C. Description:

1. Fully automatic valves to maintain constant downstream pressure regardless of changing flow rate or varying inlet pressure.
2. Provide valve body with a through flow area equal to the nominal valve size.

D. Materials:

1. Body: Stainless Steel.
2. Seats: Stainless Steel.
   a. Main valve seat and stem bearing shall be removable.
3. Hardware: 316 Stainless Steel.
4. Stem, Nut, and Spring: Stainless steel.
5. Seat: Stainless Steel.
   a. Solid one-piece design only. Two-piece seats or seat inserts not acceptable.
6. Seal Disc: Buna-N.
7. Diaphragm: Buna-N.
   a. Diaphragm fully supported in the valve body and cover.

E. Pilot Control System:
1. Direct-acting, adjustable, spring-loaded, normally open, diaphragm valve. Pilot shall be held open by force of the compression on the spring above the diaphragm as it closes.
   a. Valves 3” and smaller: Provide an opening speed control.
   b. Pilot control system shall include a strainer and a fixed orifice closing speed. Variable orifices are not acceptable.
   c. Materials:
      1) Body and Cover: Stainless Steel
      2) Rubber: Buna-N.

## 2.2 BACKPRESSURE REGULATING VALVE

A. Manufacturers:
1. Varec 386

2. Or Approved Equal.

B. Service Conditions:
1. Process Fluid: Biogas from Anaerobic Digestion
2. Backpressure setpoint: 3 psig
3. Downstream pressure: 12-14 in w.c.
4. Flow range: 117 – 780 scfm

C. Description:

1. Provide a single-port back pressure regulator with spring-loaded diaphragm designed to maintain an adjustable upstream pressure setpoint.
2. Provide valve body with a through flow area equal to the nominal valve size.

D. Materials:

1. Body: Stainless Steel.
2. Seats: Stainless Steel.
   a. Main valve seat and stem bearing shall be removable.
3. Hardware: 316 Stainless Steel.
4. Stem, Nut, and Spring: Stainless steel.
5. Seat: Stainless Steel.
   a. Solid one-piece design only. Two-piece seats or seat inserts not acceptable.
6. Seal Disc: Buna-N.
7. Diaphragm: Buna-N.
   a. Diaphragm fully supported in the valve body and cover.

E. Pilot Control System:
1. Direct-acting, adjustable, spring-loaded, normally open, diaphragm valve. Pilot shall be held open by force of the compression on the spring above the diaphragm as it closes.
   a. Valves 3” and smaller: Provide an opening speed control.
   b. Pilot control system shall include a strainer and a fixed orifice closing speed. Variable orifices are not acceptable.
   c. Materials:
      1) Body and Cover: Stainless Steel
      2) Rubber: Buna-N.

## 2.3 WATER PRESSURE-REGULATORS

A. Description:

1. Provide water pressure regulators as indicated and specified.
   a. Provide sizes and flow rates as indicated.
2. Provide self-contained units operated by internal spring loaded diaphragms or pistons.
   a. Provide large size regulators of spring-opposed piston type where not available in diaphragm configuration.
3. Materials:
   a. Body and Spring Chamber: Type 316 Stainless Steel.
   b. Steel Body Seat: Type 316 Stainless Steel

c. Diaphragm: Buna-N Reinforced
d. Seat Disc: Buna-N
4. End Connections: NPT Female
5. Provide regulators constructed such that all repairs may be performed with valve in-line.
6. Provide regulators sized for required flows with inlet pressure and outlet pressure as indicated and specified or as required by equipment manufacturer.
   a. Pressure variation at outlet greater than 15 psig at maximum required flow is not acceptable.

## PART 3 - EXECUTION

### 3.1 EXAMINATION

A. Section 017000 - Execution and Closeout Requirements: Requirements for installation examination.
B. Inspect existing flanges for nonstandard bolthole configurations or design and verify that new pipe and flanges mate properly.

### 3.2 PREPARATION

A. Section 017000 - Execution and Closeout Requirements: Requirements for installation preparation.
B. Thoroughly clean end connections before installation.
C. Close pipe and equipment openings with caps or plugs during installation.
D. Cleaning: Clean surfaces to remove foreign substances.

### 3.3 INSTALLATION

A. According to manufacturer instructions and local code requirements.

B. Install with nameplate and test cock accessible.

### 3.4 FIELD QUALITY CONTROL

A. Section 017000 - Execution and Closeout Requirements: Requirements for submittals.

B. After installation, inspect for interferences and proper supports.

C. Testing:

1. Hydrostatic: Test each assembled valve, except control piping, hydrostatically at 1-1/2 times rated working pressure for minimum five minutes.
2. Leakage:

   a. Test each valve for leakage at rated working pressure against closed valve.
   b. Test Duration: Minimum 15 minutes.

c. Permitted Leakage: Zero.

3. Perform functional test on each valve to verify specified performance.

D. Repair damaged coatings with material equal to original coating.

## 3.5 CLEANING

A. Section 017000 - Execution and Closeout Requirements: Requirements for cleaning.

B. Keep interior of valves clean as installation progresses.

## 3.6 DEMONSTRATION

A. Section 017000 - Execution and Closeout Requirements: Requirements for demonstration and training.

B. Demonstrate equipment startup, shutdown, routine maintenance, and emergency repair procedures to Owner's personnel.

END OF SECTION 400567.36