



PUBLIC UTILITIES
DEPARTMENT
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September 24, 2026

Paul Brandl
Florida Department of Environmental Protection
Division of Water Restoration Assistance
3900 Commonwealth Blvd.
Tallahassee, FL, 32399

RE:

DW36048 – City of Fort Myers – Project Waiver Request for Domestic Duplex 2205
and Super Duplex 2507 Fittings
Water Treatment Plant RO Treatment Improvement

Dear Mr. Brandl,

The City of Fort Myers is utilizing SRF Funding for the Water Treatment Plant RO Treatment Improvement Project SRF Drinking Water Project No DW36048. The City has contracted Wharton-Smith, Inc. as the Construction Manager at Risk to complete this project.

Wharton-Smith has contacted their supplier, [REDACTED], to locate domestic Duplex 2205 and Super Duplex 2507 fittings for this project. However, domestic fittings were not available.

EPA was contacted to determine if these materials could be applied to the De Minimis. EPA determined that the materials were an integral part of the facility and therefore not eligible for De Minimis. EPA then performed market research in hopes of locating domestic fittings.

Wharton-Smith reviewed the information provided by EPA and responded with the following:

Duplex 2205 Fitting
Per the information [REDACTED] provided to the EPA, [REDACTED] ed they could provide duplex 2205 fittings, 12-inch – 1 [REDACTED] 10S as AIS-compliant [REDACTED] stated they could not source the duplex or the super duplex fittings as AIS-compliant from an [REDACTED] pproved vendor, which is a Quality Management System in accordance with the ANSI/ASME B16.9 conformance requirement per Specification Section 15064 Section 2.1.F.

Super Duplex 2507 Fittings

Per the information [REDACTED] provided to the EPA, [REDACTED] cannot source the large diameter Super Duplex 2507 Grade 32760 fittings as AIS-Compliant but [REDACTED] could provide the Super Duplex 2507 in Grade 32760 as AIS-Compliant, which does not meet what is specified for this project.

Based on our evaluation of the information provided to the EPA regarding alternative sourcing, the AIS-compliant alternate materials suggested by [REDACTED] do not meet the project requirements per Specification 15064 Section 2.1.H.

As a result of the research and evaluation processed performed by EPA and Wharton-Smith, a project specific waiver of the AIS/BABA requirements for domestic Duplex 2205 and Super Duplex 2507 fittings for the Water Treatment Plant RO Treatment Improvement Project is being requested.

If there are any questions, please contact our consultants, Angie Brewer & Associates, LC at sfm@angiebrewer.com or 941-756-5800.

Sincerely,



Jason Sciandra
Director of Public Utilities
City of Fort Myers
Public Utilities Department

This waiver request was submitted to the EPA by the state of Florida and applies only to the project in the subject line. All supporting correspondence and/or documentation from contractors, suppliers or manufacturers included as a part of this waiver request was done so by the recipient to provide an appropriate level of detail and context for the submission. There may be documents with project diagrams, schedules, and supplier correspondence in formats that do not meet the Federal accessibility requirements for publication on the Agency's website. Hence, these exhibits have been omitted from this waiver publication. They are available upon request by emailing DWSRFWaiver@epa.gov.

UNS-S32205 - 2205 DUPLEX	
<i>Item Description</i>	<i>Quantity</i>
EL 90 A815-2205 14" NPS SCH10S	3
EL 90 A815-2205 14" NPS SCH10S	8
EL 90 SR A815-22205 12" NPS SCH10S	5
EL 45 A815-2205 12" NPS SCH10S	1
TEE A815-2205 14" NPS SCH10S	3
RC A815-2205 14"x12" SCH10S	1
RC A815-2205 18"x14" SCH10S	1
CROSS A815-2205 12" NPS SCH10S	1

UNS-S32750 - 2507 DUPLEX	
<i>Item Description</i>	<i>Quantity</i>
EL 90 A815-2507 6" NPS SCH40S	12
EL 90 A815-2507 10" NPS SCH40S	3
EL 90 A815-2507 12" NPS SCH40S	10
EL 90 A815-2507 20" NPS SCH40S	3
EL 90 SR A815-2507 12" NPS SCH40S	5
EL 45 A815-2507 12" NPS SCH40S	7
TEE A815-2507 12" NPS SCH40S	1
TEE RED A815-2507 10"x6" SCH40S	2
TEE RED A815-2507 12"x6" SCH40S	1
TEE RED A815-2507 20"x10" SCH40S	1
RC A815-2507 10"x6" SCH40S	1
RC A815-2507 20"x12" SCH40S	1

Stainless Steel Pipe and Alloy Pipe, Tubing, and Accessories

F. Material Classification SSD-1

SSD-1 – Duplex Schedule 10S with Beveled Ends. RO Feed piping up to 5,000 ppm of Chloride. 2-1/2 inch and larger.	Pipe Fittings	ASTM A790, 2205 UNS S32205 or S31803 Buttwelded, ASTM A815. Fittings shall conform to ANSI/ASME B16.9, Schedule 10S with Beveled ends.
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G. Material Classification SSD-2

SSD-2 – Duplex Schedule 40S with Plain Ends. RO Feed piping up to 5,000 ppm of Chloride. 2 inch and smaller	Pipe Fittings	ASTM A790, 2205 UNS S32205 or S31803 Socket welded, ASTM A182, 2205. Fittings shall conform to ANSI/ASME B16.11, Class 3000.
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H. Material Classification SSD-3

SSD-3 – Super Duplex Schedule 40S with Beveled Ends. RO Feed piping after High Pressure Feed Pump, RO Interstage piping, RO Concentrate piping 2-1/2 inch and larger.	Pipe Fittings	ASTM A790, 2507 UNS S32750 Buttwelded, ASTM A815. Fittings shall conform to ANSI/ASME B16.9, Schedule 40S with Beveled ends.
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I. Material Classification SSD-4

SSD-4 – Super Duplex Schedule 40S with Plain Ends. RO Feed piping after High Pressure Feed Pump, RO Interstage piping, RO Concentrate piping 2 inch and smaller.	Pipe Fitting	ASTM A790, 2507 UNS S32750 Socket welded, ASTM A 815. Fittings shall conform to ANSI/ASME B16.11, Class 3000.
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J. Accessory Materials

- Accessory materials for the stainless steel pipe systems shall be as indicated. Flanges shall be raised faced for water service and shall be raised face for air or gas service except when connecting to flat face equipment or valve flanges.
Flanges

SS-2 Pipe Backing Flanges	Stainless steel plate, AISI Type 304 or 316 to match fittings. Provide stub ends or angle face rings with material and thickness to match fittings. The angle or radius between the angle face ring or stub end and the pipe shall match the angle or radius of the backing flange for proper seating. Flanges shall conform with ANSI/ASME B16.5, Class 150 diameter and drilling; with the following thicknesses: <table> <tr> <th>Nominal Pipe Size inches</th><th>Flange Thickness inches</th></tr> <tr> <td>1/2-8</td><td>1/2</td></tr> <tr> <td>10-16</td><td>5/8</td></tr> <tr> <td>18-20</td><td>3/4</td></tr> <tr> <td>24-30</td><td>1</td></tr> <tr> <td>36</td><td>1-1/4</td></tr> </table>	Nominal Pipe Size inches	Flange Thickness inches	1/2-8	1/2	10-16	5/8	18-20	3/4	24-30	1	36	1-1/4
Nominal Pipe Size inches	Flange Thickness inches												
1/2-8	1/2												
10-16	5/8												
18-20	3/4												
24-30	1												
36	1-1/4												
SS-1 Pipe Flanges	ANSI/ASME B16.5, Raised Face, Class 150, AISI Type 304, 304L, 316, or 316L, to match piping.												
SSD-1 Pipe Flanges	ANSI/ASME B16.5, Raised Face, Class 150, Duplex 2205, to match piping.												
SSD-3 Pipe Flanges	ANSI/ASME B16.5, Raised Face, Class 300, Super Duplex 2507, to match piping.												
Flange Bolts	ASTM A193 Class 2, AISI Type 304, ANSI B18.2.1, heavy hex head, length such that, after installation, the bolts will project 1/8 to 3/8 inch beyond outer face of the nut.												
Flange Nuts	ASTM A194, AISI Type 304, ANSI/ASME B18.2.2, heavy hex pattern. Washers shall be installed under the nuts.												
Flange Gaskets													
Chemical services.	Gaskets in chemical service shall be compatible with chemical.												
Exhaust pipe service.	spiral wound, AISI Type 316L stainless steel metal winding wire with non-asbestos filler, 3/16 inch nominal thickness, with compression ring 1/8 inch thick to match required flange dimensions. Flange gasket shall be suitable for temperatures from 0 °F to 1000 °F.												
All other services.	spiral wound, AISI Type 304 stainless steel, non-asbestos filler, 3/16 inch nominal thickness, with compression ring 1/8 inch thick to match required flange dimensions.												

Elbows	Except for elbows in chemical service lines 4 inches and smaller, elbows shall be long radius type for which the laying length is 1.5 times the pipe diameter.
Expansion Joints	
Exhaust Piping	Expansion joints shall be [REDACTED] or [REDACTED] equal. All materials in contact with the fluid shall be stainless steel 316L and shall be provided with stainless steel flanged ends.
Insulating Fittings	
Threaded	Dielectric steel pipe nipple, ASTM A53, Schedule 40, polypropylene lined, zinc plated; [REDACTED]. “Clearflow Fittings.”
Flanged	[REDACTED] “Dielectric Flange Unions” or [REDACTED] “Insulating Flange Unions.”

2. Branch Connections

- a. Branch connections 2-1/2 inches and smaller shall be made with welding fittings. Welded outlets shall be used. Where the exact outlet size desired is in doubt, but is known to be less than 1 inch, a 1 inch outlet shall be provided and reducing bushings used as needed.
- b. Branch connections sized 3 and larger shall be made with pipe nipples or with welding fittings with welded outlets. Pipe nipples and welding fittings shall be welded to the pipe shell and reinforced as needed to meet design and testing requirements. The pressure rating of branch and branch connections shall equal or exceed the pressure rating of the main pipe it is connected to.
- c. Small branch connections shall be so located that they will not interfere with joints, supports, or other details, and shall be provided with caps or plugs to protect the threads during shipping and handling.

2.2 WELDING OF STAINLESS STEEL AND ALLOYS

- A. Filler metal for welding austenitic stainless steel and alloys, P-number 8 base materials shall be in accordance with the following:
 1. Material Type/Grade 304 shall use Type 308 filler metal.
 2. Material Type/Grade 304L shall use Type 308L filler metal.
 3. Material Type/Grade 316, shall use Type 316 filler metal.
 4. Material Type/Grade 316L shall use Type 316L filler metal.
 5. Material Type/2205 Duplex shall use 2205 Duplex filler metal
 6. Material Type/2507 Super Duplex shall use 2507 Super Duplex filler metal.