From:	Haddox, Don <don.haddox@vermont.gov></don.haddox@vermont.gov>
Sent:	Thursday, May 30, 2024 12:32 PM
Cc:	amy.galford@vermont.gov; Jeff.fehrs@vermont.gov
Subject:	Killington (RF3-459) - AIS Waiver Request (High Pressure Butterfly Valves)

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Hello –

Please find below all relevant information for a project-specific AIS waiver for 16" high pressure class process butterfly valves for a DWSRF project in Killington, VT. Vermont ANR Water Infrastructure Division (WID) have reviewed the information submitted on behalf of the Owner by the consulting Engineer and concur with the request for a project-specific waiver for this material specifically due to lack of production in any US facility.

Project Description:

The project includes a new water source, storage, and piping system for the Town of Killington, VT, and is the initial phase of a larger water system project. One of the major purposes of this project is to provide safe drinking water to existing public water systems which have water quality concerns. The water system improvements are designed to be capable of providing both domestic and fire flow demands in the near- and long-term.

The current phase of work includes a high service pump station that will convey water from an in-building clearwell to the water storage tank. The raw water and finished water transmission mains are 16-inch diameter ductile iron, a total of 19,800 feet. Specialty high-pressure ductile iron water main is required for the first 3,000 ft of main from the pumps' discharge due to a 700-psi operating pressure.

- <u>Description of the foreign and domestic construction materials</u>: High Pressure Class Process Butterfly Valves (16")
- <u>Unit of measure:</u> each
- <u>Quantity</u>: 3
- Price: \$19,500.00 (total material cost)
- <u>Time of delivery or availability</u>: 20-22 weeks after order this is for the foreign material, no US-Sourced is available with any timeline
- Location of the construction project: Killington, VT
- Name and address of the proposed supplier: Ferguson, 134 Park St, Rutland, VT 05730
- <u>A detailed justification for the use of foreign construction materials</u>: After conferring with sources that manufacture domestic double offset butterfly valves and researching other domestic valves for AIS applications, we have determined that, to our best knowledge, there is not a 600-class, domestically-made butterfly valve.

The Consultant, on behalf, of the Owner has provided the above summary relative to efforts to source this material domestically.

The State (VT) has not received or reviewed a request for this material previously, however the project did receive an AIS waiver prior to breaking ground for similar high-pressure pipe that was not available as domestically sourced material, so believe that this is likely an extension of that availability (or lack thereof).

Please let me know if you have any additional questions or if an element of this request appears to be absent. I look forward to your response on behalf of the stakeholders in this project.

Sincerely,

Don

Don C Haddox (he/him) | Construction Engineer Vermont Agency of Natural Resources | Department of Environmental Conservation Water Investment Division, Infrastructure Engineering Section 1 National Life Dr, Davis 3 | Montpelier, VT 05620-3901 802-760-0370 don.haddox@vermont.gov

This waiver request was submitted to the EPA by the state of Vermont 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.

SECTION 15201

PROCESS VALVES

PART 1 GENERAL

1.01 SUMMARY

A. Furnishing and installing process valves for water, wastewater, air and other fluids.

1.02 REFERENCE STANDARDS

- A. ANSI B36.10M Standard Specification for Welded and Seamless Wrought Steel Pipe
- B. ASTM A126 Standard Specification for Gray Iron Castings for Valves, Flanges, and Pipe Fittings
- C. ASTM A351 Standard Specification for Castings, Austenitic, for Pressure-Containing Parts
- D. ASTM A536 Standard Specification for Ductile Iron Castings
- E. ASTM A564 Standard Specification for Hot-Rolled and Cold-Finished Age-Hardening Stainless Steel Bars and Shapes
- F. ASTM A743 Standard Specification for Castings, Iron-Chromium, Iron-Chromium-Nickel, Corrosion Resistant, for General Application
- G. ASTM B61 Standard Specification for Steam or Valve Bronze Castings
- H. AWWA C104 Cement-Mortar Lining for Ductile-Iron Pipe and Fittings for Water
- I. AWWA C110 Ductile-Iron and Gray-Iron Fittings, 3-inch through 48-inch, for Water
- J. AWWA C116 Protective Fusion-Bonded Epoxy Coatings for the Interior and Exterior Surfaces of Ductile-Iron and Gray-Iron Fittings
- K. AWWA C504 Rubber-Seated Butterfly Valves
- L. AWWA C512 Air-Release, Air/Vacuum, and Combination Air Valves for Waterworks Service
- M. AWWA C517 Resilient-Seated Cast Iron Eccentric Plug Valves
- N. AWWA C550 Protective Epoxy Interior Coatings for Valves and Hydrants

- O. NSF 61 Drinking Water System Components Health Effects
- P. NSF 372 Drinking Water System Components Lead Content
- Q. Act 193 Vermont's Lead in Consumer Products Law

1.03 SUBMITTALS

A. Submit Shop Drawings and product data in accordance with Section 01334.

1.04 QUALITY ASSURANCE

A. Provide thoroughly trained and experienced personnel who are completely familiar with and equipped for the work required in this Section.

PART 2 PRODUCTS

2.02 REGULATORY REQUIREMENTS

- A. All materials that come into contact with potable water shall comply with Vermont's Lead in Consumer Products Law, Act 193, and NSF 372, which require that the wetted surface of materials shall not contain more than a weighted average of 0.25% lead.
- B. All materials that come into contact with potable water shall be NSF 61 certified.



- C. Butterfly Valves High Pressure