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April 5, 2017

Mr. Brian Boberg  
Arcadis  
One Seagate, Suite #700  
Toledo, OH 43604

RE: Oregon WTP – Ozone Building  
Waiver Request – Stainless Steel Pipe Fabrication for Ozone System

Dear Brian:

Per the contract documents, we are to provide and install fabricated stainless steel pipe in the Ozone Building for the ozone treatment process. This piping in general connects the liquid oxygen systems to the ozone generators to the diffusion system in the contactor tanks, in addition to de-ozonation and other miscellaneous equipment.

Fabricated stainless steel pipe consisting of fittings and spool pieces could not be detailed and fabricated until for this project until the Ozone System Supplier basic system package was approved which contains the equipment sizing and specific layout requirements. Approved as Noted shop drawings of this basic system was received back from Arcadis on 9/24/16.

After this initial approval, there were then several changes made to the valving requirement within the mechanical piping, which delayed completion of the piping layout. This layout was able to be completed and submitted to Arcadis for review on 12/22/16, whereas an approved as noted copy was returned on 1/11/17. Once we had approved preliminary pipe layout drawings, we forwarded to the piping fabricators for pricing and availability. Quotations utilizing AIS compliant stainless steel pipe and fitting materials were quoted with delivery times of 24 to 28 weeks. It is obvious with these terms that American melt stainless steel piping and fittings are not readily available production items, and therefore “are not produced in the United States in sufficient and reasonably available quantities”. Additionally as such, we would not be able to meet the project completion deadlines due to needing materials for installation in April 2017.

In summary and as stated in the AIS documents, a waiver can be furnished if the items are inconsistent with public interest as well as not produced in the US in sufficient and reasonable quantities. We are therefore requesting a waiver for incorporation of non AIS compliant fabricated stainless steel pipe in the Ozone Building for the ozone treatment process. Documentation from a specified supplier is attached to this letter describing the lead times and unavailability.

Should you need any further information for this waiver request or have any questions please feel free to contact me.

Very truly yours,

**MOSSER CONSTRUCTION, INC.**

Douglas Giesler  
Project Manager

Direct Dial (419) 355-3246  
Fax (419) 334-6911

Enclosure



*Douglas*

*Brothers* Div.

ROBERT MITCHELL CO., INC.

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April 05, 2017

Mosser Construction, Inc.  
122 S. Wilson Ave  
Freemont, OH 43420

Attn: Doug Giesler

**RE: City of Oregon, Ohio  
Oregon HAB/Ozone Improvements  
Ozone Bldg Process Piping**

Dear Doug,

**Subject: Stainless Steel Ozone System Piping  
Conformance to AIS Regulations**

We are writing to provide you with further clarification, back ground, and reasoning associated with our inability to provide you with stainless steel ozone system process piping in conformance with AIS regulations.

**1. Size Range, Wall Thickness:**

Piping required is 4" and smaller with wall thickness of both schedule 10s and 40s. On these smaller diameters, fittings will be **domestic manufacture only**, as manufacturers do not have the volume level and profit margins (mark up) to justify stocking US melt steel products as required by the American Iron and Steel Act.

**2. Lead Time vs Project Schedule:**

AIS compliant pipe is available in these diameters and wall thicknesses, but lead times of up to 16 weeks have been quoted to us. Allowing for shop time required for fabrication into pipe spools, material would not be delivered to the jobsite for 20 to 22 weeks or more. This scenario would be our best attempt at compliance to AIS as the pipe will be domestic melt **and** manufacture, but the fittings used will be **domestic manufacture** made from **foreign melt steel**.

**3. Special Order Fittings to AIS:**

Fitting manufacturers have informed us that special order US melt/manufacture fittings made in small production runs, if at all possible (availability confirmed at time of order), would triple (or more) the normal price and extend lead times to more than 24 weeks.

**4. Pipe and Fittings Non AIS:**

If Mosser Construction is able to obtain a waiver on the AIS requirement for the Ozone building stainless steel process piping systems, we anticipate delivery of shop fabricated pipe spools using foreign material to be 6 to 8 weeks.

As you have become aware, projects with AIS requirements come with added burden as extended lead times and premium pricing are the norm. As suppliers of shop fabricated stainless steel piping products, we take special care when ordering material for these projects. At times, we will not bid on AIS jobs due to the lack of US manufacturing sources for domestic melt and manufactured stainless steel products.

If you have any questions, or should further information be required, please contact me.

Regards,



Michael M Poirier  
Manager Water Piping Projects

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