

Steel Tank Institute-Steel Plate Fabricators Association

May 30, 2017

Brad Botwin, Director, Industrial Studies

Office of Technology Evaluation

Bureau of Industry and Security

U.S. Department of Commerce

1401 Constitution Ave. NW, Room 1093

Washington, DC 20230

RE: Comments on Section 232 National Security Investigation of Imports of Steel

Dear Mr. Botwin:

On behalf of the members of the Steel Tank Institute-Steel Plate Fabricators Association (STI-SPFA), I submit these comments pursuant to your office's request for public comments regarding Section 232 National Security Investigation of Imports of Steel.

STI-SPFA is a trade association representing steel plate fabricators and their suppliers. Member companies produce steel storage tanks, field erected water tanks, pressure vessels and heat exchangers, and pipe and pipelines. Their customers are from the petrochemical, power generation, food, pharmaceutical, fuels, wastewater, and water transmission industries.

I ask you to consider that not only is there need for concern about imported steel's impact on national security, but that attention should also be given to the impact of its anti-competitive effect on domestic producers of completed steel products.

For example, members of STI-SPFA who fabricate pressure vessels (commonly used in the petroleum products industry) are telling us that they have seen an increase in completed pressure vessels entering the U.S. at lower prices than they can offer. The likelihood is that these imported vessels are made from

cheaper steel and with cheaper labor. As a result, U.S. pressure vessel fabricators are at a competitive disadvantage.

Steel plate fabricators create products vital to our national security infrastructure, such as equipment for petroleum break-down to useable fuels, tanks for fuel storage, piping for fuel distribution, and delivery storage systems.

Should the import of foreign steel products cause fabrication businesses to decline or fail, our nation's security is compromised by loss of domestic capability and specialized skills required to manufacture products vital to our infrastructure and national security needs.

Thank you for your consideration of these comments related to Section 232 National Security Investigation of Imports of Steel. A hard copy of this email follows via US Mail. If I can be of assistance in your investigation, don't hesitate to contact me.

Sincerely,

Wayne B. Geyer

Executive Vice President

847-550-3829

STI-SPFA

944 Donata Court

Lake Zurich IL 60047