



UNITED STATES DEPARTMENT OF COMMERCE  
International Trade Administration  
Washington, D.C. 20230

FOR PUBLIC FILE

502  
~~A-570-818~~  
Scope  
Public Document  
OADC:SMM

JUN 15 1992

TO: Mr. John Durant  
Director, Commercial Rulings Division  
Headquarters, U.S. Customs Service

FROM: Edward Yang *EY 6/15/92*  
Division Director  
Office of Antidumping Compliance

SUBJECT: Scope Inquiry on Certain Iron Construction  
Castings from Brazil, Canada, the People's  
Republic of China, and India.

This concerns your memo of November 5, 1991, regarding the scope of the antidumping duty order on certain iron construction castings from the People's Republic of China (PRC). Your memo details Customs' opinion that certain cast iron rings produced by CNI Manufacturers (CNI) are not within the scope of the antidumping duty order on iron construction castings from the PRC.

The CNI cast iron rings are made of grey pig iron and range in size from eight inches to 36 inches in diameter. The weight of each ring ranges from 1.5 pounds to 51 pounds depending on the diameter. The imported rings are further assembled with a cover and skirt to make a containment box for the use with underground storage tanks for gasoline.

The Department points out that the scope of the order covers both heavy castings and light castings. Heavy castings are described as manhole, catch basin, and cleanout sets used for drainage or access purposes for public utility, water, and sanitary systems. Manhole sets, consisting of covers, rings, and frames are further described as weighing from 270 to 1,000 pounds. The scope of the order describes light castings as valve, service, and meter boxes which are placed below the ground to encase water, gas, or other valves, or water or gas meters. With respect to the light castings the order only covers valve, service and meter boxes not the individual components of such boxes.

The Department notes that while the CNI product physically appears similar to the manhole cover rings subject to the relevant order, the light weight of the CNI rings renders them unsuitable for use with manhole covers. Additionally, although the CNI rings are light weight, the scope of light castings covers completed sets not the individual components. Therefore, the Department confirms Customs' opinion that the imported rings



your memo detailed do not appear to fit the description of rings within the scope of the order on iron construction castings from the PRC.

Any interested party may file a request for a formal scope inquiry to: U.S. Department of Commerce, International Trade Administration, Office of Antidumping Compliance, IA Central Records Unit, Room B-009, Attention: Roland MacDonald, 14th Street and Constitution Avenue, N.W., Washington, DC 20230.



CONCURRENCE RECORD

(Prescribed by ITA A.I. 8-1)

ROUTING PURPOSE  
SYMBOLS (RPS)  
C- CONCURRENCES  
S- SIGNATURE

SUBJECT OF DOCUMENT:  
Letter of advice to Customs concerning certain iron rings.  
Case: A-570-818 Iron Construction Castings from the People's Republic of China.

NAME AND OFFICE OF ORIGINATOR

S. Marina McClelland  
Compliance Specialist  
OADC

TELEPHONE NUMBER  
377-4851

DEADLINE DATE

INITIALS DATE  
mm 4/15

SUBMITTED TO:		RPS	INITIALS	DATE	SUBMITTED TO:		RPS	INITIALS	DATE
NAME: UClowe			UC	16 Apr 92	NAME: ZPrimord			Z.P.	4/14/92
OFFICE: OCC			UC	1250.92	OFFICE: OADC				
NAME: MLunn			M.P.	4/16/92	NAME: MSkinner				
OFFICE: OP			M.P.	6/12/92	OFFICE: OADC			C mg	6/12/92
NAME: EYang			EY	6/15/92	NAME:				
OFFICE: Div. Dir. OADC					OFFICE:				
NAME:					NAME:				
OFFICE:					OFFICE:				

ADDITIONAL INFORMATION OR SPECIAL INSTRUCTIONS: (Continue on reverse if necessary)

Dear Marina,  
Why is Customs making changes?  
Let's talk about this. Thanks EY 4/20

Changes per Ed



11-13-95

A-570-502  
SCOPE RULING  
PUBLIC DOCUMENT

FOR PUBLIC FILE

TO: REGIONAL DIRECTORS, COMMERCIAL OPERATIONS, DISTRICT DIRECTORS, AREA AND PORT DIRECTORS

FROM: DIRECTOR, TRADE COMPLIANCE DIVISION

RE: ANTIDUMPING SCOPE RULING ON IRON CONSTRUCTION CASTINGS FROM THE PEOPLE'S REPUBLIC OF CHINA, A-570-502

1. ON AUGUST 28, 1995, IN RESPONSE TO A REQUEST BY JACK'S INTERNATIONAL TRADING ASSOCIATES, LTD., U.S.A. (JACK'S), THE DEPARTMENT OF COMMERCE ISSUED A FINAL SCOPE RULING FINDING THAT CERTAIN CAST IRON INTERIOR FLOOR AREA DRAINS (FLOOR AREA DRAINS), CLASSIFIED UNDER HTSUS NUMBER 7325.10.0050, IS NOT WITHIN THE SCOPE OF THE ANTIDUMPING DUTY ORDER ON IRON CONSTRUCTION CASTINGS FROM THE PEOPLE'S REPUBLIC OF CHINA (PRC), A-570-502.
2. THE COMMERCE DEPARTMENT DETERMINED THAT THE JACK'S FLOOR AREA DRAINS, INCLUDING REMOVABLE GRIDS, ARE NOT CONSTRUCTION CASTINGS USED FOR DRAINAGE OR ACCESS PURPOSES. THEREFORE, THE FLOOR AREA DRAINS ARE NOT WITHIN THE SCOPE OF THE ANTIDUMPING DUTY ORDER COVERING IRON CONSTRUCTION CASTINGS FROM THE PRC. DETAILED DESCRIPTION FOLLOWS.

THIS FUNNEL-SHAPED DRAIN, USED EXCLUSIVELY IN COMMERCIAL RESTAURANTS, ATTACHES TO INTERIOR FLOOR DRAINPIPE, AND DRAINS OFF WATER AND OTHER LIQUIDS. ITS REMOVABLE GRID COLLECTS FOOD PARTICLES FOR LATER REMOVAL. THE DRAIN IS MADE OF CAST IRON, MEASURING AS FOLLOWS:

TOTAL WEIGHT: APPROXIMATELY SIX POUNDS;  
THICKNESS: ONE-QUARTER INCH;  
LENGTH: THREE AND ONE-QUARTER INCHES;  
DIAMETER: ONE END IS APPROXIMATELY SIX AND ONE-QUARTER INCHES; THE OTHER END IS THREE AND ONE-QUARTER INCHES;

GRID: THE GRID COVERS THE WIDER DIAMETER END OF THE DRAIN, AND CONSISTS OF SIX INNER BARS, EACH FIVE-SIXTEENTHS OF AN INCH AND ONE-QUARTER INCH DEEP.

3. EFFECTIVE IMMEDIATELY, TERMINATE SUSPENSION AND LIQUIDATE ALL UNLIQUIDATED ENTRIES, REGARDLESS OF ENTRY DATE, OF THE FLOOR AREA DRAINS, LISTED ABOVE.

4. REFUND ANY CASH DEPOSITS WITH INTEREST AND RELEASE ANY BONDS RELATING TO THE FLOOR AREA DRAINS, LISTED ABOVE.
5. THE REFUND OF CASH DEPOSITS BY THE CUSTOMS SERVICE ON ENTRIES OF THIS MERCHANDISE IS SUBJECT TO THE PROVISIONS OF SECTION 737 OF THE TARIFF ACT OF 1930. SECTION 737 REQUIRES THAT CUSTOMS PAY INTEREST ON OVERPAYMENTS, OR ASSESS INTEREST ON UNDERPAYMENTS, OF THE REQUIRED AMOUNTS DEPOSITED AS ESTIMATED ANTIDUMPING DUTIES. THE INTEREST PROVISIONS ARE NOT APPLICABLE TO BONDS POSTED AS ESTIMATED ANTIDUMPING DUTIES. INTEREST SHALL BE CALCULATED FROM THE DATE OF PAYMENT OF ESTIMATED ANTIDUMPING DUTIES THROUGH THE DATE OF LIQUIDATION. THE RATE AT WHICH SUCH INTEREST IS PAYABLE IS THE RATE IN EFFECT UNDER SECTION 6621 OF THE INTERNAL REVENUE CODE OF 1954 FOR SUCH PERIOD.
6. CONTINUE TO SUSPEND LIQUIDATION OF ENTRIES OF IRON CONSTRUCTION CASTINGS SUBJECT TO THE ANTIDUMPING DUTY ORDER COVERING IRON CONSTRUCTION CASTINGS FROM THE PRC.
7. IF THERE ARE ANY QUESTIONS REGARDING THIS MATTER BY CUSTOMS OFFICERS, THEY SHOULD BE FORWARDED VIA E-MAIL THROUGH THE REGIONAL ANTIDUMPING/COUNTERVAILING DUTY COORDINATOR TO THE TRADE COMPLIANCE DIVISION, ANTIDUMPING/COUNTERVAILING DUTY BRANCH USING THE ATTRIBUTE "HQ OAB." THE IMPORTING PUBLIC AND INTERESTED PARTIES SHOULD CONTACT, JACK K. DULBERGER, ON 202-482-5505, OFFICE OF ANTIDUMPING COMPLIANCE, IMPORT ADMINISTRATION, INTERNATIONAL TRADE ADMINISTRATION, U.S. DEPARTMENT OF COMMERCE.
8. THERE ARE NO RESTRICTIONS ON THE RELEASE OF THIS INFORMATION.

NANCY MCTIERNAN