



**Section 232 National Security Investigation
Of Imports of Steel**

**Written Submission On Behalf Of
The Stainless Steel Tube Trade Advancement Committee**

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The following comments are submitted on behalf of the Stainless Steel Tube Trade Advancement Committee (SSTTAC). The SSTTAC is comprised of U.S. producers of seamless stainless steel pipe and tube. The SSTTAC promotes domestic manufacturing of high quality seamless stainless steel tubing. To assure quality products in the marketplace, SSTTAC member companies produce tubing to industry and consumer specifications in accordance with guidelines and requirements of accreditation societies. A list of the member companies is attached to this submission.

How Seamless Tubing Is Made

Seamless tubular products are made by one of two hot forging processes, rotary piercing and rolling, or extruding. Tubular products that required tighter tolerance, special surface finish and other controlled properties are usually further subjected to a cold rolling, pilgering or drawing operation.

Stainless Seamless Steel Tubing Advantages Over Bar Stock

When the machining of a part involves drilling a center hole for its entire length, it should be carefully considered as a potential application for seamless steel mechanical tubing. This can cover a wide range of products from shotgun barrels and hydraulic piston rods to automotive transmission gears and pump shaft sleeves.

A tube already has the center hole, and the elimination of drilling in the machining sequence can lead to substantial reductions in machine time. In addition, there will be fewer chips with tubing, so there will be less expense for collecting, cleaning and handling of machining waste.

The seamless tubing will weigh less than a comparable size solid bar, which means lower shipping costs from the mill or steel service center to the shop, and the tubes may be easier to load to the machine tool. Also, because of lighter weight, starting stock could possibly be longer, and this translates into more parts, fewer stub ends, or “shorts.”

Seamless tubes are suitable for demanding applications where maximum corrosion resistance or mechanical integrity are required.

Examples of Defense Applications

- Military aircraft
- Submarine
- Navy ships
- Nuclear equipment and fuel elements
- Manufacturing of special chemicals like nitric acid

Examples of Seamless Stainless Steel Tubing Commercial Applications Which Contribute to the National Defense

- Tubes for heat exchangers and reactors in chemical, petrochemical and refineries
- Tubes for thermo power plants
- Tubes for nuclear equipment
- Tubes for high temperatures in steel production

The Domestic Industry Must Be Competitive And Financially Healthy To Support Defense Needs

The SSTTAC was founded to promote fair trade of seamless stainless steel and nickel-based alloy pipe and tube in the United States market, to identify and remedy unfair trade practices such as dumping and government subsidization of foreign producers, and to work with the United States government authorities to assure enforcement of the trade laws of the United States and the rules of the World Trade Organization.

It is important to recognize that the underlying commercial viability of SSTTAC member companies is essential to their ability to produce the high quality products which serve defense applications. Our companies could not survive solely to serve the defense market, which consumes

a relatively small fraction of our production. In order to serve Defense Federal Acquisition Regulation Supplement (DFARS) requirements, our companies must be commercially healthy.

U.S. Seamless Stainless Pipe And Tube Manufacturers Are Technically Equipped To Meet Most Requirements For Defense Purposes And The Domestic Industry

- U.S. seamless tube and pipe manufacturers have the capability to provide most products required by the domestic industry, including redraw hollows, cold finished tubing, hot and cold finished pipe and mechanical tubing.
- The starting material for producing finished seamless stainless steel and nickel alloy pipes and tubes is typically a product called “redraw hollows” or “hollow profiles.”
- For defense purposes, the installed capacity in the U.S. satisfies the majority of the domestic demand for hot and cold finished tubular products, both redraw hollows and finished products in stainless steel and nickel based alloys.
- Because a proper balance in the supply chain is necessary to keep the industry healthy, the Administration should include in any remedy a means to obtain exclusions for those situations in which it is demonstrated that domestic capacity and technical constraints create circumstances whereby it is necessary to supplement domestic production with certain imported materials.

Conclusion

The member companies of the SSTTAC deeply appreciate the initiative and foresight of the U.S. Department of Commerce in undertaking this important investigation. We will be pleased to consult with appropriate personnel in the Department of Commerce and other agencies as this investigation continues.

**MEMBERS OF THE
Stainless Steel Tube Trade Advance Committee**

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HandyTube Corporation
Camden, Delaware

Plymouth Tube Company
Warrenville, Illinois

Salem Tube, Inc.
Greenville, Pennsylvania

Salzgitter Mannesmann Stainless Tubes
Houston, Texas

Sandvik Materials Technology
Clarks Summit, Pennsylvania