



July 26, 2018

The Honorable Wilbur L. Ross, Jr.
Secretary of Commerce
Regulatory Policy Division, Bureau of Industry and Security
U.S. Department of Commerce, Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

Re: Opposition to Athanor Steel, LLC Section 232 Requests for Exclusion

Dear Mr. Secretary:

On behalf of the American Line Pipe Producers Association (“ALPPA”) (and its individual members American Steel Pipe, Berg Pipe, Dura-Bond Industries and Stupp Corporation), we are writing to oppose the requests by Athanor Steel, LLC for 22 exclusions from the remedies imposed pursuant to the Section 232 National Security Investigation of Steel Imports for imported Korean pipe produced by Histeel Company, Ltd.¹

Athanor has failed to demonstrate that its requested exclusions are necessary or warranted. To the contrary, granting Athanor’s requests would further encourage the use of imported steel pipe in the United States, discouraging the use and growth of U.S. steel pipe production capacity and undermining U.S. national security. Indeed, granting these requested exclusions would be directly contrary to the purpose underlying the President’s decision to impose Section 232 remedies.

Contrary to Athanor’s claims, ample supplies of API 5L longitudinal submerged arc welded (“LSAW”) steel pipe in all of the identified diameters and wall thicknesses, using 100% full length cold expansion process to 1.2% - 1.5% of the pipe’s outside diameter, are readily available from domestic sources. Both Berg and Dura-Bond can make these products using this process in the United States, and other U.S. producers can make substitutable products.

Many of these domestic mills are either idle or on a one-shift operation with plenty of available capacity to produce this pipe in a timely manner. However, Athanor decided to purchase

¹ The regulations.gov identification numbers for Athanor’s requests are BIS-2018-0006-18943, BIS-2018-0006-18945, BIS-2018-0006-18951, BIS-2018-0006-19042, BIS-2018-0006-19044, BIS-2018-0006-19049, BIS-2018-0006-19062, BIS-2018-0006-19069, BIS-2018-0006-19079, BIS-2018-0006-19081, BIS-2018-0006-19084, BIS-2018-0006-19088, BIS-2018-0006-19092, BIS-2018-0006-19101, BIS-2018-0006-19103, BIS-2018-0006-19109, BIS-2018-0006-19110, BIS-2018-0006-19537, BIS-2018-0006-19578, BIS-2018-0006-19599, BIS-2018-0006-19669, and BIS-2018-0006-19694.

imported pipe from Histeel in Korea based on price and price alone. In fact, it did not even request quotes for this pipe from U.S. LDWP producers.

As such, there are readily available domestic products that are substitutable for those subject to Athanor's requests for an exclusion from the Section 232 remedies. Moreover, ALPPA notes that Athanor is requesting exclusions for pipe from Korea, which is subject to a quota, and not a tariff, under Section 232. For these reasons, Athanor's requests should be denied.

Sincerely,

Mike O'Brien, Vice President
American Cast Iron Pipe Company,
parent of American Steel Pipe

Jason Norris, President
Dura-Bond Industries

Ingo Riemer, President and CEO
Berg Steel Pipe Corp./Berg Spiral Pipe Corp.

John Stupp, CEO
Stupp Corporation