

Reposting of Special Provision 109S62 to OPSS 905 & SS114-4								
Comments received by TCP#000-0310								
Comment ID	Organization	Comment						MTO's Response
		Reference Spec	Section	MTO Draft Requirement	Industry Position	Industry Impact	Requested Revision	
592-1	OCPA/DECAST	SSP109S26	905.02-References	N/A	The SSP should include the external MTO documents relied upon by the proposed welding and material-certification requirements, including MTO Standard Drawing SS114-4, May 2026 and OPSS.PROV 1440, November 2024.	Including these references will provide a clear basis for the applicable welding, fabrication, and material-certification requirements and help ensure consistent interpretation during design, review, fabrication, and shipment.	Add the following to Clause 905.02 – References:MTO Standard Drawing SS114-4, May 2026 – Precast Rigid Frame Box CulvertOPSS.PROV 1440, November 2024 – Material Specification for Steel Reinforcement for Concrete	As per Standard OPSS.PROV drafting rules, the SSD references are not included in OPSS.PROV
592-2		SSP109S26	905.03-Definition	Resistance Welding is defined; however, welds are not distinguished by their purpose.	Add definitions that distinguish welds by purpose, in addition to the existing definition of Resistance Welding by process.	Without this distinction, welds permitted for fabrication under MTO Standard Drawings may be subject to the same project-specific requirements as welds relied upon for structural resistance, creating unnecessary clarification, review, and potential production delays.	Add the following definitions: Resistance Fabrication Weld (Fabrication Note 1): allows resistance welding Fabrication Support Weld (Fabrication Note 2 Weld): means welding a spacer, as permitted by SS114-4, May 2026, Fabrication Note 2, to AS5 and AS6, or welding to sacrificial bars provided in addition to the reinforcement cage bars. Structural or Project-Specific Weld: means a weld relied upon for structural resistance, load transfer, or otherwise requiring project-specific engineering approval.	Additional definitions are not required, the notes provided on SS114-4 allows for welding of the box culvert without project specific approval. Other welding, other than resistance welding, requires Owner approval.
592-3		SSP109S26	905.04.01.04.01-General	Amendment to the welding requirements of OPSS.PROV 905, November 2024, beginning with: "When welding of reinforcing steel bars is permitted..."	The amended clause should apply the weld definitions proposed under Clause 905.03 so the submission requirements reflect the purpose of the weld. Structural or Project-Specific Welds should remain subject to project-specific engineering requirements; Fabrication Note 2 Welds should follow the applicable qualified fabrication procedure; and Resistance Welding should remain governed separately by Clause 905.04.01.04.02.	OPSS.PROV 905, November 2024 does not distinguish welding requirements by weld purpose. With the proposed SSP introducing additional permitted welding, this distinction is needed to avoid applying structural-weld submission requirements to fabrication welds permitted by SS114-4, May 2026, Fabrication Note 2. Without clarification, this could create unnecessary engineering review, Contract Administrator clarification, and production delays without additional quality or structural benefit.	Revise Clause 905.04.01.04.01 to apply the weld definitions added under Clause 905.03. Require project-specific welding details for Structural or Project-Specific Welds. Fabrication Support Weld (Fabrication Note 2 Weld):, maintain applicable recurring welding procedures and qualifications through the MTO DSM/fabricator qualification process, with resubmission only when a relevant qualification parameter changes.	The Clause is clear on what MTO is intended to allow for the welding. We do not see any need to update the wording. This is standard for all fabricators on MTO projects, and submission of the required documents has always been a requirement. In the future, MTO will consider creating a DSM list for qualified fabricators approved for welding to reduce project specific submission requirements.
592-4		SSP109S26	905.04.01.04.01-General-Submission Timing	Third Paragraph : The welding details shall be submitted to the Contract Administrator at least 7 Days prior to the commencement of steel reinforcement welding	Industry supports providing the required welding information; however, a single fixed 7-Day advance submission is not practical for information that is only confirmed during fabrication, particularly project-specific material certification. Submission timing should reflect when each type of information becomes available.	Meeting the 7-Day requirement for project-specific material information could require manufacturers to reserve and segregate reinforcement before the shop drawings is approved. This would require allocation and segregation of rebar, seperate storage area, handling, inventory control, and production constraints. For steel manufactures on DSM list this requirement will convert otherwise compliant DSM manufacturers in administrative non-compliance without improving material traceability or weld quality.	Remove the fixed 7-Day submission requirement prior to commencement of steel reinforcement fabrication and align submission timing with when the required information becomes available. Information shown on sealed Working Drawings should continue to be provided through the normal drawing approval process. Recurring welding procedures and qualifications should be maintained through the applicable MTO DSM/fabricator qualification process. Project-specific mill/material certificates for the reinforcement actually incorporated into the finished precast product should be submitted with the precast report prior to shipment, consistent with the applicable OPSS.PROV 1440, Nov 2024 Clause 1440.04.01.01 reporting framework.	In the future, MTO will consider creating a DSM list for qualified fabricators approved for welding to reduce project specific submission requirements.

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592-5		SSP109S26	905.04.01.04.01-General	a) Materials certificates confirming the compatibility and weldability of steel reinforcement to be welded;	Material certificates should relate to the reinforcement actually incorporated into the product, rather than material tentatively allocated before fabrication.	The applicable heat and material certificates may only be confirmed during fabrication. Requiring advance submission would require project-specific reservation and segregation of reinforcement, with the storage, handling, inventory-control, and scheduling impacts identified under 905.04.01.04.01 General -Submission Timing.	Require the applicable mill/material certificates for the reinforcement actually incorporated into the product to be submitted prior to shipment, consistent with OPSS.PROV 1440, Nov2024, Clause 1440.04.01.01.	Mill test certificates to be submitted according to the SP. If additional material is incorporated into the final product, those mill test certificates are to be submitted at the of fabrication time. This process does not prevent the fabricator from moving forward and should not impact the schedule. The documentation is submitted to the CA for information purposes.
592-6		SSP109S26	905.04.01.04.01(b)	b) Welding procedures. For reinforcement manufactured by the quenched and self-tempered (QST) method a successful welding procedure qualification tests using bars of the same manufacturing method shall be submitted;	This is a welding procedure qualification requirement, not a project-specific production requirement. Once a welding procedure has been successfully qualified by CSA weld Engineer for the applicable reinforcement size and grade, the qualification remains valid across Contracts . For DSM-approved fabricators, current welding procedure qualifications should be maintained through the applicable MTO DSM/fabricator qualification process rather than resubmitted for each Contract.	Repeated submission of the same unchanged welding procedure qualification for each Contract creates unnecessary administrative effort for both Industry and MTO without providing additional assurance of weld quality or structural performance. The wording of MTO requirement also requires clarification because QST is a reinforcing-bar manufacturing method, not a welding process.	Establish a qualification-based submission system whereby welding procedure qualification documentation is maintained through the applicable MTO DSM/fabricator qualification process and resubmitted only when a relevant qualification parameter changes. Remove the QST-specific wording, highlighted in red, and require submission of the welding procedure applicable to the reinforcement bar size and grade being welded.	In the future, MTO will consider creating a DSM list for qualified fabricators approved for welding to reduce project specific submission requirements. The welding of QST bars is not adequately addressed in the code at this time, so the wording in the SP will remain until the code is updated to include differences in the manufacturing process of the bars.
592-7		SSP109S26	905.04.01.04.01(d)	d) Location, and type of welds, weld sizes; and	The information required under Item (d) should be applied according to the weld classifications proposed under Clause 905.03. Resistance Welding associated with Fabrication Note 1, Fabrication Note 2 Welds, and Structural or Project-Specific Welds can be identified on the sealed Working Drawings and addressed according to their intended purpose. For Fabrication Note 2 Welds, the Working Drawings should specify the required spacer spacing or maximum spacing, as determined by the Engineer, rather than the exact location of each individual spacer weld.	Treating Item (d) as a separate submission from the sealed Working Drawings creates unnecessary duplication and the risk of conflicting requirements. Reinforcement cages are fabricated in accordance with the approved Working Drawings; therefore, the applicable welding requirements should be established through the same drawing process.If Item (d) is reviewed separately or later, a cage fabricated to an approved Working Drawing could subsequently be considered non-compliant, resulting in clarification, rework, or production delays.The Working Drawings should therefore identify the applicable welding requirements by weld type: Resistance Welding layouts, Fabrication Note 2 Welds through specified spacer or sacrificial-bar spacing, and Structural or Project-Specific Welds through the required project-specific details.	Incorporate the requirements of Item 905.04.01.04.01(d) into the sealed Working Drawing submission process rather than require a separate welding-detail submission.The Working Drawings should identify, as applicable:Resistance Welding layouts;Fabrication Support Weld (Fabrication Note 2 Weld);, by specifying the required spacer or sacrificial-bar spacing; andStructural or Project-Specific Welds, with the required project-specific weld details.This would establish a single approved source for reinforcement fabrication and avoid conflicting requirements, duplicate review, and potential non-compliance after cage fabrication.	The working drawings form one part of the welding details submission, and would identify the bars, weld location, types, etc. Other parts of the welding details like material test certificates, welding procedures, etc. would also need to be submitted on a project by project basis. In the future, project specific submission requirements may be reduced if MTO creates a DSM list for qualified fabricators.
592-8		SSP109S26	905.04.01.04.01(e)	Operating procedures for machine operated welding system.	The machine operating procedure is a fabricator/process-level control and should not be resubmitted for each Contract where the equipment, welding procedure, and relevant operating parameters remain unchanged.	Repeated submission of the same unchanged procedure creates unnecessary administrative effort for both MTO and steel reinforcement fabricators without providing additional quality or structural assurance.	Maintain the current machine operating procedure through the applicable MTO DSM/fabricator qualification process. Require resubmission only when the equipment, welding procedure, or another relevant operating/qualification parameter changes.	In the future, project specific submission requirements may be reduced if MTO creates a DSM list for qualified fabricators.
592-9		SSP109S26	905.04.01.04.02 Resistance Welding	Resistance welding details shall be submitted to the Contract Administrator at least 7 Days prior to the commencement of steel reinforcement fabrication.	Industry supports providing the required resistance-welding documentation; however, not all project-specific information is available 7 Days prior to the commencement of steel reinforcement fabrication. Submission timing should reflect when each required document is actually available.	The fixed 7-Day advance requirement could place otherwise compliant reinforcement fabricators in administrative non-compliance where required project-specific information is not yet available. The related material-allocation and storage impacts are addressed under 905.04.01.04.01 General Submission Timing.	Remove the fixed requirement to submit all resistance-welding information 7 Days prior to the commencement of steel reinforcement fabrication and establish submission timing by document type. Recurring process and qualification information should be maintained through the applicable MTO DSM/fabricator qualification process. Project-specific	Mill test certificates to be submitted according to the SP. If additional material is incorporated into the final product, those mill test certificates are to be submitted at the of fabrication time. In the future, project specific submission requirements may be

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592-10		SSP109S26	905.04.01.04.02 Resistance Welding	a) Material certificates confirming the compatibility and weldability of carbon steel bars to be welded;	Material certificates should relate to the reinforcement actually incorporated into the finished product, rather than material tentatively allocated before fabrication.	The applicable heat and material certificates may only be confirmed during fabrication. For resistance-welded mats, reinforcement coils are loaded onto the machine and used to produce mats for multiple projects within the same production day. As a result, coils cannot always be assigned to a specific project seven days in advance, and the applicable heat number may change from one coil to the next.Producing and storing all mats for a project in advance solely to meet the 7-Day submission requirement is also not practical due to limited manufacturing and storage space. Therefore, the required project-specific material information may not be available 7 Days prior to the commencement of steel reinforcement fabrication, even where full material traceability is maintained during production.	Require the applicable mill/material certificates for the reinforcement actually incorporated into the finished product to be submitted prior to shipment, consistent with OPSS.PROV 1440, Nov2024, Clause 1440.04.01.01.	Mill test certificates to be submitted according to the SP. If additional material is incorporated into the final product, those mill test certificates are to be submitted at the time of fabrication. In the future, project specific submission requirements may be reduced if MTO creates a DSM list for qualified fabricators.
592-11		SSP109S26	905.04.01.04.02 Resistance Welding	b) Machine operating procedure, detailing the bar layout process and critical parameters used during the resistance welding process, including welding current, force, and time; and	Item (b) should be separated into three distinct requirements:1. Machine operating procedure2. Bar layout process3. Critical resistance-welding parameters, including welding current, force, and timeFor Items (1) and (3), Industry supports demonstrating that the applicable procedures and parameters are established and qualified. These are fabricator/process-level controls and should not require repeated Contract-by-Contract submission where the equipment, welding procedure, and relevant operating parameters remain unchanged.Once the SOP and applicable resistance-welding parameters have been established, resubmitting the same information for each Contract provides no additional technical assurance.Item (2), bar layout, is project-specific and should be addressed through the sealed Working Drawings submitted to the CA, rather than through a separate resistance-welding submission.	Combining the machine operating procedure, bar layout, and critical welding parameters into one Contract-specific submission creates unnecessary duplication and can cause confusion over which information is project-specific and which is controlled at the fabricator/process level. Requiring unchanged SOPs and qualified welding parameters to be resubmitted for each Contract adds administrative effort for both MTO and Industry without improving weld quality or structural performance. The bar layout is already controlled through the sealed Working Drawing process, so requiring it again as part of a separate resistance-welding submission duplicates the same project-specific information.	Revise Item (b) by separating it into three requirements: (1) machine operating procedure; (2) bar layout process; and (3) critical resistance-welding parameters, including current, force, and time. Maintain Items (1) and (3) through the applicable MTO DSM/fabricator qualification process, with resubmission only when a relevant process or qualification parameter changes. Require Item (2) to be provided through the sealed Working Drawing submission process.	In the future, project specific submission requirements may be reduced if MTO creates a DSM list for qualified fabricators.
592-12		SSP109S26	905.04.01.04.02 Resistance Welding	Test reports demonstrating that fabricated mats are in accordance with ASTM A184 and CSA G30.18, Table 4 and 5. The completed tests shall be as follows:	Industry supports the required testing. These test reports are qualification records for the resistance-welding process, not project-specific production records, where the applicable bar size, grade, welding process, and relevant qualification parameters remain unchanged.	Requiring the same valid qualification test reports to be resubmitted for every Contract creates unnecessary administrative effort for both MTO and Industry without providing additional assurance of weld quality or mat performance.	Establish a qualification-based submission system whereby valid test reports are maintained through the applicable MTO DSM/fabricator qualification process and remain valid across Contracts for the applicable qualification conditions. Require resubmission only when the specified validity period expires or a relevant qualification parameter changes.	Tests reports need to be completed within 6 months as per the SP and must be submitted on a project specific basis. This process may change after a DSM list becomes available.
592-13		OPSS 905 Nov 2024	905.03 Definition	No definition is provided for Steel Reinforcement Schedule.	A definition would clarify that a Steel Reinforcement Schedule is a reinforcement detailing document and should not be confused with a production or fabrication schedule.	Without a definition, the term may be interpreted inconsistently, particularly regarding whether it refers to reinforcement details or the timing/sequencing of reinforcement fabrication.	Add the following definition: Steel Reinforcement Schedule means a structured list or table identifying the reinforcing steel required for a concrete or precast concrete element, including the applicable bar marks, sizes, quantities, grades, lengths, spacing, and bending dimensions, as applicable.	This is terminology have been in OPSS 905 for a very long time. Clause 905.04.01.01.02 clearly specifies the requirements. We may revisit this for future upadte of OPSS 905.

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593		No. 109S62/SS114-4	Fabrication Notes				There is no linking reference between the “Fabrication Notes” given on dwg SS114-4 into document Special Provision No. 109S62. Is the SSP only intended for resistance welding? Further to the point above, the notation in 905.04.01.04.01 General: “ Tack welding of steel reinforcement is not permitted.” could be contradictory to the following reference in 905.04.01.04.01 per, “When welding of reinforcing steel bars is permitted, welding details shall...” 905.04.01.04.01 General General requirements for welding details to be submitted at least 7 Days prior to the commencement of steel reinforcement welding will create logistical complications with reinforcing material supplied for plant manufacturing on various dates when stock requires replenishing. A component of precast could have multiple supplies of reinforcing on different days from the sample approved reinforcing supplier. There is no reference clause in this SSP that pertains to WWR. Why is WWR listed as part of 905.07.02 ? Is there a specification that pertains to Welded Wire Reinforcing?	As per Standard OPSS.PROV drafting rules, the SSD references are not included in OPSS.PROV or SSPs. The contract drawing has precedence of the SP according to the General Conditions of Contract. Tack welding is not permitted however welding identified on the contract documents done with approved welding procedures is allowed. Tack welding according to CSA W186 has been replaced with the concept of welding of non-load bearing joints. In the future, project specific submission requirements may be reduced if MTO creates a DSM list for qualified fabricators. WWR provisions are covered in OPSS 905.