A-201-805
Remand
Scope Determination
EG III-8/JD

THIRD REDETERMINATION ON REMAND

CIRCULAR WELDED NON-ALLOY STEEL PIPE FROM MEXICO:

SCOPE DETERMINATION - GALVAK

In the Matter of: Final Scope Ruling - Antidumping Order on Circular Welded Non-Alloy Steel Pipe From Mexico,

Secretariat File No. USA-Mex-98-1904-05 (NAFTA Panel Decision, December 18, 2002)

Summary

This remand determination involves a challenge to the Department's Final Scope Ruling - Antidumping Duty Order on Certain Circular Welded Non-Alloy Steel Pipe from Mexico; Galvak, S.A. de C.V., November 19, 1998. In accordance with the Panel's remand instructions in the above-referenced case, we have re-examined the Second Redetermination on Remand, Circular Welded Non-Alloy Steel Pipe from Mexico: Scope Determination - Galvak, June 16, 2003, ("Second Redetermination") by the Department of Commerce ("the Department") with regard to explaining further the Department's analysis of the evidence on the administrative record. The Panel stated that the Department "did not explain its application of (the) definition to the record evidence concerning Galvak's products with sufficient clarity to determine whether the Department's conclusions are supported by substantial evidence in the administrative record as a whole." After addressing the concerns raised by the NAFTA Panel, and after reviewing comments

received from petitioners and Galvak regarding a draft of this redetermination, we have further clarified the definition of mechanical tubing as a "specialized, made-to-order product" and have examined the record to determine which of Galvak's products are mechanical tubing.

Background

On December 18, 2003, the Panel affirmed the Department's Second Redetermination in part, and remanded in part with instructions to further explain its analysis of the evidence on the Administrative Record.

In its third remand to the Department, the NAFTA Panel accepted the definition of mechanical tubing that Commerce put forth in its Second Redetermination. Although the Panel found that the Department's definition is reasonable and consistent with the order, the Panel found that Commerce does not explain its application of this definition to the record evidence concerning Galvak's products with sufficient clarity. Accordingly, the Panel found that the Department's analysis was "flawed" in the following respects:

1. The Second Redetermination "does not explain the extent to which the information contained in Attachment 2 of Galvak's August 11, 1998 submission was considered."
2. The Department's analysis does not explain why a diameter of 1.900 inches is equivalent to 1½ inches for purposes of its analysis.
3. The Department's analysis does not explain why Galvak's mechanical tubing used in greenhouse kits, which requires a protective, organic coating is not considered to be a "specialized made to order" product.
4. The Department's analysis does not sufficiently describe Commerce's analysis of Galvak's evidence in the context of the mechanical pipe definition, articulated in the Second

Redetermination, to enable the Panel to perform its review.

Therefore, the Panel remanded the Scope Determination to the Department and has instructed the Department to apply its definition of mechanical tubing to all of the evidence on the record to determine what products are properly considered mechanical tubing.

On January 26, 2004, the Department issued the draft redetermination to both petitioners and Galvak, soliciting comments. These parties submitted comments on February 2, 2004. A summary of the comments, as well as the Department's response, is below.

Analysis

The Definition of Subject Merchandise as Distinguished From Mechanical Tubing

Before addressing the particular deficiencies enumerated by the Panel, it is first important to discuss standard pipe, as distinguished from mechanical tubing. As the Department stated in the first redetermination, "The merchandise in question is steel pipe, formed into a circular shape and welded. This physical description alone covers many types of steel pipe, not all of which are intended to be covered by this Order." Redetermination at 5. Standard pipe subject to this order is, by definition, a steel pipe which is circular and welded in a specific size range. It is used for low pressure conveyance of certain fluids and gases in various piping systems. It also can be used for light load-bearing applications such as fence tubing, and as structural tubing for framing and certain load-bearing applications. Standard pipes generally are made to recognized specifications, such as ASTM A-53 or to certain fence tubing specifications, which establish certain physical, mechanical and chemical characteristics that the product should possess. Producing material to these specifications is recognized as a determinant for the noted intended applications of the product. However, these specifications do not set guidelines so specific so as to limit the flexibility

of manufacturers to produce a wide range of products that comply with the specification. For example, the A-53 specification sets a maximum level of 0.25 percent carbon for Grade A material, or a maximum manganese level of 0.95 percent. Any material with carbon or manganese levels less than the noted maximums is in compliance with the specification. Also, the specification states that the minimum wall thickness at any point shall not be more than 12.5 percent under the nominal wall thickness specified. In addition, the specification is silent as to certain characteristics such as painting and certain additional chemical elements. What the standard pipe specification is not silent on is that, whether for conveyance, fence tubing or structural applications, standard pipe is produced in specific diameters and wall thicknesses, with a range of dimensional tolerances on these characteristics.

While mechanical tubing can comply with basic description of the pipe subject to this order, its removal from the order is based on its recognition by purchasers and producers as a specialized, made-to-order product. This denotes a product possessing unique chemical, physical, and mechanical characteristics, most notably the physical characteristics. It is a custom made, unique size product that is made to order, thereby differentiating it from the "standard sizes" of pipe and fence tubing covered by the order. Non-standard pipe sizes generally would be considered to be outside the scope of the order. The ASTM A-787 specification indicates that there are no specific diameters or wall thicknesses listed; rather, products are produced and marketed in a variety of sizes. Like the other products subject to this order, mechanical tubing is a welded product. However, because it is a specialized, made-to-order product, by definition it is not generally meant for the applications that utilize a product made to standard specifications. Standard pipe, for example, comes in specific diameters such as 1 inch, 1½ inches, 2 inches, 2½ inches, etc. A steel pipe with a diameter of 1 5/8 inches is not recognized as standard pipe because

it does not come in a noted standard diameter, which limits its application in standard pipe uses. Rather, such pipe or tubing likely could be a specialized, made-to-order product which would be classified under a different ASTM specification and not subject to this order. Similarly, a pipe that has a diameter of 2 inches but which does not have a nominal wall thickness (in inches) of 0.072, 0.085, 0.109, 0.111, 0.154, 0.218, 0.344, or 0.436, allowing for wall thickness tolerances inherent in the standard pipe specification, could be recognized as not being standard pipe nor fence tubing as the different wall thicknesses indicate a specialized made-to-order product and these sizes are outside the dimensional tolerances of standard pipe. As the Department stated in the Second Redetermination:

> The Department understands that the ASTM A-53 specifications alone do not constitute record evidence. However, the Department finds that citing to the dimensional standards, coupled with the analysis presented above, demonstrates that the tubing produced to the standards cited is not mechanical tubing, but merchandise subject to this Order. The Department reiterates that mechanical tubing is outside of the scope of the Order. However, the Department has also concluded that tubing produced to the diameter, wall thickness, and length specifications of standard pipe and fence tubing are not mechanical tubing, which is a specialized, made-to-order product.
>
> Second Redetermination at 7. Also, as the Department stated in the Redetermination:
>
> Mechanical tubing is custom designed to meet a customer's specific needs, and manufactured to non-standard specifications. While it is possible that such mechanical tubing *could* be used in certain limited standard pipe applications, its custom design and non-standard specifications are what set it apart from standard pipe. These differences are driven by the intended uses of the product, which in turn drive the industry classification of that product.
>
> Redetermination at 16.

The Panel has requested further clarification of the Department's analysis. Therefore, the Department will address each of the concerns enumerated by the panel in the paragraphs below.

(1) Attachment 2 of Galvak's August 11, 1998 Submission

The Panel said that the Department's Second Redetermination was insufficient, in part because it did not "explain the extent to which the information contained in Attachment 2 to Galvak's August 11, 1998, submission was considered" (Memorandum Opinion and Order, December 18, 2003, Page 8). The Panel said that it viewed this information as vital because Attachment 2 appeared to include a matrix showing the variety of outside diameter sizes in which Galvak makes mechanical tubing and each of the wall thickness in which each diameter of tubing may be manufactured. It appeared to the Panel that this information appears to be exactly the 'explicit information on characteristics of specific wall thickness and diameter size' that the Department states is lacking on the record.

Although not specifically referenced, the Department examined Attachment 2 of the August 11, 1998, submission, both in its original determination and in the Second Redetermination. Attachment 2 is a list of products that Galvak could produce. Some of the products listed, such as oval, square, or rectangular tubing, are not within the scope of this Order as they are not circular. Some of the products listed were circular, however. Concerning the round or circular pipes listed in Attachment 2, they are products that Galvak could produce, but not products which Galvak stated it explicitly intended to produce and export to the United States. As the Department had originally requested information on those *specific* products which Galvak intended to produce and export into the United States, this chart was not useful in the original determination as it did not specify exactly which of these products, if any, Galvak intended to export to the United States. In addition, because this determination was only intended to address ASTM A-787 products, any product other than a ASTM A-787 product was beyond the purview of the determination.

In light of the Panel's redetermination, however, we have examined the physical specifications of all of the products listed in Attachment 2. As previously stated, those products

which are not circular or round (i.e. oval, square, or rectangular tubing) are outside the scope of the order. Of the remaining products, we found that, based on the evidence on the record, eight products listed in Attachment 2 comply with the physical and chemical specifications of standard pipe and are thus within the scope of the Order. Additionally, four products listed in Attachment 1 are also within the scope of the Order. The remaining products appear to be outside of the scope based on their dimensional characteristics. See Appendix 1 and Appendix 2 of this redetermination for further information.

(2) A Product With a Size of 1 ½ Inches Has an Outside Diameter of 1.900 Inches

The Panel states that "Commerce's analysis also fails to explain why a diameter of 1.900 inches is equivalent to 1½ inches for purposes of its analysis." The Panel said that Attachment 2 seemed to indicate that Galvak produces tubing in both 1½ inch and 1.900 inch diameters in a total of 9 different wall thicknesses, and therefore, the Panel questioned why the Department in its Second Redetermination only considered one of these products to be within the scope of the order while the other was not within the scope (Memorandum Opinion and Order, December 18, 2003, Page 8). However, as the Department explains below, "1½ inches" indicates the nominal pipe size of the pipe ordered, and "1.900" inches indicates the outside diameter of that pipe size. The merchandise with a nominal outside diameter of 1.900 inches, and with wall thicknesses which meet the specifications of standard pipe, is within the scope of the order.

We refer the Panel to Attachment 1 of the Department's Second Redetermination of June 16, 2003. The first page of Attachment 1 contains a table of ASTM A-53 dimensions. Column 1 on the left contains the heading 'NPS Designator,' column 2 the heading 'DN Designator' and column 3 'Outside Diameter, in. [mm]'. The last column gives the outside diameter of pipe in both

inches and millimeters.

In the first column, the Department directs the Panel to the number '1½' with a DN Designator of 40. This figure of 1½ indicates the nominal pipe size. Consumers requesting standard pipe would order merchandise based on the nominal pipe size. In the third column, note that the product with a nominal pipe size of 1½ inches has an outside diameter, in inches, of 1.900 (or 48.3 millimeters).

An examination of Attachment 2 of Galvak's August 11, 1998, submission indicates that column 1 of their product chart is labeled 'O.D. Sizes (inches)'. This indicates that the sizes listed in column 1 refer to outside diameters. Thus, the size in Galvak's "O.D. Sizes Column" of 1.900' would be equivalent to the same outside diameter in Attachment 1 of the Second Redetermination, or equivalent to a nominal pipe size of 1½ inches.

The Department notes that Galvak also lists a product with an outside diameter of 1½ inches. The nominal pipe size of this product would be less than 1½ inches, which is not a specified nominal size in the standard pipe specification, and therefore would be outside the scope of the Order.

(3) The Application of an Organic Coating on Tubing Used for Greenhouse Kits Does Not, By Itself, Render Galvak's Pipe a "Specialized Made-to-Order" Product.

As the Department stated above, standard pipe meets a minimum set of specifications and comes in specific sizes based on diameter and wall thickness. The specification lists specific metallic coatings in which a producer must meet certain minium coating weights (e.g., galvanized). However, the coating in the specification is not an exhaustive list of potential materials. In fact, the specification is silent on certain non-metallic coatings. Therefore, putting coatings, such as organic

coatings, on the pipe does not remove it from meeting the standard pipe specification. There are various non-metallic coatings not specifically listed in the specification that are commonly used on standard pipe. Hence, putting an organic coating on this product does not necessarily make it a "specialized made-to-order product." This is why the focus for differentiating standard pipe from mechanical tubing has been based primarily on dimensional characteristics.

(4) The Department's Analysis of Galvak's Evidence In the Context of the Department's Mechanical Pipe Definition Articulated in its Second Redetermination.

While the evidence on the record is incomplete in regards to the exact products that Galvak intends to export, the Department, in the course of this Remand, has reexamined all the 'possible' products that Galvak could produce and export to the United States as contained in Attachments 1 and 2 of the August 11, 2003, submission. As explained above, taking into account the tolerance variance allowed under the standard pipe specification, approximately 8 products in Attachment 2 appear to overlap with the characteristics and dimensions of "standard pipe," and therefore, these are the only products within the scope of the order. In comparing Attachment 1 of the August 11, 1998, submission to Attachment 2 of the Second Redetermination and petitioners' August 28, 1998 submission, and again taking into account the 12.5 percent thickness tolerance variance, seven products appear to overlap to either standard pipe or fence tubing specifications, as presented to the Panel, and are not 'specialized made-to-order' products. See Appendix 1 and Appendix 2.

Analysis of Interested Party Comments

Petitioners

Petitioners state that while they endorse much of the reasoning in the draft redetermination,

they believe that the Department's methodology in implementing its decision is flawed. In their letter of February 2, 2004 (Petitioners' comments), petitioners argue that the Department's use of dimensional characteristics as the primary system of differentiating between in-scope and out of scope merchandise is incorrect. Petitioners stated that "the physical characteristics of the merchandise subject to the scope request cannot act to exclude the merchandise from coverage under the Order . . . ." Petitioners' comments at 5. Additionally, while petitioners recognize that the Department is attempting to follow the direction of the NAFTA panel, petitioners believe that the Department's examination of Galvak's product brochure in Attachment 2 in the August 11, 1998, submission goes beyond the parameters of the original scope inquiry which is the subject of this redetermination and encompasses merchandise outside of this proceeding. Such action, according to petitioners, is beyond the purview of the Department and the Panel. Petitioners state that the Department should limit its consideration of Galvak's merchandise to the products listed in Attachment 1 of the August 11, 1998, submission. Petitioners also state that the Department has erroneously defined the scope of the Order by reference only to the ASTM A-53 standard, to the detriment of fence tubing standards.

Rather than concentrate on physical dimensions, standards, or Galvak's product brochure, petitioners believe that the Department should concentrate on the end use of the merchandise, and that Galvak bears the burden of distinguishing merchandise covered by the Order.

Galvak

Galvak argues that the Department's reliance on dimensional or physical characteristics of the merchandise in question to determine whether said merchandise is in-scope is incorrect. Instead, in its letter of February 2, 2004 (Galvak's comments), Galvak states that the Department

should make its determination of what constitutes in-scope merchandise based on industry classification. Galvak argues that all previous decisions for excluding merchandise from the scope of this order were based on industry classifications. "As we have explained *ad nauseum* throughout this proceeding, the Department's past decisions have unambiguously held that line pipe, mechanical tubing, and the other products that are excluded from the scope in the same sentence of the order are all defined by industry classifications." Galvak's comments at 3.

Galvak states that merchandise produced to ASTM A-787 standards cannot meet the specifications for ASTM A-53 pipe. Galvak argues that merchandise produced to ASTM A-787 standards are not certified to meet ASTM A-53 standards for yield strength, tensile content, bendability, and other standards. Galvak comments at 5. Since merchandise under ASTM A-787 cannot meet the standard pipe specifications, according to Galvak, it cannot be considered as in-scope merchandise. Galvak further argues that a product certified to meet the ASTM A-787 specification is, perforce, a 'specialized made-to-order product.' In other words, the specification itself denotes a product which is specialized and made-to-order and, by inference, not a standard or commodity product.

Finally, Galvak states that the Department, by emphasizing sizes and dimensions as well as the ASTM A-787 certification, implicitly recognizes that such certifications are probitive of the nature of the merchandise in question. Galvak argues that if ASTM A-787 certification were not probative, then the Department would have to rule that any merchandise not produced to standard sizes is a "specialized, made-to-order product" is not subject to the Order. This would result in almost all pipe certified to ASTM A-500 specifications being excluded from the Order.

Department's Response

Because both interested parties in this proceeding devoted most of their arguments to the criteria which the Department should use to determine what constitutes in-scope merchandise, the Department will address this point first. We will subsequently address the other comments by the parties.

In their comments to the Department, petitioners and Galvak both argue that the Department should determine what is and what is not in-scope merchandise based upon narrowly defined criteria. For petitioners, the criterium is end use. For Galvak, the criterium is product specification/industry classification. It is the Department's position that physical characteristics, industry classification, and intended/expected use are interrelated and, in this instant scope determination, cannot by themselves serve as the determining factor of what is or is not in-scope merchandise. Instead, the relationship between the three factors must be examined in order to determine whether Galvak's merchandise is within the scope of the Order.

As the petitioners noted, the Department has determined that intended uses, physical characteristics, and classifications are interrelated. See Petitioners' comments at 3. In the Redetermination, the Department states that "[m]echanical tubing is custom designed to meet a customer's specific needs, and manufactured to non-standard specifications. While it is possible that such mechanical tubing *could* be used in certain limited standard pipe applications, its custom design and non-standard specifications are what set it apart from standard pipe. These differences are driven by the intended uses of the product, which in turn drive the industry classification of the product." Redetermination at 16. As we stated above, the intended or expected uses of a product are usually critical to the classification of the product, as they often drive the physical dimensions and characteristics of the product as well. The correlation between physical dimensions, intended

use, and classification are not *always* exact, however. Thus, neither end use nor classification alone are necessarily sufficient to determine whether a product is within the scope of the Order.

Obviously there are instances where classification alone is sufficient, as the classification is in direct correlation with the intended/expected uses. For example, it is obvious that pipe classified solely as ASTM A-53 is indeed covered by the scope of the Order. Conversely, there are times when industry classification does not play the primary role in determining whether merchandise is covered by the Order. See, e.g., Redetermination at 9. Therefore, as the Panel has in essence instructed, the Department must examine all of the evidence on the record to determine whether there is a direct correlation between physical characteristics, intended use, and classification.

In the case of standard pipe and fence tubing, these pipes and tubes have specific intended uses, and specific dimensional characteristics, which result in specific classifications. These products are not made-to-order, but are instead commodity products containing certain fixed physical characteristics. The Panel has affirmed the Department's determination that mechanical tubing is a specialized, made-to-order product. What makes it 'specialized' is not solely the classification, as Galvak contends, but also the physical characteristics such as diameter and wall thickness. Where these characteristics of ASTM A-787 merchandise are not the same as a commodity product such as standard pipe or fence tubing, it is reasonable to conclude that the merchandise in question is not a commodity product, but a specialized made-to-order product. Since it is not a commodity product, it is reasonable to expect that it will not be used in applications which would be expected for standard pipe or fence tubing. Thus, such merchandise can be reasonably considered to be mechanical tubing which is outside of the scope of the Order.

Galvak states that merchandise stenciled as ASTM A-787 cannot be considered as in-scope merchandise because it has not met certain other requirements such as yield strength, tensile

strength, etc. However, wall thickness is generally an indicator of whether merchandise will meet these requirements. An examination of Attachment 2 in Galvak's August 11, 1998, submission indicates that most of the merchandise produced by Galvak has a lighter wall thickness than that of standard pipe or fence tubing.

Concerning petitioners' comment that the Department should not consider Attachment 2 of the August 11, 1998, submission, we disagree. Attachment 1 of the submission indicates a range of products which Galvak, at that time, was considering for export to the United States. However, given that Galvak also included its product brochure, it is reasonable to assume that Galvak has the ability to manufacture merchandise other than those products listed in Attachment 1. Further, it is possible that Galvak might wish to export some or all of these products at some time. Therefore, it is appropriate to address all of the products which Galvak could produce and may wish to export, rather than confine the analysis to a narrow range of products. The Panel recognized this in its December 18, 2003, remand to the Department by specifically directing the Department to analyze Attachment 2.

As to the petitioners' statement that the Department has erroneously defined the scope of the Order by reference only to the ASTM A-53 standard, to the detriment of fence tubing standards, we disagree. The Department's analysis of the evidence on the record includes standards for both ASTM A-53 and fence tubing in the context of Galvak's August 11, 1998, submission and petitioners' August 28, 1998, submission. Appendices I and II of this redetermination reflect our examination of all evidence on the record, and we have made certain revisions from the draft based on petitioners's comments.

Finally, as stated above, Galvak states that if ASTM A-787 certification is not probative, then the Department would have to rule that any product produced to a non-standard size,

regardless of certification, must be considered as a "specialized, made-to-order product" that is not subject to the Order. In particular, almost all pipe certified to ASTM A-500 specifications would be excluded from the Order.

The Department disagrees with this line of reasoning. As we stated above, there are times when the industry classification is sufficient, as the classification is in direct correlation with the intended/expected uses. Pipe produced to the ASTM A-500 specification is, by nature, structural pipe. Its intended/expected use is for structural applications, which are specifically covered by the scope of the Order. Structural pipe is not a specialized, made-to-order product. Frequently it is pipe which is initially manufactured to meet a higher specification (A-53, API 5-L, etc.) but does not pass the tests for such a specification and is thus downgraded and classified as ASTM A-500. Therefore, unlike tubing classified under ASTM A-787, the industry specification in this case (ASTM A-500) indicates the intended/expected use. Since the industry classification and the intended/expected uses are identical, the physical dimensions of the product are not as critical. Thus, the merchandise classified to ASTM A-500 is within the scope of the Order.

Conclusion

Based on the evidence on the record, and in conformity with the Panel's instructions, the Department determines that Galvak's tubing, stenciled as ASTM A-787, which is not manufactured to the same standard diameters and wall thicknesses of pipe manufactured to ASTM A-53, or fence tubing, is mechanical tubing, and therefore is excluded from the Order. However, Galvak's tubing, stenciled as ASTM A-787, but manufactured to the standard diameters and wall thicknesses of pipe manufactured to ASTM A-53 or fence tubing, is not recognized as mechanical tubing, and therefore is included in the Order. Based on the evidence on the record, certain

products listed in Attachments 1 and 2 of the August 11, 1998, submission are manufactured to standard diameters and wall thicknesses and are thus within the scope of the Order. We have listed those products in Appendix 1 of this redetermination. Should Galvak produce any additional sizes of ASTM A-787 tubing not listed in either Attachment 1 or Attachment 2 of the August 11, 1998 submission, we may be required to re-examine the issue to determine if the new merchandise is within the scope of the Order.

If the Panel affirms this redetermination, we will publish a notice in the Federal Register explaining our findings and the Panel's affirmation of our conclusion.

_____

James J. Jochum
Assistant Secretary
for Import Administration

_____

(Date)

Appendix 1 Galvak Products within the Scope		
Size (In)	Outside Diameter (In)	Wall Thickness (In)
1/2	0.84	0.075 0.105
3/4	1.05	0.075 0.105
1	1.315	0.075
1 1/4	1.66	0.105
1 1/2	1.9	0.090 0.105
1 1/2	2	0.075 0.090 0.120
2	2.375	0.105
3	3.5	0.12

Appendix 2 Galvak Round Products outside the Scope		
Size	Outside Diameter (In or mm)	Wall Thickness (In)
	1/2"	0.030 0.036 0.042 0.048 0.054 0.060
	5/8"	0.030 0.036 0.042 0.048 0.054 0.060
	19 mm	0.036 0.042 0.048 0.054 0.060
	3/4"	0.030 0.036 0.042 0.048 0.054 0.060
	21 mm	0.036 0.042 0.048 0.054 0.060 0.067
1/2"	0.840"	0.048 0.060 0.067 0.090
	22 mm	0.036 0.042 0.048 0.054 0.060 0.067
	7/8"	0.030 0.036 0.042 0.048 0.054 0.060 0.067 0.075

		0.030
		0.036
		0.042
		0.048
		0.054
	15/16"	0.060
		0.030
		0.036
		0.042
		0.048
		0.054
		0.060
		0.067
		0.075
		0.090
	1"	0.105
		0.036
		0.042
		0.048
		0.054
		0.060
		0.067
	26 mm	0.075
		0.060
		0.067
		0.090
3/4"	1.050"	0.120
		0.030
		0.036
		0.042
		0.048
		0.054
		0.060
		0.067
		0.075
	1 1/8"	0.090
		0.030
		0.036
		0.042
		0.048
		0.054
		0.060
		0.067
		0.075
	1 1/4"	0.090
		0.036
		0.042
		0.048
		0.054
		0.060
		0.067
1"	1.315"	0.075

	1 3/8" (1.375")	0.036 0.042 0.048 0.054 0.060 0.067 0.075
	1 1/2"	0.036 0.042 0.048 0.054 0.060 0.067 0.075 0.090 0.105 0.120
	1 5/8" (1.625")	0.036 0.042 0.048 0.054 0.060 0.067 0.075 0.090 0.105 0.120
1 1/4"	1.660"	0.042 0.048 0.054 0.060 0.067 0.075 0.090
	1 3/4"	0.036 0.042 0.048 0.054 0.060 0.067 0.075
	1 13/16"	0.036 0.042 0.048 0.054 0.060 0.067 0.075 0.090 0.105 0.120

		0.036 0.042 0.048 0.054 0.060 0.067 0.075 0.090
	1 7/8" (1.875")	0.105
		0.048 0.054 0.060 0.067
1 1/2"	1.900"	0.075
		0.036 0.042 0.048 0.054 0.060 0.067
	2.000"	0.105
		0.036 0.042 0.048 0.054 0.060 0.067
	2 1/8"	0.075
		0.048 0.054 0.060 0.067
	2 3/16"	0.075
		0.048 0.054 0.060 0.067 0.075 0.090
	2 1/4"	0.105
		0.048 0.054 0.060 0.067 0.075 0.090
2"	2 3/8" (2.375")	0.120

	2 1/2"	0.048 0.054 0.060 0.067 0.075 0.090 0.105 0.120
2 1/2"	2 7/8" (2.875")	0.048 0.054 0.060 0.067 0.075 0.090 0.105
	3"	0.048 0.054 0.060 0.067 0.075 0.090 0.105 0.120
3	3 1/2" (3.5")	0.060 0.067 0.075 0.090 0.105