

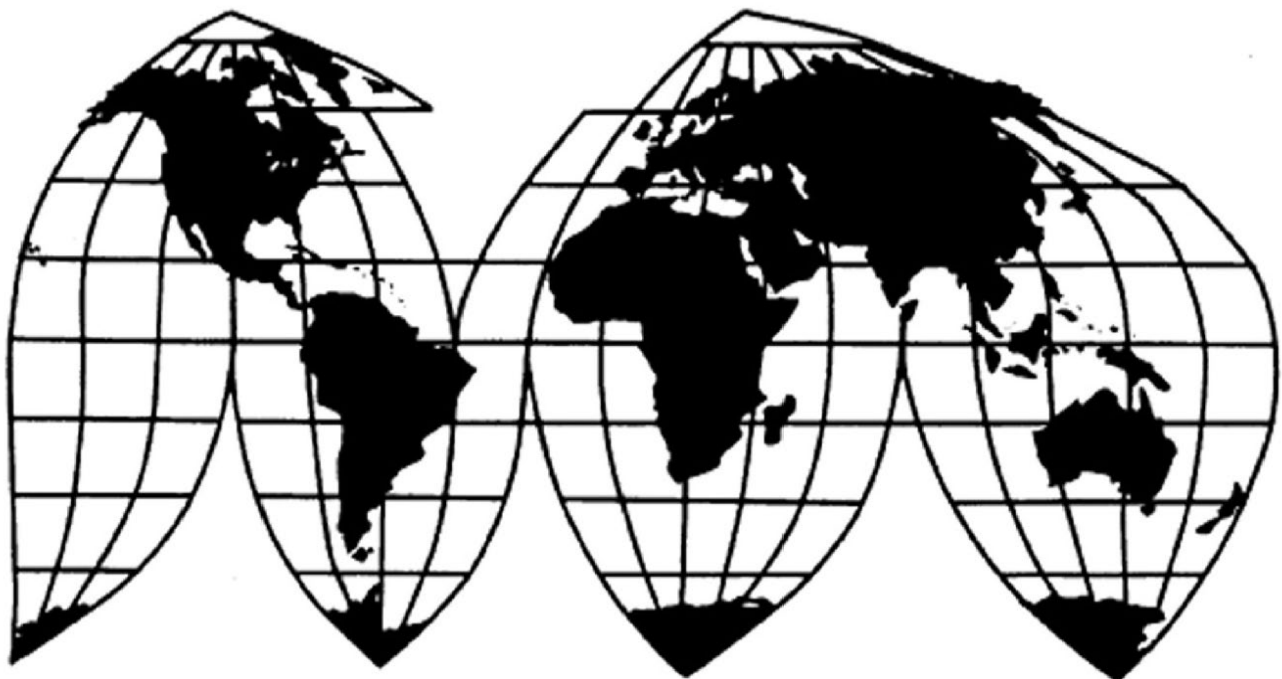
# **Chromium Trioxide from India and Turkey**

Investigation Nos. 701-TA-779 and 731-TA-1765-1766 (Preliminary)

**Publication 5968**

**January 2026**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([ ]) in confidential reports and is deleted and replaced with asterisks (\*\*\*) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.



# UNITED STATES INTERNATIONAL TRADE COMMISSION

701-TA-779 and 731-TA-1765-1766 (Preliminary)

Chromium Trioxide from India and Turkey

## DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of chromium trioxide from India and Turkey, provided for in subheading 2819.10.00 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and imports of the subject merchandise from India that are alleged to be subsidized by the government of India.<sup>2</sup>

## BACKGROUND

On September 29, 2025, American Chrome & Chemicals, Inc., Canonsburg, Pennsylvania, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of chromium trioxide from India and LTFV imports of chromium trioxide from India and Turkey. Accordingly, effective September 29, 2025, the Commission instituted countervailing duty investigation No. 701-TA-779 and antidumping duty investigation Nos. 731-TA-1765-1766 (Preliminary).

Notice of the institution of the Commission’s investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of October 2, 2025 (90 FR 47820).<sup>3</sup> The Commission conducted its

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<sup>1</sup> The record is defined in § 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

<sup>2</sup> Unpublished Federal Register Notices, Department of Commerce, EDIS Document ID 867704, retrieved December 31, 2025.

<sup>3</sup> Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in subsequent notices

conference on December 4, 2025. All persons who requested the opportunity were permitted to participate.

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published in the Federal Register on November 11 (90 FR 52096), December 18 (90 FR 59203), and December 30 (90 FR 61167).

## Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of chromium trioxide from India and Turkey that are allegedly sold in the United States at less than fair value (“LTFV”) and subsidized by the government of India.

### I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.<sup>1</sup> In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”<sup>2</sup>

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<sup>1</sup> 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); see also *American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

<sup>2</sup> *American Lamb Co.*, 785 F.2d at 1001; see also *Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

## II. Background

**Parties to the Investigation.** The petitions in these investigations were filed on September 29, 2025, by American Chrome & Chemicals, Inc. (“ACC” or “Petitioner”).<sup>3</sup> ACC appeared at the staff conference with counsel and submitted a postconference brief.<sup>4</sup> Two respondent entities participated in the investigations. Kobitex Inc. (“Kobitex”), a U.S. importer of subject merchandise from Turkey, appeared at the staff conference with counsel and submitted a postconference brief.<sup>5</sup> Koppers Inc. (“Koppers”), a U.S. importer of subject merchandise from India and U.S. purchaser of chromium trioxide from other sources, appeared at the staff conference with counsel and submitted a postconference brief.<sup>6</sup>

**Data Coverage.** The period of investigation (“POI”) in the preliminary phase of these investigations is January 2022 through September 2025. U.S. industry data are based on the questionnaire response of ACC, which accounted for all known U.S. production of chromium trioxide in 2024.<sup>7</sup> U.S. import data are based on questionnaire responses of five firms that account for essentially all imports of chromium trioxide in 2024.<sup>8</sup> Foreign industry data are based on questionnaire responses from one firm in India (Vishnu) estimated to account for \*\*\*

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<sup>3</sup> Petition, Volume 1, EDIS Doc. 863217 (Sept. 29, 2025) (“Petition”). The initial schedule of these investigations was based on the date of the filing of these petitions, September 29, 2025. 90 Fed. Reg. 47,820 (Oct. 2, 2025). Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised the schedule of these preliminary determinations. *See* 90 Fed. Reg. 52,096 (Nov. 19, 2025); 90 Fed. Reg. 59,203 (Dec. 18, 2025). Following the President’s executive order closing federal agencies on December 24, 2025 and December 26, 2025, the Commission again revised the schedule of these investigations. 90 Fed. Reg. 61,167 (Dec. 30, 2025).

<sup>4</sup> Petitioner Postconf. Br., EDIS Doc. No. 866115 (Dec. 9, 2025) (“Petitioner Br.”).

<sup>5</sup> Kobitex Postconf. Br., EDIS Doc. No. 866094 (Dec. 9, 2025) (“Kobitex Br.”).

<sup>6</sup> Koppers Postconf. Br., EDIS Doc. No. 866118 (Dec. 9, 2025) (“Koppers Br.”).

<sup>7</sup> Confidential Staff Report (“CR”), INV-XX-146 (December 19, 2025); Public Report, *Chromium Trioxide from India and Turkey*, Inv. Nos. 701-TA-779 and 731-TA-1765-1766 (Preliminary), USITC. Pub. 5968 (January 2026) (“PR”) at 1.4.

<sup>8</sup> CR/PR at 1.4 & 4.1 n.2.

percent of production in that country, and one firm in Turkey (Sise) estimated to account for essentially all production in that country.<sup>9</sup>

### III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>10</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>11</sup> In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”<sup>12</sup>

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.<sup>13</sup> Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the

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<sup>9</sup> CR/PR at Table 7.1 & 7.2.

<sup>10</sup> 19 U.S.C. § 1677(4)(A).

<sup>11</sup> 19 U.S.C. § 1677(4)(A).

<sup>12</sup> 19 U.S.C. § 1677(10).

<sup>13</sup> 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

Commission’s like product analysis.”<sup>14</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>15</sup> The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.<sup>16</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>17</sup> The Commission looks for clear dividing lines among possible like products and disregards minor

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<sup>14</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); see also *Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>15</sup> *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

<sup>16</sup> See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

<sup>17</sup> See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

variations.<sup>18</sup> The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.<sup>19</sup>

#### **A. Scope**

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as follows:

The merchandise subject to these investigations is chromium trioxide (Chemical Abstracts Services (“CAS”) registry number 1333-82-0), regardless of form (dry or solution). Chromium trioxide is an inorganic compound with the molecular formula  $\text{CrO}_3$  in dry form and  $\text{H}_2\text{CrO}_4$  in solution form. All relevant formulas refer to the same product with one unit of chromium (as Cr+6) and three units of oxygen, such as  $\text{Cr}_4\text{O}_{12}$  and  $\text{Cr}_{0.25}\text{O}_{0.75}$ .

The product in dry form is generally referred to as chromium trioxide, which is the acidic anhydride of chromic acid. Chromium trioxide in solution form may be referred to as chromic acid. However, the dry form may also be marketed under the name chromic acid.

A non-exhaustive list of other names used for the subject merchandise includes: chromic anhydride, chromic trioxide, chromium (VI) oxide, monochromium trioxide, chromia, chromium (VI) trioxide, trioxochromium, and chromtrioxid. A non-exhaustive list of trade names for the subject merchandise includes 11910080KROMSAV-ANHIDRID IP, Aktivkohle, impragniert, Typ PLWK, Chromsaure, and Chroomzuur.

All chromium trioxide is covered by the scope of these petitions irrespective of purity, particle size, or physical form. Chromium trioxide is generally imported in dry form, including in the form of pellets, flakes,

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<sup>18</sup> See, e.g., *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

<sup>19</sup> See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, co-extensive with the scope).

powders, or beads, but the scope includes chromium trioxide in solution form.

Chromium trioxide that has been blended with another product or products is included in the scope if the resulting mix contains 90 percent or more of chromium trioxide by total formula weight, such as chromium trioxide mixed with a catalyst to make the product ready for use in metal finishing applications. If chromium trioxide is imported blended with another product, only the chromium trioxide content of the blend is included within the scope.

Subject merchandise also includes chromium trioxide that has been processed in a third country into a product that would otherwise be within the scope of investigation, *i.e.*, if any such further processing would not otherwise remove the merchandise from the scope of the investigation it is included in the investigation, including blending, flaking, mixing with water, or packaging. For example, the dry form of the subject merchandise may be imported into a third country and then processed into solution before shipment to the United States. Such a solution would be subject to the scope.

The subject merchandise is provided for in subheading 2819.10.0000 of the Harmonized Tariff Schedule of the United States (“HTSUS”). In addition to 1333-82-0, import documentation may also reflect CAS registry numbers 12324-05-9, 12324-08-2, and 1362947-20-3. Although the HTSUS subheadings and CAS registry numbers are provided for convenience and customs purposes, the written description of the scope is dispositive.<sup>20</sup>

Chromium trioxide is a strong oxidizing agent that primarily exists in flake, crystalline, or granular forms, and must be dissolved in water or sulfuric acid before being utilized in most applications.<sup>21</sup> Chromium trioxide in dry form is a known carcinogenic, and in solution is volatile and hazardous to transport, and as such, is subject to strict rules of handling by the Environmental Protection Agency, Occupational Safety and Health Administration, and

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<sup>20</sup> *Chromium Trioxide from India: Initiation of Countervailing Duty Investigation*, 91 Fed. Reg. 240 (Jan. 5, 2026); *Chromium Trioxide From India and the Republic of Türkiye: Initiation of Less-Than-Fair-Value Investigations*, 91 Fed. Reg. 234 (Jan. 5, 2026). Commerce’s scope in its initiation notices includes certain clarifications and revisions from the scope in the petitions.

<sup>21</sup> CR/PR at 1.9-1.10.

Department of Transportation.<sup>22</sup> Chromium trioxide has two primary end uses: wood treatment and metal finishing.<sup>23</sup> In wood treatment, chromium trioxide is used in producing chromated copper arsenate (“CCA”), which provides a finish to wood for outdoor use that protects wood from weather, microbes, and insects.<sup>24</sup> In metal treatment, chromium trioxide provides a durable, corrosion-resistant oxide finish.<sup>25</sup> Other end uses for chromium trioxide include as a catalyst in manufacturing, or as an oxidizing agent in glass and ceramic manufacturing, plastic plating, and laboratory use.<sup>26</sup>

## **B. Arguments of the Parties**

Petitioner argues that the Commission should define a single domestic like product that is coextensive with the scope, consisting of all chromium trioxide in all forms.<sup>27</sup> Petitioner argues that all forms of chromium trioxide share similar physical characteristics, including identical chemical composition and Chemical Abstract Services (“CAS”) registry number.<sup>28</sup> It states that all chromium trioxide can be used in one of two primary applications—to preserve wood, or as surface treatment for metals.<sup>29</sup> ACC asserts that all chromium trioxide is sold through two channels of distribution: to end users or distributors.<sup>30</sup> It argues that both

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<sup>22</sup> CR/PR at 1.9-1.10, 1.14, & Table 1.3.

<sup>23</sup> CR/PR at 1.10.

<sup>24</sup> CR/PR at 1.10-1.11. In the United States, CCA is primarily applied to outdoor utility poles and marine pilings. CCA has been banned for use in residential products. CR/PR at 1.11; Conference Tr. at 26 (McAdams).

<sup>25</sup> CR/PR at 1.11.

<sup>26</sup> CR/PR at 1.10.

<sup>27</sup> Petitioner Br. at 2.

<sup>28</sup> Petitioner Br. at 3.

<sup>29</sup> Petitioner Br. at 4. Petitioner acknowledges some secondary applications for chromium trioxide, such as a catalyst in manufacturing, an oxidizing agent in glass and ceramic manufacture, and laboratory use. *Id.*

<sup>30</sup> Petitioner Br. at 5.

customers and producers perceive chromium trioxide as a “commodity product” that is “interchangeable regardless of manufacturer,” and for which competing products have only “slight” differences.<sup>31</sup> Petitioner asserts that all domestic chromium trioxide is made at its single facility and with a single process.<sup>32</sup> Finally, it argues that prices for chromium trioxide exist along a continuum based on form and application needs.<sup>33</sup>

No respondent party addressed the definition of domestic like product.

### **C. Analysis**

Based on the record of these preliminary phase investigations, we define a single domestic like product consisting of chromium trioxide, coextensive with the scope in these investigations.<sup>34</sup>

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<sup>31</sup> Petitioner Br. at 5.

<sup>32</sup> Petitioner Br. at 5-6; Conference Tr. at 38-39 (McAdams).

<sup>33</sup> Petitioner Br. at 6. Petitioner also compared chromium trioxide in dry and liquid form under the Commission’s semi-finished products analysis. Petition at 18-20; Petitioner Br. at 6-8. Petitioner argues that the only use for dry chromium trioxide is to be turned into solution, that there is no independent market for dry chromium trioxide, that the only physical difference is that the solution includes water, that solution demands higher prices due to processing and volatility in travel but is still priced largely on the weight of dry chromium trioxide contained in the solution, and that processing requires little more than a vessel to mix the dry form and water as well as safety equipment for handling. *Id.* At the staff conference, counsel for both ACC and respondents clarified that the concept of dry chromium trioxide as “semi-finished” does not reflect the views of the market and that the dry form is considered a “complete product.” Conference Tr. at 10 (DiPietro) & 118 (Brophy). In light of all parties’ agreement on this issue and the absence of contrary information on the record, we rely on the traditional like product factors in defining the domestic like product in these investigations.

<sup>34</sup> See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”).

The Commission generally considers a number of factors including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

*Physical Characteristics and Uses.* All chromium trioxide shares the same basic physical characteristics and end uses. It has a chemical formula of CrO<sub>3</sub> and is primarily sold in solid form, including flake, crystal, or grain.<sup>35</sup> Although chromium trioxide must be dissolved in solution before most applications, it becomes volatile and hazardous in liquid form.<sup>36</sup> As a result, it is often transported in dry form.<sup>37</sup> Chromium trioxide has two primary uses—in wood preservation and metal finishing.<sup>38</sup> Although metal finishing has higher purity requirements than wood preservation, Petitioner indicates that all domestically produced chromium trioxide is suitable for either application.<sup>39</sup>

*Manufacturing Facilities, Production Processes and Employees.* All chromium trioxide production follows the same underlying chemical reactions.<sup>40</sup> In the United States, all chromium trioxide is made at a single facility, on common production lines, and with the same employees.<sup>41</sup>

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<sup>35</sup> Petition at 4; CR/PR at 1.9.

<sup>36</sup> CR/PR at 1.10.

<sup>37</sup> Petition at 4-5.

<sup>38</sup> CR/PR at 1.10-1.11; Petition at 6. Petitioner estimates that two-thirds of the U.S. market for chromium trioxide is for wood treatments, and one-third for metal finishing. Conference Tr. at 41-42 (McAdams).

<sup>39</sup> Conference Tr. at 39 (McAdams) (stating that ACC “make essentially the same exact product for both {wood and metal applications} from the same manufacturing lines and fill the same containers for both industries.”).

<sup>40</sup> CR/PR at 1.11-1.13.

<sup>41</sup> Conference Tr. at 39 (McAdams) (stating that for “... our production process, we make essentially the same exact product for both and supply from the same manufacturing lines and fill the containers for both {metal and wood} industries”).

*Channels of Distribution.* A substantial majority of U.S. commercial shipments by domestic producers went to end users during the POI, with the remainder to distributors.<sup>42</sup> Distributors in turn sell chromium trioxide to end users.<sup>43</sup>

*Interchangeability.* Petitioner describes chromium trioxide as a “commodity product,” and indicates that all the chromium trioxide it produces can be used in any application, whether wood preservation or metal finishing.<sup>44</sup> To the degree that chromium trioxide exists in different dry forms and shapes, Petitioner indicates these traits only affect the time needed to dissolve in water but does not otherwise affect the properties of or suitable applications for chromium trioxide.<sup>45</sup>

*Producer and Customer Perceptions.* Petitioner asserts that both producers and customers view chromium trioxide as a “commodity product” with any differences in purity levels between manufacturers being “slight” and not affecting end uses.<sup>46</sup> To the degree some end users have preferences for certain purity levels, particularly in metal applications, Petitioner argues that chromium trioxide from any source could nonetheless be used given an attractive enough price.<sup>47</sup>

*Price.* ACC has indicated that prices for chromium trioxide exist along a continuum depending on form, with dry form being cheaper and liquid form somewhat more expensive due to the additional processing and volatility in transport.<sup>48</sup> The pricing data on the record of

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<sup>42</sup> CR/PR at Table 2.2.

<sup>43</sup> Petitioner Br. at 5.

<sup>44</sup> Petitioner Br at 4-5; Conference Tr. at 39 (McAdams).

<sup>45</sup> Petitioner Br. 4.

<sup>46</sup> Petitioner Br. at 5; Petition at 17-18.

<sup>47</sup> Petition at 17-18.

<sup>48</sup> Petitioner Br. at 6.

the preliminary phase of the investigations support this characterization of a continuum, in that chromium trioxide in dry form was sold in similar prices ranges during the POI, and chromium trioxide in solution generally commanded slightly higher prices, \*\*\*.<sup>49</sup>

*Conclusion.* The record indicates that all domestically produced chromium trioxide within the scope shares the same basic physical characteristics and uses and can be used interchangeably, is sold through the same channels of distribution, and is produced in the same production facility, with the same manufacturing processes, and with the same employees. It also indicates that all chromium trioxide can be used interchangeably and is perceived by both producers and customers as a commodity product with little variation. Finally, available pricing data indicate that chromium trioxide is sold in a continuum of prices with slight variations between dry and solution forms.

In light of the record evidence for these preliminary determinations, we define a single domestic like product consisting of all chromium trioxide, coextensive with Commerce's scope.

#### **IV. Domestic Industry**

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."<sup>50</sup> In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all

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<sup>49</sup> CR/PR at Table 5.12. U.S. producer prices for chromium trioxide in dry form, pricing products 1-3, showed significant overlap. Prices for product 1 ranged between \$\*\*\* and \$\*\*\* per pound CDW, prices were between \$\*\*\* and \$\*\*\* per pound CDW for product 2, and prices were between \$\*\*\* and \$\*\*\* per pound CDW for product 3. Prices for product 4, which was in liquid form, ranged between \$\*\*\* and \$\*\*\* per pound CDW. *Id.*

<sup>50</sup> 19 U.S.C. § 1677(4)(A).

domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

Petitioner argues that the Commission should define the domestic industry as ACC, the only U.S. producer of chromium trioxide.<sup>51</sup> No respondent party addressed the definition of domestic industry.<sup>52</sup> These investigations do not raise any related parties or other domestic industry issues.<sup>53</sup>

Therefore, consistent with our definition of the domestic like product, we define the domestic industry to include the single producer of chromium trioxide, ACC.

## **V. Negligible Imports**

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.<sup>54</sup>

The Commission's questionnaire data indicate that from September 2024 through August 2025, the 12-month period preceding the filing of the petitions, subject imports from India accounted for \*\*\* percent of total imports, and subject imports from Turkey accounted

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<sup>51</sup> Petitioner Br. at 8.

<sup>52</sup> At the staff conference, respondents referenced ACC's affiliation with entities in Turkey and Kazakhstan, but ACC clarified that these affiliates were firms that mine chromite (FeCr<sub>2</sub>O<sub>4</sub>) and are not producers or exporters of chromium trioxide. Conference Tr. at 73-74 (Roche); *see also* Conference Tr. at 40 (Nagarajan) (stating ACC "is entirely owned and operating in the United States. There is no affiliation with any other Turkish producer of chromic acid.").

<sup>53</sup> ACC did not import or purchase subject merchandise during the POI. CR/PR at 3.11. It is also not affiliated with any U.S. importer or exporter of subject merchandise. CR/PR at 3.1 & Table 3.2.

<sup>54</sup> 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

for \*\*\* percent of total imports.<sup>55</sup> As subject imports from both countries clearly exceed negligible levels, we find that imports of chromium trioxide from India and Turkey are not negligible.

## VI. Cumulation

For purposes of evaluating the volume and effects for a determination of reasonable indication of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.<sup>56</sup>

While no single factor is necessarily determinative, and the list of factors is not exhaustive, these factors are intended to provide the Commission with a framework for determining

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<sup>55</sup> CR/PR at Table 4.4.

<sup>56</sup> See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-80 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

whether the subject imports compete with each other and with the domestic like product.<sup>57</sup>

Only a “reasonable overlap” of competition is required.<sup>58</sup>

**A. Arguments of the Parties**

*Petitioners’ Arguments:* Petitioner argues that the Commission should cumulate imports from India and Turkey for its analysis of reasonable indication of present material injury, contending that imports from each subject source compete with each other and the domestic like product in the U.S. market.<sup>59</sup> Petitioner contends that there is a high degree of fungibility in chromium trioxide from all sources, as it is all sold in the same forms and competes for the same customers and applications.<sup>60</sup> ACC further argues that chromium trioxide from all sources is sold through the same channels of distribution and in the same geographic areas of the U.S. market, and was present in substantial volumes throughout the POI.<sup>61</sup>

*Respondents’ Arguments:* Respondents do not address cumulation for present material injury.

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<sup>57</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>58</sup> The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, vol. I at 848 (1994) (citing *Fundicao Tupy*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

<sup>59</sup> Petitioner Br. at 10.

<sup>60</sup> Petitioner Br. at 10-11.

<sup>61</sup> Petitioner Br. at 11-12.

## B. Analysis and Conclusion

We consider subject imports from India and Turkey on a cumulated basis, because the statutory criteria for cumulation are satisfied. As an initial matter, Petitioner filed the antidumping petitions with respect to India and Turkey and the countervailing duty petition with respect to India on the same day, September 29, 2025. The record in the preliminary phase of these investigations also supports finding a reasonable overlap of competition between subject imports from India and Turkey, and between subject imports from each source and the domestic like product, for the reasons discussed below.

*Fungibility.* ACC reported that chromium trioxide from any source can \*\*\* be used interchangeably.<sup>62</sup> U.S. importers of subject merchandise reported that chromium trioxide from the United States and India was always or sometimes interchangeable, while a majority reported that chromium trioxide from the United States and Turkey was always interchangeable.<sup>63</sup> A majority of importers also reported that chromium trioxide from India and Turkey was always interchangeable.<sup>64</sup> The U.S. producer and U.S. importers reported that the vast majority of their chromium trioxide shipments was shipped in dry form to customers, with smaller percentages being shipped and then converted to liquid by the shipper at the customer site, or being shipped and delivered as liquid.<sup>65</sup>

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<sup>62</sup> CR/PR at 2.14.

<sup>63</sup> CR/PR at Table 2.8.

<sup>64</sup> CR/PR at Table 2.8.

<sup>65</sup> CR/PR at Table 4.5. The U.S. producer reported that \*\*\* percent of its product was shipped and delivered dry, \*\*\* percent was converted to liquid at customers, and \*\*\* percent was shipped and delivered liquid. U.S. importers from India reported that \*\*\* percent of its product was shipped and delivered dry, \*\*\* was converted to liquid at customer, and \*\*\* percent was shipped and delivered liquid. U.S. importers from Turkey reported that \*\*\* percent of their products as shipped and delivered (Continued...)

*Channels of Distribution.* A substantial majority of U.S. commercial shipments of chromium trioxide from all sources was sold to end users during the POI, with the remainder sold to distributors.<sup>66</sup>

*Geographic Overlap.* U.S. producers and importers of subject merchandise reported selling to virtually all regions of the contiguous United States during the POI.<sup>67</sup>

*Simultaneous Presence in Market.* The domestic like product was present in the U.S. market throughout the 45-month POI,<sup>68</sup> while subject imports from India were present in the U.S. market for 29 months, and subject imports from Turkey for \*\*\* months.<sup>69</sup>

*Conclusion.* The record of the preliminary phase of the investigations indicates that subject imports from India and Turkey are generally fungible with the domestic like product and each other. The record also indicates that imports from each of the subject countries and the domestic like product were generally sold in overlapping channels of distribution and geographic markets and were simultaneously present in the U.S. market during the POI. Because the record indicates a reasonable overlap of competition between and among subject imports from India, Turkey, and the domestic like product, we cumulate subject imports from

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dry, \*\*\* percent was converted to liquid at customer, and \*\*\* percent was shipped and delivered liquid. *Id.*

<sup>66</sup> CR/PR at Table 2.1. Over the course of the POI, the percentage of shipments to end users ranged between \*\*\* percent and \*\*\* percent for the domestic like product, \*\*\* for subject imports from India, and ranged between \*\*\* percent and \*\*\* percent for subject imports from Turkey. *Id.*

<sup>67</sup> CR/PR at Table 2.2. The only region in which one source did not report selling is the \*\*\* where no \*\*\* reported selling the product. Firms from each source reported selling in all other regions of the contiguous United States. *Id.*

<sup>68</sup> CR/PR at Tables 5.4 to 5.7; *see also* Petition at 26.

<sup>69</sup> CR/PR at Table 4.7.

these sources for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

## **VII. Reasonable Indication of Material Injury by Reason of Subject Imports**

### **A. Legal Standard**

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>70</sup> In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.<sup>71</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>72</sup> In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.<sup>73</sup> No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>74</sup>

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with

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<sup>70</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>71</sup> 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

<sup>72</sup> 19 U.S.C. § 1677(7)(A).

<sup>73</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>74</sup> 19 U.S.C. § 1677(7)(C)(iii).

material injury by reason of” unfairly traded imports,<sup>75</sup> it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.<sup>76</sup> In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.<sup>77</sup>

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby

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<sup>75</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>76</sup> *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

<sup>77</sup> The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred “by reason of” the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.<sup>78</sup> In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.<sup>79</sup> Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.<sup>80</sup> It is

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<sup>78</sup> SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

<sup>79</sup> SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

<sup>80</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

clear that the existence of injury caused by other factors does not compel a negative determination.<sup>81</sup>

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”<sup>82</sup> The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”<sup>83</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>84</sup>

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

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<sup>81</sup> See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

<sup>82</sup> *Mittal Steel*, 542 F.3d at 876 & 78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

<sup>83</sup> *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

<sup>84</sup> *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); see also *Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.<sup>85</sup> Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.<sup>86</sup>

## **B. Conditions of Competition and the Business Cycle**

The following conditions of competition inform our analysis of whether there is a reasonable indication of material injury by reason of subject imports.<sup>87</sup>

### **1. Demand Conditions**

U.S. demand for chromium trioxide is driven by demand for U.S.-produced downstream products in two primary markets, wood preservation and metal surface treatment.<sup>88</sup> At the staff conference, both Petitioner and respondents indicated wood applications account for two-thirds of the market for chromium trioxide, and that purchasers Koppers and Arxada<sup>89</sup> are the largest purchasers within this market.<sup>90</sup> Both Petitioner and respondent parties have indicated that demand remained constant for wood preservation over the POI, while it declined for metal

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<sup>85</sup> We provide in our discussion below a full analysis of other factors that may have caused any material injury experienced by the domestic industry.

<sup>86</sup> *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

<sup>87</sup> In the petitions, ACC reported that it internally consumed \*\*\* percent of its annual chromium trioxide production. Petition at 6. However, it subsequently clarified that \*\*\*. CR/PR at 1.3 n.6. Regardless, the threshold criterion for the captive production provision that “domestic producers internally transfer significant production of the domestic like product” is not met in these investigations. Accordingly, we do not apply the captive production provision. See 19 U.S.C. § 1677(7)(C)(iii).

<sup>88</sup> CR/PR at 2.6. Petitioner has acknowledged other “secondary” uses for chromium trioxide, including in catalyst manufacturing, as an oxidizing agent in glass and ceramic manufacturing, plastic plating, and laboratory use. CR/PR at 1.10; Petition at 6. Such uses, however, appear account for a limited portion of the market.

<sup>89</sup> \*\*\*. EDIS Doc. 865351.

<sup>90</sup> Representatives for Petitioner and respondents indicated that metal applications account for the remaining one-third of the market. Conference Tr. at 41-42 (McAdams) & 115 (Gulersen & DiPietro). Representatives for Koppers indicated that it and Arxada are the largest producers of CCA in the United States. Conference Tr. at 67 (Schoen).

surface treatment.<sup>91</sup> Chromium trioxide accounts for a large share of the cost for intermediate products, such as CCA (48 percent) or wood preservative (75 percent), but a smaller share of the cost for ultimate end-use products, such as 20 percent of the cost of CCA-treated wood.<sup>92</sup>

U.S. producer ACC reported that demand had \*\*\* over the POI, and it attributed this trend to reasons such as \*\*\*.<sup>93</sup> U.S. importers reported mixed demand trends, with half of responding firms reporting that demand had fluctuated downward or steadily decreased and half reporting that demand had not changed.<sup>94</sup>

Apparent U.S. consumption declined \*\*\* percent between 2022 and 2024, initially remaining largely constant in 2022 (\*\*\* pounds contained dry weight (“CDW”)) and 2023 (\*\*\* pounds CDW) and then declining to \*\*\* pounds CDW in 2024.<sup>95</sup> Between January-September 2024 and 2025 (“interim 2024” and “interim 2025”), apparent consumption increased \*\*\* percent, from \*\*\* pounds CDW in interim 2024 to \*\*\* pounds CDW in interim 2025.<sup>96</sup>

The U.S. market for chromium trioxide is heavily concentrated in two major purchasers, \*\*\* and \*\*\*, which both purchase for the wood treatment end use; together they accounted for over \*\*\* percent of apparent U.S. consumption over the POI.<sup>97</sup> \*\*\* began purchasing the domestic like product in 2024, but at a lower volume than the increase in its purchases of

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<sup>91</sup> CR/PR at 2.6; Petition at 28; Kobitex Br. at 3. Petitioner argues that demand decreased in metal applications because of ecological and health concerns, while Kobitex argues it is because of the development of alternatives to chromium trioxide. Petitioner Br. at 13-14; Kobitex Br. at 3.

<sup>92</sup> CR/PR at 2.6.

<sup>93</sup> CR/PR at 2.6-2.7.

<sup>94</sup> CR/PR at 2.7.

<sup>95</sup> CR/PR at Tables 4.8 & C-1.

<sup>96</sup> CR/PR at Tables 4.8 & C-1.

<sup>97</sup> *Calculated from* CR/PR at Tables 5.23, C.1.

subject imports from 2022-2024.<sup>98</sup> Pursuant to its purchasing agreement with ACC, \*\*\* only purchased chromium trioxide from ACC during the POI.<sup>99</sup>

## 2. Supply Conditions

The domestic industry consisted of Petitioner ACC, which operates a single production facility at Castle Hayne, North Carolina.<sup>100</sup> Petitioner reported that it has sufficient capacity to supply the entire U.S. market.<sup>101</sup> Based on available information, the U.S. producer has the ability to respond to changes in demand with large changes in the quantity of domestically produced chromium trioxide to the U.S. market, although the U.S. producer does report that it experienced capacity \*\*\*.<sup>102</sup>

The domestic industry was the largest source of supply for chromium trioxide to the U.S. market throughout the POI, but this share by quantity declined between 2022 and 2024, from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024.<sup>103</sup> Its share by quantity increased from \*\*\* percent in interim 2024 to \*\*\* percent in interim 2025.<sup>104</sup>

ACC's practical capacity for chromium trioxide remained \*\*\* over the POI, at \*\*\* pounds CDW between 2022 and 2024, and at \*\*\* pounds CDW in interim 2024 and interim 2025.<sup>105</sup> Its production of chromium trioxide declined between 2022 and 2024, from \*\*\*

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<sup>98</sup> CR/PR at Table 5.21.

<sup>99</sup> CR/PR at Table 5.23, Petitioner Br. at Exhibit 1, Answer to Staff Question 15.

<sup>100</sup> CR/PR at 3.1 & Table 3.1.

<sup>101</sup> Petitioner Br. at 14. In 2024, Petitioner reported practical capacity of \*\*\* pounds CDW, as compared to total apparent U.S. consumption of \*\*\* pounds CDW in 2024. CR/PR at Table C-1.

<sup>102</sup> CR/PR at 2.3 & Table 3.6.

<sup>103</sup> CR/PR at Tables 4.8 & C.1.

<sup>104</sup> CR/PR at Tables 4.8 & C.1.

<sup>105</sup> CR/PR at Tables 3.5 & C.1.

pounds CDW in 2022 to \*\*\* pounds CDW in 2023 and \*\*\* pounds CDW in 2024.<sup>106</sup> Its production was slightly higher in interim 2025 (\*\*\* pounds CDW) than in interim 2024 (\*\*\* pounds CDW).<sup>107</sup> ACC's practical capacity utilization for chromium trioxide accordingly declined between 2022 and 2024, from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024, and was slightly higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).<sup>108</sup>

Cumulated subject imports were the second largest source of supply for chromium trioxide over the POI, with their share increasing. Their share of apparent U.S. consumption by quantity increased from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024.<sup>109</sup> Their share was also higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).<sup>110</sup> Thus, cumulated subject imports' market share increased by \*\*\* percentage points from 2022 to 2024, and was \*\*\* percentage points higher in interim 2025 than in interim 2024.<sup>111</sup>

Nonsubject imports were the smallest source of supply to the U.S. market throughout the POI. Their share of apparent U.S. consumption by quantity declined between 2022 and 2024; it was \*\*\* percent in 2022, \*\*\* percent in 2023, and \*\*\* percent in 2024.<sup>112</sup> This decline accelerated at the end of the POI, with their share declining from \*\*\* percent in interim 2024

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<sup>106</sup> CR/PR at Tables 3.5 & C.1.

<sup>107</sup> CR/PR at Tables 3.5 & C.1.

<sup>108</sup> CR/PR at Tables 3.5 & C.1.

<sup>109</sup> CR/PR at Tables 3.5 & C.1.

<sup>110</sup> CR/PR at Tables 3.5 & C.1.

<sup>111</sup> CR/PR at Table C.1.

<sup>112</sup> CR/PR at Tables 3.5 & C.1.

to \*\*\* percent in interim 2025.<sup>113</sup> The largest sources of nonsubject imports during the POI were Kazakhstan and South Africa.<sup>114</sup>

ACC reported experiencing supply constraints early in the POI, specifically that \*\*\*.<sup>115</sup> U.S. importer and purchaser \*\*\* also reported that ACC refused to provide price quotes or sell to it during the POI, while ACC countered that \*\*\*.<sup>116</sup>

### 3. Substitutability and Other Conditions

As noted above, all chromium trioxide consists of the same molecular formula, is shipped in the vast majority of cases in dry form, and is used by purchasers in the form of a solution in water.<sup>117</sup> No party has suggested that the particular dry form – flake, crystalline, or granular – has an effect on the purchaser’s ultimate use of the product in liquid form. Furthermore, a majority of market participants reported that subject imports were \*\*\* interchangeable with each other and the domestic like product and no firm reported that subject imports are never interchangeable with each other or the domestic like product.<sup>118</sup> As discussed below, while some market participants argued that there are differences in available packaging (*e.g.*, drums/cans, rail, sparger truck, or sparger tote) for chromium trioxide between

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<sup>113</sup> CR/PR at Tables 3.5 & C.1.

<sup>114</sup> CR/PR at 2.5.

<sup>115</sup> CR/PR at 2.5.

<sup>116</sup> CR/PR at 2.5 & 5.31; Petitioner Br. at Resp. to Staff Questions, 13. In any final phase of these investigations, we intend to further examine any supply constraints.

<sup>117</sup> Conference Tr. at 38 (Nagarajan); CR/PR at 2.14-2.15 & Table 4.5.

<sup>118</sup> CR/PR at Table 2.8. ACC reported that subject imports India and Turkey are \*\*\* interchangeable with both each other and the domestic like product. *Id.* While some importers indicated that subject imports were not interchangeable with the domestic like product, a majority of importers reported that subject imports from Turkey are always interchangeable with the domestic like product while an equal amount of importers (two) reported that subject imports from India are always interchangeable with the domestic like product as those that reported that they were sometimes interchangeable. *Id.*

subject imports and domestic product, ACC reported shipping the domestic like product in \*\*\* as well as rail, \*\*\* during the POI.<sup>119</sup> Based on the record in the preliminary phase of these investigations, we find that there is at least a moderately high degree of substitutability between domestically produced chromium trioxide and subject imports.<sup>120</sup>

The record in the preliminary phase of these investigations indicates that price is an important factor in purchasing decisions, among other factors such as quality, reliability/supply, and packaging. While U.S. purchasers responding to the lost sales and revenue survey most frequently identified quality (two firms) and packaging (two firms) as the most important purchasing factor, three responding firms also identified price as the third most important factor.<sup>121</sup> ACC reported that there are \*\*\* significant differences other than price between chromium trioxide from any source.<sup>122</sup> The majority of responding U.S. importers reported that there are always or frequently significant differences other than price between chromium trioxide from different sources.<sup>123</sup> Non-price factors cited by U.S. importers included \*\*\* and quality.<sup>124</sup>

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<sup>119</sup> Koppers Br. at 3-4; Kobitex Br. at 9.

<sup>120</sup> In any final phase, we intend to examine further the degree to which subject imports and domestic products are substitutable and whether the substitutability has changed over the POI.

<sup>121</sup> CR/PR at Table 2.7. Three responding firms identified reliability/supply as the second most important purchasing factor. *Id.*

<sup>122</sup> CR/PR at 2.15.

<sup>123</sup> CR/PR at Table 2.9. For comparisons between chromium trioxide from the U.S. and India, two of four responding importing firms reported there were always significant differences other than price, and one reported that there were frequently such differences. For comparisons between chromium trioxide from the U.S. and Turkey, three of five responding importing firms reported that there were always significant differences other than price. *Id.*

<sup>124</sup> CR/PR at 2.15.

Subject imports were generally shipped in drums/cans, while the domestic like product was shipped via \*\*\* as well as \*\*\*. Specifically, some firms indicated that certain packaging types (e.g., drums/cans, sparger truck, sparger totes, and rail) require the purchaser to have specific handling infrastructure, often due to the volatility and carcinogenic nature of chromium trioxide.<sup>125</sup> As noted above, two of three responding purchasers ranked packaging as the most important purchasing factor.<sup>126</sup> The vast majority of—if not all—shipments of subject imports utilized \*\*\*.<sup>127</sup> While ACC reported that much of its U.S. shipments utilized \*\*\*, it also reported shipping some chromium trioxide in drums/cans and that it was willing and able to utilize drums/cans throughout the POI.<sup>128</sup>

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<sup>125</sup> Conference Tr. at 70-71 (Roche); Kobitex Br. at 2-3 & 9-10; Koppers Br. at 2-3 & Appendix at 2-5; Lost Sales and Lost Revenue Survey, EDIS Doc. 865351, at 7 (purchaser \*\*\* as the most important purchasing factor).

<sup>126</sup> CR/PR at Table 2.7.

<sup>127</sup> ACC reported \*\*\*. CR/PR at 5.5 n.8. Pricing data, which accounted for \*\*\* percent of the U.S. producer's U.S. shipments of chromium trioxide, \*\*\* percent of U.S. shipments of subject imports from India, and \*\*\* of U.S. shipments of subject imports from Turkey in 2024, respectively show shipments of chromium trioxide flake shipped in cans from each of ACC and subject imports from India and Turkey, but only shipments from ACC for chromium trioxide liquid shipped in totes. CR/PR at Tables 5.4 (pricing data for product 1, showing shipments from each of ACC, subject imports from India, and subject imports from Turkey), 5.5 (pricing data for product 2, showing shipments of ACC and subject imports from Turkey), 5.6 (pricing data for product 3, showing shipments of ACC and subject imports from Turkey), 5.7 (pricing data for product 4, showing only shipments for domestic producer), 5.8 (purchase cost data for product 1 showing shipments of subject imports from India and Turkey), 5.9 (purchase cost data for product 2 showing shipments of subject imports from Turkey), and 5.10 (purchase cost data for product 3 showing shipments of subject imports from India and Turkey). Pricing product 1 is chromium trioxide flake packaged in metal cans ranging from 240kg to 250kg, pricing product 2 is chromium trioxide flake packaged in 25kg cans, and pricing product 3 is chromium trioxide flake packaged in 50kg cans, and pricing product 4 is chromic acid liquid 40 percent in HDPE IBC totes ranging between 1,000kgs and 1,600kgs. CR/PR at 5.5.

<sup>128</sup> CR/PR at 5.5 n.8; CR/PR Tables 5.4-5.10; Petitioner Br. at Exhibit 1, Answer to Question 25 (citing Exhibit 17).

ACC sells its chromium trioxide primarily \*\*\*, reporting that \*\*\* percent of its commercial shipments were \*\*\* with lead times averaging \*\*\*.<sup>129</sup> The remaining commercial shipments came from \*\*\*, with lead times averaging \*\*\* days.<sup>130</sup> U.S. importers of subject merchandise reported that \*\*\* percent of commercial shipments were from foreign inventories, with lead times averaging \*\*\* days.<sup>131</sup> Of remaining U.S. importer commercial shipments, \*\*\* percent were produced to order with lead times averaging \*\*\* days, and \*\*\* percent were from U.S. inventories with lead times averaging \*\*\* days.<sup>132</sup>

ACC reported selling \*\*\* percent of its commercial shipments in 2024 under \*\*\*, with the remaining \*\*\* percent under \*\*\*.<sup>133</sup> U.S. importers reported selling \*\*\* percent of their commercial shipments in 2024 under annual contracts, \*\*\* percent under short-term contracts, and \*\*\* percent under spot sales.<sup>134</sup>

Substitutes for chromium trioxide are generally limited. ACC identified various substitutes, including \*\*\* for metal applications, and \*\*\* for wood applications.<sup>135</sup> ACC indicates, however, that these substitutes are generally \*\*\* and characterizes them as not

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<sup>129</sup> CR/PR at 2.14.

<sup>130</sup> CR/PR at 2.14.

<sup>131</sup> CR/PR at 2.14.

<sup>132</sup> CR/PR at 2.14.

<sup>133</sup> CR/PR at Table 5.3. ACC reported its offers \*\*\* discounts in its contracts. *Id.* at 5.4.

<sup>134</sup> CR/PR at Table 5.3. A plurality of importers reported that they offer no discounts, while two reported that they offered quantity discounts. *Id.* at 5.4.

<sup>135</sup> CR/PR at 2.12.

“commercially viable” alternatives to chromium trioxide.<sup>136</sup> No importer questionnaire response identified alternatives to chromium trioxide.<sup>137</sup>

The primary raw materials used to produce chromium trioxide are chemical grade chromite ore and soda ash.<sup>138</sup> The Producer Price Index for Chemicals and Allied Products: Alkalies and Chlorine, including Natural Sodium Carbonate and Sulfate increased over 2022 and until January 2023, and irregularly decreased thereafter; the index was 4.2 percent lower in November 2025 than in January 2022.<sup>139</sup> Raw materials were the largest component of the domestic producer’s cost of goods sold (“COGS”) over the POI.<sup>140</sup> As a ratio to net sales, the domestic industry’s raw materials costs declined slightly between 2022 and 2024, from \*\*\* percent in 2022 to \*\*\* percent in 2024, and the ratio was higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).<sup>141</sup>

Effective April 5, 2025, chromium trioxide from India was subject to an additional 10 percent *ad valorem* duty under the International Emergency Economic Powers Act (50 U.S.C. § 1701 *et seq.*) (“IEEPA”), which was increased to a 25 percent *ad valorem* duty under IEEPA

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<sup>136</sup> CR/PR at 2.12.

<sup>137</sup> CR/PR at 2.12. Kobitex argued that alternatives to chromium trioxide for metal applications have reduced demand for chromium trioxide in this market over time, but it did not identify any such alternatives. Kobitex Br. at 3; Conference Tr. at 92 (Gulersen).

<sup>138</sup> CR/PR at 5.1. Nearly 100 percent of chromite ore used to produce chromium chemicals in the United States is from South Africa. Leading global producers of chromite ore are India, Kazakhstan, South Africa, and Turkey. The United States is one of the leading global producers of sodium carbonate. *Id.*

<sup>139</sup> CR/PR at Figure 5.1 & Table 5.1.

<sup>140</sup> CR/PR at 5.1 & Table 6.1. Raw materials’ share of the cost of goods sold declined from \*\*\* percent in 2022 to \*\*\* percent in 2024; it was higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent). *Id.*

<sup>141</sup> CR/PR at Table 6.1.

effective August 7, 2025.<sup>142</sup> Effective August 27, 2025, chromium trioxide from India was subject to an additional 25 percent *ad valorem* duty under IEEPA, resulting in a total 50 percent *ad valorem* rate for chromium trioxide from India.<sup>143</sup>

Effective April 5, 2025, chromium trioxide from Turkey was subject to an additional 10 percent *ad valorem* duty under IEEPA, which was increased to a 15 percent *ad valorem* duty effective August 7, 2025.<sup>144</sup>

### **C. Volume of the Subject Imports**

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”<sup>145</sup>

The volume of cumulated subject imports by quantity increased \*\*\* percent between 2022 and 2024, from \*\*\* pounds CDW in 2022 to \*\*\* pounds CDW in 2023 and \*\*\* pounds CDW in 2024.<sup>146</sup> It was \*\*\* percent higher in interim 2025 (\*\*\* pounds CDW) than in interim 2024 (\*\*\* pounds CDW).<sup>147</sup>

Cumulated subject imports’ market share increased from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024, for an overall gain of \*\*\* percentage points.<sup>148</sup> Their

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<sup>142</sup> CR/PR at 1.7-1.8.

<sup>143</sup> CR/PR at 1.7-1.8 & Table 1.2.

<sup>144</sup> CR/PR at 1.7-1.8.

<sup>145</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>146</sup> CR/PR at Tables 4.2 & 4.3.

<sup>147</sup> CR/PR at Tables 4.2 & 4.3.

<sup>148</sup> CR/PR at Tables 4.8 & C.1.

market share was \*\*\* percentage points higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).<sup>149</sup>

Based on the record in the preliminary phase of these investigations, we find that the volume of subject imports and the increase in that volume are significant, both in absolute terms and relative to consumption in the United States.

#### **D. Price Effects of the Subject Imports**

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of subject imports, the Commission shall consider whether –

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.<sup>150</sup>

As discussed in section VII.B.3 above, we find that there is at least a moderately high degree of substitutability between subject imports and the domestic like product and that price is an important factor in purchasing decisions for chromium trioxide, among other important factors.

We have examined several sources of data in our underselling analysis, including pricing, purchase cost, and lost sales data. With respect to pricing data, the Commission collected quarterly quantity and f.o.b. pricing data from U.S. producers and importers on their sales of four chromium trioxide products shipped to unrelated U.S. customers during the January 2022

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<sup>149</sup> CR/PR at Tables 4.8 & C.1.

<sup>150</sup> 19 U.S.C. § 1677(7)(C)(ii).

to September 2025 period.<sup>151</sup> ACC and three importers provided usable pricing data for the requested products, although not all firms reported pricing data for all products and for all quarters.<sup>152</sup> Pricing data reported by these firms accounted for \*\*\* percent of the U.S. producer's U.S. shipments of chromium trioxide, \*\*\* percent of U.S. shipments of subject imports from India, and \*\*\* of U.S. shipments of subject imports from Turkey in 2024, respectively.<sup>153</sup> <sup>154</sup> With respect to purchase cost data, two importers (\*\*\*) reported purchase cost data for products 1, 2, and 3, which accounted for \*\*\* percent of imports from India and \*\*\* percent of imports from Turkey.<sup>155</sup>

The pricing data indicate that cumulated subject imports undersold domestically produced chromium trioxide in 51 of 56 available quarterly comparisons, at margins ranging from \*\*\* to \*\*\* percent and averaging \*\*\* percent, and in quantities totaling \*\*\* pounds

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<sup>151</sup> CR/PR at 5.5. The pricing product are:

**Product 1.**— chromium trioxide flake, chemical formula CrO<sub>3</sub> packaged in large metal cans (ranging between 240 kg and 250 kg per can);

**Product 2.**— chromium trioxide flake, chemical formula CrO<sub>3</sub> packaged in 25 kg metal cans;

**Product 3.**— chromium trioxide flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans; and

**Product 4.**— chromic acid liquid 40%, chemical formula H<sub>2</sub>CrO<sub>4</sub> in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs). *Id.*

<sup>152</sup> CR/PR at 5.5. No importers reported pricing data for product 4.

<sup>153</sup> CR/PR at 5.5.

<sup>154</sup> Koppers characterizes the pricing data in these preliminary determinations as “suspect” because they omit the largest type of shipment for ACC, which it claims is \*\*\*. Koppers Br. at 5 & 8. Nonetheless, the pricing data for products 1, 2, and 3 capture the \*\*\* of U.S. shipments of subject imports over the POI, include significant shipments of domestic product, and the quantity of domestic product and subject imports in these products together accounted for \*\*\* percent of total apparent U.S. consumption over the POI. *Calculated from* CR/PR at Tables 5.12 & C.1. If any party believes that further pricing products will allow additional pricing comparisons for head-to-head competition between domestically produced chromium trioxide and subject imports, it should propose such pricing products in its comments on the draft questionnaires for any final phase of these investigations. See 19 C.F.R. § 207.20(b).

<sup>155</sup> CR/PR at 5.14.

CDW.<sup>156</sup> Subject imports oversold the domestic product in the remaining five quarterly comparisons, at margins ranging from \*\*\* to \*\*\* percent and averaging \*\*\* percent, and in quantities totaling \*\*\* pounds CDW.<sup>157</sup> We note that the few quarters in which overselling occurred were in the beginning of the POI, whereas underselling was universal after the beginning of 2023.<sup>158</sup> Subject imports thus undersold the domestic product in the vast majority of quarterly comparisons and in volumes that accounted for \*\*\* percent of the total reported subject import volumes .<sup>159</sup>

The import purchase cost data show that the landed duty-paid (“LDP”) costs for subject imports were below the sales price for the domestic like product for products 1, 2, and 3 in 21 of 23 available quarterly comparisons, involving \*\*\* pounds CDW, at price-cost differentials ranging from \*\*\* to \*\*\* percent, and averaging \*\*\* percent.<sup>160</sup> LDP costs were higher for subject imports in the remaining two quarterly comparisons involving \*\*\* pounds CDW, at price-cost differentials ranging from \*\*\* to \*\*\* percent, and averaging \*\*\* percent.<sup>161</sup> Thus, subject imports reported in the purchase cost data had a lower LDP cost than the sales price of

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<sup>156</sup> CR/PR at Table 5.15.

<sup>157</sup> CR/PR at Table 5.15.

<sup>158</sup> Quarters in which subject imports oversold the domestic product were \*\*\* for product 1, and \*\*\* for product 3. CR/PR at Tables 5.4 & 5.6.

<sup>159</sup> *Calculated from* CR/PR at Table 5.15.

<sup>160</sup> CR/PR at Table 5.18. Two importers, \*\*\*, reported usable import purchase cost data, with these quantities accounting for a reported \*\*\* percent of subject imports from India and \*\*\* percent of imports from Turkey in 2024. \*\*\* have acknowledged that their reported data double counted product between pricing data and import purchase cost data. See EDIS Doc. 866528. We intend to clarify the proper allocation of these data in any final phase of these investigations.

<sup>161</sup> CR/PR at Table 5.18.

the domestic like product in the vast majority of quarterly comparisons, accounting for \*\*\* percent of the total reported subject imports in these comparisons.<sup>162</sup>

We recognize that the import purchase cost data may not reflect the total cost of importing and therefore requested that U.S. importers provide additional information regarding the costs and benefits of directly importing chromium trioxide. Both U.S. importers reported incurring additional costs beyond the LDP costs associated with importing chromium trioxide, with additional costs estimates ranging from \*\*\* to \*\*\* percent.<sup>163</sup> These importers attributed additional costs to freight from the foreign supplier (including \*\*\*), higher working capital, and storage and broker fees.<sup>164</sup> \*\*\* reported that it compares costs of importing to the costs of purchasing from a U.S. producer in determining whether to import subject merchandise, while \*\*\* reported that it did not.<sup>165</sup> In reporting benefits from importing subject merchandise themselves instead of purchasing from U.S. producers or importers, \*\*\* indicated that it allowed obtaining the product in the desired form while \*\*\* reported that ACC does not have ample supply.<sup>166</sup>

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<sup>162</sup> *Calculated from* CR/PR at Tables 5.18.

<sup>163</sup> CR/PR at 5.14.

<sup>164</sup> CR/PR at 5.14; Lost Sales Lost Revenue Survey, EDIS Doc. 865353. We note that \*\*\* included \*\*\* freight from the foreign supplier in its calculation of additional costs, including \*\*\*. *Id.* \*\*\* would not normally be reflected in pricing data given that such prices are reported on a f.o.b. basis. In any final phase of these investigations, we intend to continue to examine additional costs associated with firms' reported purchase cost data.

<sup>165</sup> CR/PR at 5.14. When asked to describe additional costs of importing compared to purchasing from a U.S. importer or producer, \*\*\* reported that inland transaction costs were cheaper for purchases than for imports, while \*\*\* reported it would have no additional costs if it were able to purchase from ACC. *Id.*

<sup>166</sup> CR/PR at 5.14-5.15.

We have also considered U.S. purchasers' responses to the Commission's lost sales/lost revenue survey.<sup>167</sup> Two of four responding purchasers reported that they had purchased subject imports instead of the domestically produced chromium trioxide since 2022, and one of these reported that subject imports was lower priced than the domestic product.<sup>168</sup> While neither of these firms reported that price was the primary reason for subject import purchases, we note that one, \*\*\*, purchased far more subject imports than domestic product over the POI; subject imports as a share of total purchases increased by more than domestic products' share.<sup>169</sup> No responding purchaser reported that the U.S. producer had reduced prices in order to compete with lower priced subject imports.<sup>170</sup>

Petitioner argues that the Commission should further consider the head-to-head competition between purchasers \*\*\*, which it asserts represent virtually the entire market for chromium trioxide for wood applications.<sup>171</sup> Petitioner argues that an increase in sales by one firm results in a decrease for the other, that the purchase of subject imports gives \*\*\*, and that this interplay ultimately affect these firms' primary sources of chromium trioxide, as \*\*\* buys primarily subject imports and \*\*\* buys only domestic product.<sup>172</sup> The data in these preliminary

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<sup>167</sup> The Commission contacted five purchasers for which ACC identified lost sales or revenue, and received responses from four of these firms. CR/PR at 5.31. Responding purchasers reported purchasing and importing \*\*\* pounds CDW of chromium trioxide over the POI, which accounted for \*\*\* percent of reported apparent U.S. consumption over the POI. *Calculated from* CR/PR at Tables 5.21 & C.1.

<sup>168</sup> CR/PR at 5.31.

<sup>169</sup> CR/PR at 5.31 & Table 5.21. \*\*\* reported purchasing \*\*\* pounds CDW from ACC during the POI versus \*\*\* pounds CDW from subject sources over the POI; its share of domestic purchases increased by \*\*\* percentage points, while its share of subject imports and purchases increased by \*\*\* percentage points over the POI. *Id.*

<sup>170</sup> CR/PR at 5.31.

<sup>171</sup> Petitioner Br. at 29-30. Koppers agrees that \*\*\* account for virtually all purchases of chromium trioxide for wood applications. Koppers Br. at 2-3 & 9-10.

<sup>172</sup> Petitioner Br. at 29-30.

investigations indicate that \*\*\* purchased only from the domestic industry during the POI, and that these purchases declined irregularly and by \*\*\* percent overall between 2022 and 2024, from \*\*\* pounds CDW in 2022 to \*\*\* pounds CDW in 2024.<sup>173</sup> Over this same time period, \*\*\* purchases across sources increased by \*\*\* percent, from \*\*\* pounds CDW in 2022 to \*\*\* pounds in 2024, and the \*\*\* of these purchases were from subject imports.<sup>174</sup> In any final phase of these investigations, we intend to continue to examine the trends in and reasons for purchasing decisions of chromium trioxide by CCA producers and the extent to which the pricing of chromium trioxide advantages particular downstream market participants.<sup>175</sup>

As summarized above, the pricing data show that subject imports overwhelmingly undersold the domestic like product for products 1, 2, and 3 during the POI of these preliminary determinations, and universally for these products after the first quarter of 2023. The purchase cost data also show that subject imports were priced lower than the domestic like product. Given these data, as well as the at least moderately high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that subject imports undersold the domestic like product to a significant degree during the POI. This underselling contributed to cumulated subject imports capturing sales and market share from the domestic industry over the 2022 to 2024 period. During this

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<sup>173</sup> Lost Sales and Lost Revenue Survey, EDIS Doc. 865351, at 4.

<sup>174</sup> Lost Sales and Lost Revenue Survey, EDIS Doc. 865353 at 4.

<sup>175</sup> Petitioner also disputes the assertion by purchaser \*\*\* that \*\*\*. CR/PR at Table 5.23. In the petitions, ACC provided a statement that \*\*\*. Petition, Exh. GEN-1 (affidavit of \*\*\*); CR/PR at 5.31. As noted above, we intend to further examine in any final phase of these investigations the extent to which there were supply constraints during POI.

period, subject imports gained \*\*\* percentage points of market share while the domestic industry lost \*\*\* percentage points of market share.

We have also considered whether subject imports depressed or suppressed prices to a significant degree. Between the first quarter of 2022 and the third quarter of 2025, prices for domestically produced product 1 increased irregularly by \*\*\* percent, prices for domestically produced product 2 increased irregularly by \*\*\* percent, prices for domestically produced product 3 increased irregularly by \*\*\* percent, and prices for domestically produced product 4 increased irregularly by \*\*\* percent.<sup>176</sup> Prices for pricing product 1 imported from India declined irregularly \*\*\* percent over the POI, and purchase cost data for this product from India also declined irregularly \*\*\* percent over the period, but pricing and purchase cost data otherwise do not show declining prices or costs for subject imports.<sup>177</sup> No responding purchasers reported that U.S. producers lowered their prices in order to compete with lower-priced subject imports during the POI.<sup>178</sup>

Apparent U.S. consumption declined \*\*\* percent between 2022 and 2024, but increased \*\*\* percent between interim 2024 and interim 2025, while questionnaire responses indicated that demand either stayed the same or declined steadily or irregularly over the

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<sup>176</sup> CR/PR at Table 5.12. Petitioner also claims that it was forced to offer lower prices to \*\*\* to win its business in 2024 and 2025, and that \*\*\* access to and purchases of subject imports were why it demanded lower prices from ACC. Petitioner Br. at 28-29. The purchaser did not confirm this allegation.

<sup>177</sup> CR/PR at Table 5.12. Pricing data for subject imports from Turkey show that prices increased \*\*\* percent for product 1, \*\*\* percent for product 2, and \*\*\* percent for product 3. Purchase cost data for subject imports from Turkey show that importer costs were \*\*\* for products 1 and 2, and purchase cost data for subject imports from India show that importer costs were \*\*\* for product 3. *Id.*

<sup>178</sup> CR/PR at 5.31.

POI.<sup>179</sup> ACC's average ratio of COGS to net sales increased over the POI, from \*\*\* percent in 2022 to \*\*\* percent in 2023 and to \*\*\* percent in 2024.<sup>180</sup> The ratio was slightly lower in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).<sup>181</sup> The increase in the COGS-to-net-sales ratio from 2022 to 2024 was primarily driven by increases in direct labor and other factory costs, both of which increased on a per unit basis and as a share of COGS over this time.<sup>182</sup> ACC's net sales AUV increased between 2022 and 2024, from \$\*\*\* per pound CDW in 2022 to \$\*\*\* per pound CDW in 2023 and \$\*\*\* per pound CDW in 2024.<sup>183</sup> ACC's net sales AUV was lower in interim 2025 (\$\*\*\* per pound CDW) than in interim 2024 (\$\*\*\* per pound CDW).<sup>184</sup>

In sum, based on the record in the preliminary phase of these investigations, we conclude that subject imports significantly undersold the domestic like product. This underselling allowed subject imports to take significant market share from the domestic

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<sup>179</sup> CR/PR at 2.6-2.7 & Tables 4.8 and C.1. In any final phase of these investigations, we will further examine how any declines in apparent U.S. consumption and demand may impact the ability of parties to raise prices further in the U.S. market.

<sup>180</sup> CR/PR at Table 6.1.

<sup>181</sup> CR/PR at Table 6.1.

<sup>182</sup> CR/PR at Table 6.1. Between 2022 and 2024, direct labor on a per unit basis increased from \$\*\*\* per pound CDW in 2022 to \$\*\*\* per pound CDW in 2024 and increased \*\*\* percentage points as a share of COGS, and other factory costs on a per unit basis increased from \$\*\*\* per pound CDW in 2022 to \$\*\*\* per pound CDW in 2024 and increased \*\*\* percentage points as a share of COGS. Raw material costs on a per unit basis increased from \$\*\*\* per pound CDW in 2022 to \$\*\*\* per pound CDW in 2024 but declined \*\*\* percentage points as a share of COGS between 2022 and 2024. *Id.*

<sup>183</sup> CR/PR at Table 6.1.

<sup>184</sup> CR/PR at Table 6.1.

industry.<sup>185</sup> Accordingly, we find a reasonable indication that subject imports had significant price effects.

#### **E. Impact of the Subject Imports<sup>186</sup>**

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, “shall evaluate all relevant economic factors which have a bearing on the state of the industry.” These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>187</sup>

According to trade and financial indicators, the domestic industry’s performance declined during most of the POI, driven by declines in its production, shipments, market share, and revenues, to the point where it \*\*\* at the end of the POI.

The domestic industry’s trade indicators generally declined during the POI. As discussed above in section VII.B.2, the domestic industry’s practical capacity remained constant even as

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<sup>185</sup> As discussed in section VII.E below, we find that the record of these preliminary determinations does not indicate that differences in packaging types attenuated competition between the domestic industry and subject imports over the POI such that subject imports did not have significant price effects.

<sup>186</sup> Commerce initiated the antidumping duty investigation on chromium trioxide from India based on an estimated dumping margin of 14.44 percent *ad valorem*, and of 40.88 percent *ad valorem* for chromium trioxide from Turkey. *Chromium Trioxide From India and the Republic of Türkiye: Initiation of Less-Than-Fair-Value Investigations*, 91 Fed. Reg. 234 (Jan. 5, 2026).

<sup>187</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

its production declined between 2022 and 2024.<sup>188</sup> As a result, capacity utilization declined throughout 2022 and 2024, but was slightly higher between interim periods.<sup>189</sup>

The domestic producer's U.S. shipments by quantity declined between 2022 and 2024, but increased between the interim periods.<sup>190</sup> These declining shipments were greater than declines in apparent U.S. consumption, which resulted in the domestic producer's market share declining between 2022 and 2024, with a small increase between interim 2024 and interim 2025.<sup>191</sup>

The domestic producer's end-of-period inventories increased irregularly over the POI.<sup>192</sup> As a ratio to total shipments, end-of-period inventories also increased irregularly during the period.<sup>193</sup>

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<sup>188</sup> CR/PR at Tables 3.5 & C.1. ACC's practical capacity was \*\*\* pounds CDW from 2022 to 2024, and \*\*\* pounds CDW in interim 2024 and interim 2025. Its production declined from \*\*\* pounds CDW in 2022 to \*\*\* pounds CDW in 2023 and \*\*\* pounds CDW in 2024; its production was slightly higher in interim 2025 (\*\*\* pounds CDW) than in interim 2024 (\*\*\* pounds CDW). *Id.*

<sup>189</sup> CR/PR at Tables 3.5 & C.1. ACC's capacity utilization declined from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024. It increased from \*\*\* percent in interim 2024 to \*\*\* percent in interim 2025. *Id.*

<sup>190</sup> In pounds CDW, ACC's U.S. shipments declined from \*\*\* in 2022 to \*\*\* in 2023 and \*\*\* in 2024; U.S. shipments of \*\*\* in interim 2025 were higher than the \*\*\* in interim 2024. When combined with its reported export shipments, which were smaller than U.S. shipments and declined over the POI, ACC's total shipments followed these same trends. As reported in pounds CDW, total shipments declined from \*\*\* in 2022 to \*\*\* in 2023 and \*\*\* in 2024; they were slightly higher in interim 2025 (\*\*\* ) than in interim 2024 (\*\*\*). CR/PR at Tables 3.8 & C.1.

<sup>191</sup> ACC's share of apparent U.S. consumption by quantity declined from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; its share was \*\*\* percent in interim 2024 and \*\*\* percent in interim 2025. CR/PR at Tables 4.8 & C.1.

<sup>192</sup> ACC's reported end-of-period inventories declined from \*\*\* pound CDW in 2022 to \*\*\* pounds CDW in 2023 and then increased to \*\*\* pounds CDW in 2024, a level that was \*\*\* percent higher than in 2022. End-of-period of \*\*\* pounds CDW in interim 2025 were \*\*\* percent greater than the \*\*\* pounds CDW in interim 2024. CR/PR at Tables 3.9 & C.1.

<sup>193</sup> ACC's ratio of end-of-period inventories to total shipments initially declined from \*\*\* percent in 2022 to \*\*\* percent in 2023, and then increased to \*\*\* percent in 2024, an increase of \*\*\* percentage points. The ratio of \*\*\* percent in interim 2025 was higher than the ratio of \*\*\* percent in interim 2024. CR/PR at Tables 3.9 & C.1.

Employment indicators were mixed over the POI. ACC's number of production-related workers ("PRWs"),<sup>194</sup> total hours worked,<sup>195</sup> and wages paid<sup>196</sup> increased between 2022 and 2024 and was largely steady between the interim periods. However, hours worked per PRW were essentially steady throughout the POI,<sup>197</sup> which resulted in declines in productivity<sup>198</sup> and an increase in unit labor costs.<sup>199</sup> ACC reported that \*\*\*.<sup>200</sup>

ACC's financial indicators declined over the POI to the point where it \*\*\* in 2024 and interim 2025. Its net sales revenue,<sup>201</sup> gross profit,<sup>202</sup> operating income,<sup>203</sup> and net income<sup>204</sup> all declined between 2022 and 2024, and (with the exception of gross profits) further declined

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<sup>194</sup> The number of PRWs employed by ACC increased from \*\*\* in 2022 to \*\*\* in 2023 and declined slightly to \*\*\* in 2024, before returning to \*\*\* in interim 2025. CR/PR at Tables 3.10 & C.1.

<sup>195</sup> ACC reported that total hours worked increased from \*\*\* in 2022 to \*\*\* in 2023, and then declined slightly to \*\*\* in 2024. Total hours worked were constant between the interim periods at \*\*\*. CR/PR at Tables 3.10 & C.1.

<sup>196</sup> ACC reported that wages paid increased from \$\*\*\* in 2022 to \$\*\*\* in 2023 and 2024. Wages paid were slightly lower in interim 2025 (\$\*\*\*) than in interim 2024 (\$\*\*\*). CR/PR at Tables 3.10 & C.1.

<sup>197</sup> ACC reported that hours worked per PRW increased slightly from \*\*\* hours in 2022 to \*\*\* hours in 2023, and decreased slightly to \*\*\* hours in 2024. They were \*\*\* hours in both interim 2024 and interim 2025. CR/PR at Tables 3.10 & C.1.

<sup>198</sup> ACC's reported productivity per worker declined from \*\*\* pounds CDW per hour in 2022 to \*\*\* pounds CDW per hour in 2023 and \*\*\* pounds CDW per hour in 2024. Productivity increased slightly from \*\*\* pounds CDW per hour in interim 2024 to \*\*\* pounds CDW per hour in interim 2025. CR/PR at Tables 3.10 & C.1.

<sup>199</sup> On a dollars per pound CDW basis, ACC's unit labor costs increased from \$\*\*\* in 2022 to \$\*\*\* in 2023 and \$\*\*\* in 2024. They declined slightly from \$\*\*\* in interim 2024 to \$\*\*\* in interim 2025. CR/PR at Tables 3.10 & C.1.

<sup>200</sup> CR/PR at Table 3.4; Petitioner Br. at 37.

<sup>201</sup> ACC's net sales revenue declined from \*\*\* in 2022 to \*\*\* in 2023 and \*\*\* in 2024. Net sales revenue was steady between the interim periods, at \*\*\* in interim 2024 and \*\*\* in interim 2025. CR/PR at Tables 6.1 & C.1.

<sup>202</sup> ACC's gross profits declined from \$\*\*\* in 2022 to \$\*\*\* in 2023 and \$\*\*\* in 2024; gross profit was steady at \$\*\*\* in both interim 2024 and interim 2025. CR/PR at Tables 6.1 & C.1.

<sup>203</sup> ACC's operating income declined from \*\*\* in 2022 to \*\*\* in 2023 and \*\*\* in 2024. Its operating income was \*\*\* in interim 2024 and \*\*\* in interim 2025. CR/PR at Tables 6.1 & C.1.

<sup>204</sup> ACC's net income declined from \*\*\* in 2022 to \*\*\* in 2023 and \*\*\* in 2024. Its net income was \*\*\* in interim 2024 and \*\*\* in interim 2025. CR/PR at Tables 6.1 & C.1.

between interim periods. Its ratio of operating income to net sales as well as its net income to net sales declined throughout the period, and were \*\*\*.<sup>205</sup>

ACC's capital expenditures declined between 2022 and 2023 and remained steady thereafter.<sup>206</sup> Total net assets fluctuated but increased overall during the POI.<sup>207</sup> Finally, ACC reported negative effects on growth and investment due to subject imports.<sup>208</sup>

We have found that subject imports have at least moderately high substitutability with the domestic like product and entered the U.S. market in significant and increasing volumes, absolutely and relative to consumption, during the POI. We have also found that price is an important purchasing factor for purchases of chromium trioxide, that subject import underselling was significant during the period, and that this underselling contributed to subject imports taking significant market share from the domestic industry. Consequently, we conclude that subject imports are a cause of the domestic industry's declining trade and financial measures, including financial \*\*\* in 2024 and interim 2025. Accordingly, we find that

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<sup>205</sup> ACC's ratio of operating income to net sales declined from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024, and in the interim periods the ratio was \*\*\* percent in interim 2024 and \*\*\* percent in interim 2025. Its ratio of net income to net sales declined from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024, and the ratio was \*\*\* percent in interim 2024 and \*\*\* percent in interim 2025. CR/PR at Tables 6.1 & C.1.

<sup>206</sup> ACC's capital expenditures declined from \$\*\*\* in 2022 to \$\*\*\* in 2023, and were \$\*\*\* in 2024; capital expenditures were \$\*\*\* in interim 2024 and interim 2025. Between 2022 and 2024, these expenditures declined \*\*\* percent. CR/PR at Tables 6.5 & C.1. ACC reported that these expenditures \*\*\*. CR/PR at Table 6.6.

ACC did not report any research and development expenditures, indicating that \*\*\*. CR/PR at Tables 6.5 & 6.6.

<sup>207</sup> ACC's total assets initially increased from \*\*\* in 2022 to \*\*\* in 2023, and then declined to \*\*\* in 2024, a level that was \*\*\* percent higher than in 2022. CR/PR at Tables 6.5 & C.1. ACC reported that changes to its total assets between 2022 and 2023 were \*\*\*. CR/PR at Table 6.6.

<sup>208</sup> CR/PR at Table 6.7.

there is a reasonable indication that subject imports had a significant impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. We have considered respondents' argument that differences in packaging limit competition between subject imports and the domestic producer, particularly their allegation that ACC cannot or would not supply chromium trioxide in drums.<sup>209</sup> Although purchasers reported that packaging is an important purchasing factor, the pricing product data for chromium trioxide flake shipped in "cans" (products 1, 2, and 3) indicate that ACC shipped such product in direct competition with subject imports.<sup>210</sup> Although Koppers alleges that ACC refused to supply it chromium trioxide in drums during the POI, and provided supporting correspondence, ACC provided correspondence indicating that \*\*\*.<sup>211</sup> Indeed, \*\*\*.<sup>212</sup> In any final phase of these investigations, we intend to continue to investigate how packaging may have affected purchases of chromium trioxide.

Koppers argues that ACC's declining shipments were the result of \*\*\*, and that this decline could not be attributed to subject imports because \*\*\*.<sup>213</sup> As discussed above, however, both ACC and respondents agree that the market for chromium trioxide in wood applications is largely divided between Koppers and Arxada, and Petitioner has argued that \*\*\*

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<sup>209</sup> Korbitex Br. at 4; Koppers Br. at 5 & 11.

<sup>210</sup> CR/PR at Tables 2.7 & 5.12.

<sup>211</sup> Koppers Br. at 3 & Exhs. 2.2 & 3; Petitioner Br. at Exhs. 15-20.

<sup>212</sup> \*\*\*; Petitioner Br. at Exh. 1, Answer to Commission Question 19. Additionally, Koppers indicated that it had invested money in its facilities over 2023 to 2024 to accept shipments of chromium trioxide in sparger trucks from ACC. Koppers Br. at 3-4 & 6.

<sup>213</sup> Koppers Br. at 11.

are the result of \*\*\*.<sup>214</sup> As noted above, we intend to continue examining the trends of and reasons for purchasing decisions of chromium trioxide by CCA producers in any final phase of these investigations. Regardless of any declining sales to \*\*\*, we have found above that \*\*\* purchases of the domestic like product in 2024 were significantly less in volume than the increase in its purchases of subject imports from 2022-2024. Moreover, as discussed above, the record does not indicate that differences in packaging types were such that they attenuate price-based competition between domestic product and subject imports. Therefore, but for the presence of low-priced subject imports, we find based on the limited record in these preliminary phase investigations that \*\*\* would have purchased more of the domestic like product in 2024 and the domestic industry would have had a higher market share.

Koppers and Kobitex further argue that ACC's decline in revenues was a result of declines in export shipments and apparent U.S. consumption rather than subject import competition.<sup>215</sup> Yet even aside from the declines in ACC's export shipments and apparent U.S. consumption, ACC lost U.S. market share to cumulated subject imports between 2022 and 2024, indicating that it could have expected greater U.S. shipments but for subject import competition.<sup>216</sup> Accordingly, we find that ACC's declines in export shipments and the declines in apparent U.S. consumption do not fully explain the injury we have attributed to subject imports.

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<sup>214</sup> Petitioner Br. at 29-30; Koppers Br. at 2-3 & 9-10.

<sup>215</sup> Koppers Br. at 4-5 & 10; Kobitex Br. at 6-7.

<sup>216</sup> CR/PR at Tables 4. & C.1. As noted above, cumulated subject imports' U.S. market share by quantity increased \*\*\* percent between 2022 and 2024, while ACC's market share by quantity declined \*\*\* percent. *Id.*

As discussed in section VII.B.2 above, nonsubject imports were the smallest source of chromium trioxide in the U.S. market throughout the POI, and their share declined.<sup>217</sup> This decline was especially pronounced at the end of the POI, with shares by quantity of \*\*\* percent in interim 2024 versus \*\*\* percent in interim 2025, while the share of cumulated subject imports increased to its highest level of the POI.<sup>218</sup> Consequently, nonsubject imports do not explain the injury we have attributed to subject imports.

### **VIII. Conclusion**

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of chromium trioxide from India and Turkey that are allegedly sold in the United States at LTFV and subsidized by the government of India.

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<sup>217</sup> CR/PR at Tables 4.8 & C.1.

<sup>218</sup> CR/PR at Tables 4.8 & C.1.



# Part 1: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by American Chrome & Chemicals, Inc. (“ACC”), Canonsburg, Pennsylvania, on September 29, 2025, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of chromium trioxide<sup>1</sup> from India and Turkey and alleged to be subsidized by the Government of India. Table 1.1 presents information relating to the background of these investigations.<sup>2 3</sup>

**Table 1.1 Chromium trioxide: Information relating to the background and schedule of this proceeding**

Effective date	Action
September 29, 2025	Petitions filed with Commerce and the Commission; institution of the Commission’s investigations (90 FR 47820, October 2, 2025)
November 14, 2025	Revised scheduling of Commission’s investigations (90 FR 52096, November 19, 2025)
December 4, 2025	Commission’s conference
December 12, 2025	Revised scheduling of Commission’s investigations (90 FR 59203, November 18, 2025)
December 29, 2025	Commission’s vote
December 30, 2025	Commission’s determinations
January 6, 2026	Commission’s views

Note: Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised its schedule for this proceeding.

## Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the “Act”) (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission—

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<sup>1</sup> See the section entitled “The subject merchandise” in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

<sup>2</sup> Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> A list of witnesses appearing at the conference is presented in appendix B of this report.

shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that—<sup>4</sup>

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—<sup>5</sup>

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in

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<sup>4</sup> Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

<sup>5</sup> Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

the United States merely because that industry is profitable or because the performance of that industry has recently improved.

## Organization of report

Part 1 of this report presents information on the subject merchandise alleged subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

## Market summary

Chromium trioxide is generally used for wood preservation, metal finishing, and plating. Secondary applications include catalyst manufacturing, use as an oxidizing agent, glass and ceramic manufacturing, plastic plating and laboratory use. Chromium trioxide may also be used in the manufacture of trivalent chrome products (i.e. chromium nitrate, chromium chloride, chromium phosphate, chromium sulfate, and specialty chrome oxide) as well as hexavalent chrome products (i.e. barium chromate). ACC uses a small amount of the chromium trioxide it produces as a precursor in the production of a chromium sulfate product, \*\*\*. However, internal consumption amounts to only about \*\*\* of ACC's chromium trioxide production annually.<sup>6</sup>

Wood finishers use chromium trioxide to produce chromated copper arsenate ("CCA"), which is a wood preservative containing compounds of chromium, copper, and arsenic, in various proportions. It is used to impregnate timber and other wood products, especially those intended for outdoor use, to provide a more attractive finish and in order to protect them from weathering and attack by microbes and insects. On metal, chromium trioxide is a highly effective treatment that provides a more durable, corrosion-resistant oxide finish.<sup>7</sup>

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<sup>6</sup> On p. 6 of its petition, counsel for ACC \*\*\*, however in their submitted producer questionnaire, ACC identified this as \*\*\*.

<sup>7</sup> Petition, p. 6

The sole known U.S. producer of chromium trioxide is ACC, while leading producers of chromium trioxide outside the United States include Vishnu Chemicals Limited of India and Turkiye Sise v e Cam Fabrikalari AS (Şişecam Dis Ticaret A.S) of Turkey. The leading U.S. importers of chromium trioxide from India are Koppers Inc. (“Koppers”) and Plating International Inc (“Plating International”), while the leading importers of chromium trioxide from Turkey are Kobitex Inc (“Kobitex”) and PhibroChem, A Division of Phibro Animal Health Corporation (“Phibro”). Leading importers of product from Nonsubject Countries (primarily Kazakhstan, South Africa and China) include Kobitex, Phibrow and Plating International. U.S. purchasers of chromium trioxide are distributors and end users that manufacture corrosion-resistant coatings for wood preservation and metal finishing and plating; leading purchasers include Arch Wood Protection, Inc. (“Arch Wood”), Tenneco Inc (“Tenneco”), and Koppers.

Apparent U.S. consumption of chromium trioxide totaled approximately \*\*\* pounds (\$\*\*\*) in 2024. Currently, one firm is known to produce chromium trioxide in the United States. U.S. producers’ U.S. shipments of chromium trioxide totaled \*\*\* pounds (\$\*\*\*) in 2024, and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. imports from subject sources totaled \*\*\* pounds (\$\*\*\*) in 2024 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. imports from nonsubject sources totaled \*\*\* pounds (\$\*\*\*) in 2024 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value.

## Summary data and data sources

A summary of data collected in these investigations are presented in appendix C, table C.1. The Commission’s questionnaires collected data for the years 2022 to 2024 and interim periods January through September of 2024 (“interim 2024”) and January through September of 2025 (“interim 2025”). Except as noted, U.S. industry data are based on questionnaire responses of one firm that accounted for all known U.S. production of chromium trioxide during 2024. U.S. imports are based on questionnaire responses of five firms that accounted for an estimated \*\*\* percent of subject U.S. imports and an estimated \*\*\* percent of all U.S. imports of chromium trioxide in 2024.

## **Previous and related investigations**

Chromium trioxide has not been the subject of prior countervailing or antidumping duty investigations in the United States.

## **Nature and extent of alleged subsidies and sales at LTFV**

On November 14, 2025, Commerce issued a memorandum stating that as a result of the cessation of government operations it would be tolling certain deadlines in antidumping duty and countervailing duty proceedings by 47 days.<sup>8</sup> Commerce subsequently issued a second memorandum stating that it would toll its deadlines by a further 21 days.<sup>9</sup> Therefore, Commerce has not yet initiated its corresponding antidumping duty and countervailing duty investigations as of the time of the issuance of this report.

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<sup>8</sup> Commerce Memorandum, “Deadlines Affected by the Shutdown of the Federal Government,” dated November 14, 2025 (First Tolling Memo).

<sup>9</sup> Commerce Memorandum, “Tolling of all Case Deadlines,” dated November 24, 2025 (Second Tolling Memo).

## The subject merchandise

In the current proceeding, Petitioners have requested that Commerce adopt the following scope:<sup>10</sup>

The merchandise subject to these investigations is chromium trioxide (Chemical Abstracts Services (“CAS”) registry number 1333-82-0), regardless of form (dry or solution). Chromium trioxide is an inorganic compound with the molecular formula CrO<sub>3</sub> in dry form.

The product in dry form is generally referred to as chromium trioxide, which is the acidic anhydride of chromic acid. Chromium trioxide in solution form may be referred to as chromic acid. However, the dry form may also be marketed under the name chromic acid.

A non-exhaustive list of other names used for the subject merchandise includes: chromic anhydride, chromic trioxide, chromium (VI) oxide, monochromium trioxide, chromia, chromium (VI) trioxide, trioxochromium, and chromtrioxid. A non-exhaustive list of trade names for the subject merchandise includes: 11910080KROMSAV-ANHIDRID IP, Aktivkohle, imprägniert, Typ PLWK, Chromsaure, and Chroomzuur.

All chromium trioxide is covered by the scope of these petitions irrespective of purity, particle size, or physical form. Chromium trioxide is generally imported in dry form, including in the form of pellets, flakes, powders, or beads, but the scope includes chromium trioxide in solution form.

Chromium trioxide that has been blended with another product or products is included in the scope if the resulting mix contains 90 percent or more of chromium trioxide by total formula weight. If chromium trioxide is imported blended with another product, only the chromium trioxide content of the blend is included within the scope.

Subject merchandise also includes chromium trioxide that has been processed in a third country into a product that otherwise would be within the scope of this investigation, *i.e.*, if any such further processing would not otherwise remove the merchandise from the scope of the investigation it is included in the scope of the investigation. For example, the dry form of the subject merchandise may be imported into a third

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<sup>10</sup> Petition, pp. 1.6 to 1.7. As stated above, Commerce has not yet initiated its corresponding antidumping duty and countervailing duty investigations as of the time of the issuance of this report.

country and then processed into solution before shipment to the United States. Such a solution would be subject to the scope.

## Tariff treatment

Based upon the scope contained in the petition, information available to the Commission indicates that the merchandise subject to these investigations are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 2819.10.0000.<sup>11</sup> The general rate of duty is 3.7 percent ad valorem for HTS subheading 2819.10.00.<sup>12</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

## Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)<sup>13</sup>

Effective August 27, 2025, chromium trioxide originating in India is subject to an additional 25 percent ad valorem duty under IEEPA.<sup>14</sup>

Effective April 5, 2025, chromium trioxide originating in India was subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. Effective April 9, 2025, India was instead assigned an individualized country duty of 26 percent ad valorem. However, effective April 10, 2025, the individualized country duties were suspended and the additional duty rate as part of tariffs initiated in April 2025 under IEEPA for

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<sup>11</sup> The tariff line reads “Chromium trioxide,” but the product is also commonly referred to as chromic acid anhydride or chromium (VI) oxide. WCO notes that Chromium trioxide is wrongly referred to as chromic acid. World Customs Organization (WCO), Harmonized Commodity Description and Coding System: Explanatory Notes, vol. 1, 5<sup>th</sup> edition (2012), p. 28.19

<sup>12</sup> USITC, HTS (2025) Revision 31, Publication 5688, November 2025, p. 28.11.

<sup>13</sup> Multiple tariffs have been enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”). Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to India were initiated in August 2025. Tariffs under IEEPA have been amended over time. We note that the applicable IEEPA tariffs are currently subject to ongoing litigation. *V.O.S. Selections Inc., v. Trump*, No. 15-1812, 2025 WL 2490634 (Fed. Cir. Aug. 29, 2025) (*en banc*) (holding that IEEPA does not authorize these tariffs), *petition for cert. filed* (Sept. 3, 2025) (No. 25-250).

<sup>14</sup> 90 FR 38701, August 11, 2025. See also HTS headings 9903.01.84, 9903.01.85, 9903.01.86, 9903.01.87, 9903.01.88, and 9903.01.89 and U.S. note 2(z) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 31, Publication 5688, November 2025, pp. 99.3.32 to 99.3.33, 99.3.357 to 99.3.358.

chromium trioxide originating in India was returned to 10 percent.<sup>15</sup> Effective August 7, 2025, India was assigned an individualized country duty of 25 percent.<sup>16</sup>

Effective April 5, 2025, chromium trioxide originating in Turkey was subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under the IEEPA.<sup>17</sup> Effective August 7, 2025, Turkey was assigned an individual country rate of 15 percent under IEEPA.<sup>18</sup>

**Table 1.2 Chromium Trioxide: Additional tariffs on imports originating in India and Turkey as of December 11, 2025**

Duty rates in percent ad valorem

<b>Additional tariff</b>	<b>India</b>	<b>Turkey</b>
IEEPA – India specific	25	Not applicable
Tariffs initiated in April 2025 under IEEPA	25	15
<b>Total additional ad valorem rate</b>	<b>50</b>	<b>15</b>

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

Note: Duty rates in the table reflect the duty rates as of the writing of this report. See the text above for historical changes to the additional tariffs.

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<sup>15</sup> Individualized country duties as part of tariffs initiated in April 2025 under IEEPA for all countries other than China were suspended until August 1, 2025. 90 FR 15041, April 7, 2025. 90 FR 15625, April 15, 2025. 90 FR 30823, July 10, 2025. See also HTS headings 9903.01.25 and 9903.01.55 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 31, Publication 5688, November 2025, pp. 99.3.5 to 99.3.25, 99.3.345, 99.3.350.

<sup>16</sup> 90 FR 37963, August 6, 2025. See also HTS headings 9903.02.26 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 31, Publication 5688, November 2025, pp. 99.3.5 to 99.3.25, 99.3.365.

<sup>17</sup> 90 FR 15041, April 7, 2025. See also HTS heading 9903.01.25 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 31, Publication 5688, November 2025, pp. 99.3.5 to 99.3.25, 99.3.345.

<sup>18</sup> 90 FR 37963, August 6, 2025. See also HTS heading 9903.02.64 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2025) Revision 31, Publication 5688, November 2025, pp. 99.3.5 to 99.3.25, 99.3.374.

## The product

### Description and applications

The product subject to these investigations is chromium trioxide ( $\text{CrO}_3$ ),<sup>19</sup> a dark red to purple crystalline solid that is highly soluble in water.<sup>20</sup> When chromium trioxide is dissolved in water or sulfuric acid it yields chromic acid ( $\text{H}_2\text{CrO}_4$ ),<sup>21</sup> often referred to as liquid chromium trioxide in the petition.<sup>22</sup> Chromium trioxide primarily exists in flake, crystalline, or granular forms.<sup>23</sup> Chromium trioxide is a strong oxidizing agent that is a known carcinogenic, mutagenic, and reproductive toxicant.<sup>24</sup> Accordingly, the Environmental Protection Agency (EPA) has strict rules, as outlined in table 1.3, with respect to the handling of chromium trioxide.<sup>25</sup>

**Table 1.3: EPA Rules for the Handling of Chromium Trioxide**

Context	Regulation / Standard	Details
Air (stationary sources)	National Emission Standards for Hazardous Air Pollutants (NESHAP) Maximum Achievable Control Technology (MACT)	Controls at plating and chemical plants (40 CFR 63 Subpart N)
Water (drinking)	Safe Drinking Water Act (SDWA) Maximum Contaminant Level (MCL)	0.1 mg/L total chromium
Water (industrial discharge)	Clean Water Act (CWA) effluent pretreatment	Limits via 40 CFR 413 for pre-1983 electroplaters
Chemical use in cooling systems	Toxic Substances Control Act (TSCA), Part 749	Notification for $\text{CrO}_3$ containing chemicals
Spills/releases	Comprehensive Environmental Response, Compensation, and Liability Act/Emergency Planning and Community Right-to-Know Act (CERCLA/EPCRA)	Reporting thresholds & Toxics Release Inventory (TRI) requirements

Source: Petition, vol. 1, p. 7.

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<sup>19</sup> CAS Common Chemistry, "Chromium trioxide," accessed November 21, 2025, [https://commonchemistry.cas.org/detail?cas\\_rn=1333-82-0](https://commonchemistry.cas.org/detail?cas_rn=1333-82-0).

<sup>20</sup> Chemical abstracts service (CAS) number (no.): 1333-82-0. Deleted or replaced CAS no.'s are: 12324-05-9, 12324-08-2, 1362947-20-3. CAS Common Chemistry, "Chromium trioxide," accessed November 21, 2025, [https://commonchemistry.cas.org/detail?cas\\_rn=1333-82-0](https://commonchemistry.cas.org/detail?cas_rn=1333-82-0); Petition, vol. 1, p. 15.

<sup>21</sup> CAS no. 7738-94-5. CAS Common Chemistry, "Chromic acid ( $\text{H}_2\text{CrO}_4$ )," accessed November 21, 2025, [https://commonchemistry.cas.org/detail?cas\\_rn=7738-94-5](https://commonchemistry.cas.org/detail?cas_rn=7738-94-5).

<sup>22</sup> In industry the solid  $\text{CrO}_3$  is marketed and sold as chromic acid, see e.g., "Chromic Acid Flake." American Chrome & Chemicals (ACC), "Chromic Acid Flake," accessed November 21, 2025, <https://americanchromechemicals.com/ca-flake>; ACC conference testimony, slide 5, p.1 (Hansley); Petition, vol. 1.

<sup>23</sup> CAS Common Chemistry, "Chromium trioxide," accessed November 21, 2025, [https://commonchemistry.cas.org/detail?cas\\_rn=1333-82-0](https://commonchemistry.cas.org/detail?cas_rn=1333-82-0); Petition, vol. 1, p. 15.

<sup>24</sup> Chromium trioxide is dangerous if inhaled. EPA, "Chromium Compounds," September 2016, p. 3, <https://www.epa.gov/sites/default/files/2016-09/documents/chromium-compounds.pdf>; Koppers conference testimony, p. 5 (Roche).

<sup>25</sup> Petition, vol. 1, p. 7.

Chromium trioxide must be dissolved in water or sulfuric acid (i.e., chromic acid) before it can be utilized in the vast majority of applications.<sup>26</sup> However, the chromic acid is volatile and potentially hazardous to transport, requiring adherence to a number of regulations.<sup>27</sup> Downstream applications for dry chromium trioxide include wood preservation, metal finishing, and plating.<sup>28 29</sup> The subject product is also used in catalyst manufacturing, as an oxidizing agent, in glass and ceramic manufacturing, plastic plating, and laboratory use.<sup>30</sup> Chromium trioxide is also a precursor for the production of other chromium-containing compounds, both trivalent chrome products (i.e., chromium nitrate, chromium chloride, chromium phosphate, chromium sulfate, and specialty chrome oxide) as well as hexavalent chrome products (i.e., barium chromate).<sup>31</sup>

There are few end uses for chromium trioxide.<sup>32</sup> Wood finishers use chromium trioxide to produce chromated copper arsenate (“CCA”), which is a wood preservative containing compounds of chromium, copper, and arsenic in various proportions.<sup>33</sup> CCA is used to impregnate timber and other wood products, particularly those intended for outdoor use, to provide a finish that also protects treated products from weather and attack by microbes and

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<sup>26</sup> For end users chromium trioxide must be put into a solution prior to use because the chemical reactions that occur in the production of downstream products require liquid chromic acid. The flake and liquid do not have different characteristics. Petition, vol. 1, p. 4; Conference transcript, pp. 18 (Hansley), 38 (Nagarajan); Respondent Kobitex postconference brief, Attachment A, pp. 1, 2; Petitioner postconference brief, p. 10.

<sup>27</sup> As stated above, chromium trioxide in liquid form (i.e., dissolved in water or sulfuric acid) is the product  $H_2CrO_4$ . The Pipeline and Hazardous Materials Safety Administration within the Department of Transportation currently maintains the table of hazardous materials and special provisions. 49 CFR Part 172 Subpart B, p. 201, <https://www.ecfr.gov/current/title-49/part-172/subpart-B>; Petition, vol. 1, p. 4; Conference transcript, p. 18 (Hansley), pp. 37 to 38 (Nagarajan).

<sup>28</sup> Petition, vol. 1, p. 6.

<sup>29</sup> Petitioner states that in U.S. downstream applications, by volume, approximately two-thirds of chromium trioxide is used for wood treatments and one-third of chromium trioxide is used for metal finishing. Conference transcript, p. 42 (McAdams).

<sup>30</sup> Petition, vol. 1, p. 6.

<sup>31</sup> For example, the petitioner utilizes a small amount of chromium trioxide as a precursor in the production of a chromium sulfate product, \*\*\*. Petition, vol. 1, p. 6; ACC conference testimony, slide 5, p.1 (Hansley).

<sup>32</sup> Petitioner states that to the best of its knowledge, all manufacturers of chromium trioxide ultimately produce the same chemical product with the same end uses. The limited number of downstream uses for chromium trioxide could be in part due to the stringent regulations tied to the manufacturing and use of hexavalent chromium, including chromium trioxide. Petition, vol. 1, pp. 7 and 9.

<sup>33</sup> Petition, vol. 1, p. 6.

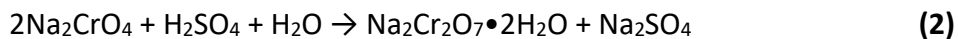
insects.<sup>34</sup> When used in metal treatment, chromium trioxide provides a durable, corrosion-resistant oxide finish.<sup>35 36</sup>

## Manufacturing processes

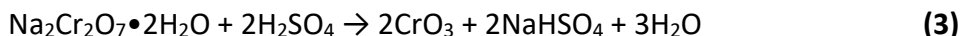
Chromium trioxide is produced from chemical grade chromite ore ( $\text{Cr}_2\text{O}_3$ ).<sup>37</sup> The ore is pulverized and blended with soda ash at a specific rate and introduced into the kilns.<sup>38</sup> In the kilns the blend is roasted at approximately  $1,300^\circ\text{C}$  ( $2,400^\circ\text{F}$ ) to oxidize chromite ore to sodium monochromate ( $\text{Na}_2\text{CrO}_4$ ), equation 1.<sup>39</sup>



The sodium monochromate is then purified through acidification and alkalization.<sup>40</sup> After the impurities are removed, sodium monochromate is acidified to pH 4 to convert sodium monochromate to sodium dichromate dihydrate (SDD,  $\text{Na}_2\text{Cr}_2\text{O}_7 \cdot 2\text{H}_2\text{O}$ ) and sodium sulfate ( $\text{Na}_2\text{SO}_4$ , equation 2). Generally, the sodium sulfate is sent for further purification and crystallization so that it can be sold commercially.<sup>41</sup>



SDD serves as a feedstock for the production of all other chromium compounds. The SDD is further concentrated and sent to the chromium trioxide plant. In a melter, SDD is mixed with sulfuric acid, yielding chromium trioxide ( $\text{CrO}_3$ ) and sodium bisulfate ( $\text{NaHSO}_4$ , equation 3).



Sodium bisulfate is then removed from the molten chromium trioxide and sent back to the dichromate plant for neutralization. The molten chromium trioxide is then dried and flaked using double roll flakers and subsequently packed to be sold. The general production scheme

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<sup>34</sup> Notably, CCA has been banned in the United States for residential products. Conference transcript, p. 26 (McAdams); Petition, vol. 1, p. 6; EPA, "Chromated Arsenicals (CCA)," December 26, 2024, <https://www.epa.gov/ingredients-used-pesticide-products/chromated-arsenicals-cca>.

<sup>35</sup> Petition, vol. 1, p. 6.

<sup>36</sup> Chromium trioxide used in metal finishing applications has to meet more stringent purity requirements than if it were used for wood treatment. Conference transcript, p. 39 (McAdams).

<sup>37</sup> Petitioner sources chrome ore from South Africa. Petition, vol. 1, p. 8; Conference transcript, p. 32 (Hansley).

<sup>38</sup> Petition, vol. 1, p. 8.

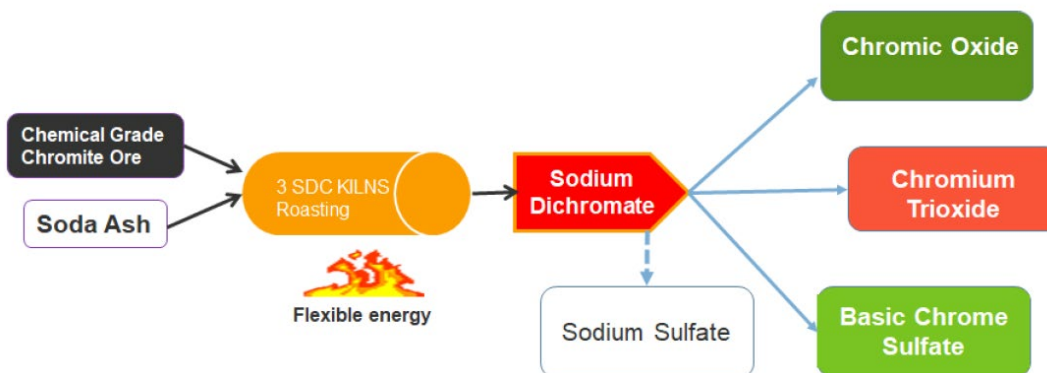
<sup>39</sup> Petition, vol. 1, p. 8.

<sup>40</sup> Examples of impurities present include aluminum and vanadium. Petition, vol. 1, p. 8.

<sup>41</sup> Conference transcript, pp. 30, 32 (Hansley).

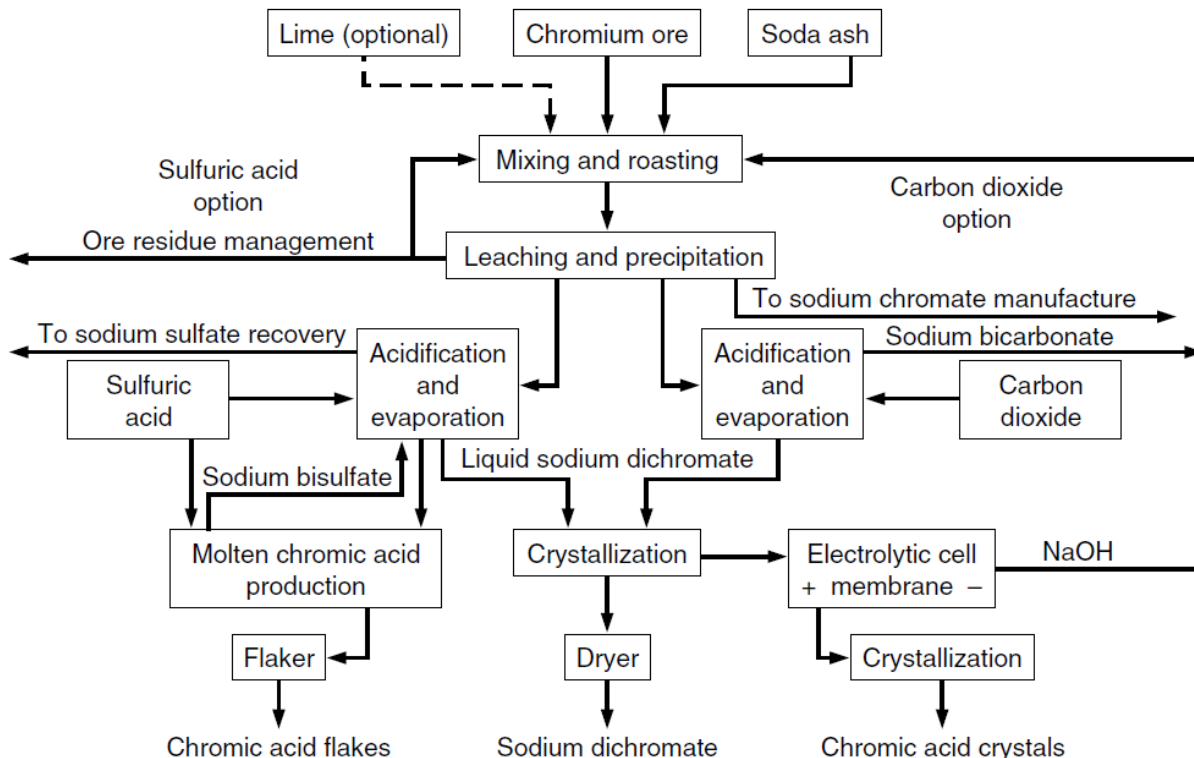
is reflected in figure 1.1 and a more detailed production flow diagram in figure 1.3. The petitioner's production schematic is outlined in figure 1.1.<sup>42</sup>

**Figure 1.1: General Schematic for the Production of Chromium Trioxide from Chemical Grade Chromite Ore**



Source: Petition, vol. 1, p. 9

**Figure 1.2: General Flow Diagram for the Production of Chromic Acid (Chromium Trioxide) Flakes, Chromic Acid (Chromium Trioxide) Crystals and Sodium Dichromate**



Source: Page and Loar, "Chromium Compounds," Kirk-Othmer Encyclopedia of Chemical Technology, vol. 6, January 16, 2004, p. 539, <https://doi.org/10.1002/0471238961.0308181516010705.a01.pub2>.

<sup>42</sup> Production lines that make chromium trioxide are not used to manufacture other products. However, the manufacturing process of chromium trioxide inherently produces other products. Conference transcript, p. 30 (Hansley and Nagarajan).

**Figure 1.3: Detailed Diagram of Production of Chromium Trioxide from Chemical Grade Chromite Ore**

\* \* \* \* \*

Source: Petition, Gen-9.

Individual chromium trioxide producers each operate with their own process designs and proprietary know-how, but the underlying chemical reactions are the same, resulting in product indistinguishable in chemical composition and function once in solution (i.e. chromic acid). The differences in productions are largely centered on equipment configuration and waste recovery steps; therefore, from a customer perspective, once the subject product is in a usable form, there is no meaningful distinction in chromium trioxide sourced from different producers.<sup>43</sup>

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<sup>43</sup> Petition, vol. 1, pp. 9–10.

The petitioner, distributors, and importers most commonly sell chromium trioxide in 25 kg, 240 kg, and 250 kg cans/drums.<sup>44</sup> The petitioner also sells chromium trioxide in sparger<sup>45</sup> totes (1 dry mt/truckload), sparger trucks (15 dry mt/truckload), and sparger rail cars (75 dry mt/railcar), into which water may be added directly.<sup>46</sup> The customer returns the sparger container to the petitioner once it has been emptied.<sup>47</sup> Other types of containers that may be used for chromium trioxide are dry hopper style totes<sup>48</sup> and high density polyethylene (HDPE) dry intermediate bulk container (IBC) totes.<sup>49</sup> Similar to the sparger containers, customers can add water directly to the HDPE IBC tote.<sup>50</sup> Most customers purchase chromium trioxide and subsequently dissolve chromium trioxide in water, yielding chromic acid, at their own facilities following their own safety procedures.<sup>51</sup> Even though chromic acid (also referred to as chromium trioxide in liquid form) is volatile and potentially hazardous to transport it is sold

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<sup>44</sup> Petition, vol. 1, p. 5; Petitioner postconference brief, exhibit 1, 20.

<sup>45</sup> Sparger is a term used by the petitioner to refer to containers designed by the petitioner. The petitioner does not have rights to these container designs and containers can be used by other parties, including competitors. “Sparger” is a misnomer; it typically means that air is pumped into the bottom of the container through tubes that help with the solutioning. The petitioner’s original containers had this design, but their current containers no longer use this method. Currently, all the petitioner’s containers use a rotating mixer, rather than pumped air, to assist the solutioning after the water is added. However, the term has become standard in the industry and has never been changed. Petition, vol. 1, p. 5.

<sup>46</sup> Not all customers can easily receive product by truck or rail. Koppers conference testimony, pp. 3 to 4 (Roche); Conference Transcript, p. 69 (Roche); Petition, vol. 1, p. 5; Petitioner postconference brief, exhibit 1, 20

<sup>47</sup> Petition, vol. 1, p. 5.

<sup>48</sup> Dry hopper totes hold approximately 1,000 kg, and the customer opens a bottom vane that allows the dry flakes to pour out of the tote. Petition, vol. 1, p. 5.

<sup>49</sup> The dry IBC tote is an HDPE IBC tote with chromium trioxide loaded into it. The customer adds water and mixes. Unlike sparger totes, the IBC tote does not have a built-in mixer or way to capture displaced dust. Petition, vol. 1, p. 5.

<sup>50</sup> Petition, vol. 1, p. 5.

<sup>51</sup> However, there are some customers that purchase solution (i.e., chromic acid) for safety and convenience. The conversion of chromium trioxide to chromic acid is a dusty process and dry dust is an extreme hazard with low OSHA personal exposure limits. Therefore, workers are required to have significant amounts of PPE when preparing chromic acid from chromium trioxide. Sparger totes, trucks, and railcars all have systems to contain dust and eliminate dust exposure. While the liquid form (chromic acid) is also hazardous, it is contained in a shipping container, so personnel are not exposed to any dust or liquid if handled properly. Petition, vol. 1, pp. 7–8; OSHA, “Hexavalent Chromium,” 2009, <https://www.osha.gov/sites/default/files/publications/OSHA-3373-hexavalent-chromium.pdf>.

domestically.<sup>52</sup> Liquid chromic acid is sold in HDPE IBC totes and HDPE drums (270 liquid kg to 1,500 liquid kg per tote/drum or tanker trucks.<sup>53</sup>

## Domestic like product issues

The Commission’s decision regarding the appropriate domestic product(s) that are “like” the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price.

The petitioner proposes a single domestic like product consisting of chromium trioxide products that are coextensive with the scope of the investigations.<sup>54</sup> U.S. producers and importers were asked to compare in-scope chromium trioxide to chromic acid on the basis of the factors described above. Summary information regarding these responses is presented in table 1.4 below.

**Table 1.4 Chromium trioxide: Count of firms’ responses regarding semi-finished product analysis comparing chromium trioxide to chromic acid, by factor and firm type**

Count in number of firms reporting

Firm type	Factor	No	Yes
U.S. producers	End uses other than finished products	***	***
U.S. producers	Market distinct for unfinished product	***	***
U.S. producers	Different physical characteristics	***	***
U.S. producers	Difference in value	***	***
U.S. producers	Conversion in finished product intensive	***	***
Importers	End uses other than finished products	3	3
Importers	Market distinct for unfinished product	4	2
Importers	Different physical characteristics	2	4
Importers	Difference in value	2	3
Importers	Conversion in finished product intensive	3	2

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Firm by firm narratives regarding semi-finished product analysis are available in appendix D.

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<sup>52</sup> Handling and transporting a hazardous corrosive liquid present greater risks of containment failure, as pressure or agitation could cause leaks that are more difficult to control than a dry spill. Petition, vol. 1, pp. 4–5.

<sup>53</sup> Neither petitioner nor respondents are aware of any liquid chromic acid entering the United States, only dry flake form. Conference transcript, pp. 58 (McAdams), 97 (Roche), 98 (O. Gulersen); Petition, vol. 1, p. 5; Petitioner postconference brief, exhibit 1, 20.

<sup>54</sup> Petition, p. 24.



## Part 2: Conditions of competition in the U.S. market

### U.S. market characteristics

Chromium trioxide is an inorganic compound with the molecular formula  $\text{CrO}_3$  in dry form and  $\text{H}_2\text{CrO}_4$  in solution form. It is the acidic anhydride of chromic acid and is typically used for wood preservation, metal finishing, and plating. It is also used in catalyst manufacturing, as an oxidizing agent, in glass and ceramic manufacturing, and in plastic plating and laboratory use. It is sometimes marketed as chromic acid in dry form and generally referred to as chromic acid in solution form.<sup>1</sup> Dry chromium trioxide is sold in can form, but can also be sold in sparger containers made from high density polyethylene such as totes, trucks, and rail cars. In the latter case, the customer will add water to the dry chromium trioxide using a rotating mixer and then return the sparger container to the producer.

U.S. producer ACC indicated that the market \*\*\* subject to distinctive conditions of competition. Five of six responding importers indicated that the market was not subject to distinctive conditions of competition. Specifically, U.S. producer ACC reported that \*\*\* were a distinct condition of competition, while importer \*\*\* reported that global demand has a large impact on pricing and availability, and that global demand is usually greater than global supply, so product becomes difficult to obtain and costs increase. It also added that ACC has capitalized on the shortage by raising prices on U.S. companies rather than investing to produce more during product shortages.

Apparent U.S. consumption of chromium trioxide decreased during January 2022 to December 2024. Overall, apparent U.S. consumption in 2024 was lower than in 2022.

### Channels of distribution

U.S. producer ACC sold mainly to \*\*\* while importers sold mainly to end users, as shown in table 2.1. Importers of chromium trioxide from India \*\*\* to end users, while importers of chromium trioxide from Turkey sold \*\*\*.

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<sup>1</sup> Petition, Vol. I.

**Table 2.1 Chromium trioxide: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent; interim is January through September

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributor	***	***	***	***	***
United States	End user	***	***	***	***	***
India	Distributor	***	***	***	***	***
India	End user	***	***	***	***	***
Turkey	Distributor	***	***	***	***	***
Turkey	End user	***	***	***	***	***
Subject sources	Distributor	***	***	***	***	***
Subject sources	End user	***	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***	***
Nonsubject sources	End user	***	***	***	***	***
All import sources	Distributor	***	***	***	***	***
All import sources	End user	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

## Geographic distribution

U.S. producer ACC and importers reported selling chromium trioxide to \*\*\* (table 2.2). For U.S. producers, \*\*\* percent of sales were within 100 miles of their production facility, \*\*\* percent were between 101 and 1,000 miles, and \*\*\* percent were over 1,000 miles. Importers sold \*\*\* percent within 100 miles of their U.S. point of shipment, \*\*\* percent between 101 and 1,000 miles, and \*\*\* percent over 1,000 miles.

**Table 2.2 Chromium trioxide: Count of U.S. producers' and U.S. importers' geographic markets**

Region	U.S. producers	India	Turkey	Subject sources
Northeast	***	***	***	2
Midwest	***	***	***	3
Southeast	***	***	***	4
Central Southwest	***	***	***	4
Mountain	***	***	***	1
Pacific Coast	***	***	***	1
Other	***	***	***	0
All regions (except Other)	***	***	***	0
Reporting firms	1	2	3	4

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

## Supply and demand considerations

### U.S. supply

Table 2.3 provides a summary of the supply factors regarding chromium trioxide from U.S. producers and from subject countries. Turkish capacity was approximately one-third greater than Indian capacity.

**Table 2.3 Chromium trioxide: Supply factors that affect the ability to increase shipments to the U.S. market, by country**

Quantity in pounds contained dry weight; ratio and share in percent

Factor	Measure	United States	India	Turkey	Subject suppliers
Capacity 2022	Quantity	***	***	***	***
Capacity 2024	Quantity	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***
Capacity utilization 2024	Ratio	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***
Inventories to total shipments 2024	Ratio	***	***	***	***
Home market shipments 2024	Share	***	***	***	***
Non-US export market shipments 2024	Share	***	***	***	***
Ability to shift production (firms reporting “yes”)	Count	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for all of U.S. production of chromium trioxide in 2024. Responding foreign producer/exporter firms accounted for \*\*\* of U.S. imports of chromium trioxide from India and Turkey during 2024. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 7.

### Domestic production

Based on available information, U.S. producers of chromium trioxide have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced chromium trioxide to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and existence of inventories. Factors mitigating responsiveness of supply include an inability to shift shipments from alternate markets or production to or from alternate products.

U.S. producer ACC’s capacity \*\*\* between 2022 and 2024 while production decreased, leading to a decrease in capacity utilization. It reported that its major export markets are \*\*\*

and stated that it cannot produce other products using the same equipment it uses to produce chromium trioxide.<sup>2</sup>

### **Subject imports from India**

Based on available information, the producer of chromium trioxide from India has the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of chromium trioxide to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating responsiveness of supply include almost no inventories and no ability to shift shipments from alternate markets or products.

The Indian producer's capacity \*\*\* between 2022 and 2024 while production decreased in 2023 but increased in 2024, ending lower than in 2023, leading to an increase in capacity utilization. Other major export markets include \*\*\*. No firm reported that other products can be produced using the same machinery as for chromium trioxide.

### **Subject imports from Turkey**

Based on available information, the producer of chromium trioxide from Turkey has the ability to respond to changes in demand with moderate to large changes in the quantity of shipments of chromium trioxide to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and existence of some inventories. Factors mitigating responsiveness of supply include no ability to shift shipments from alternate markets or products.

The Turkish producer's capacity \*\*\* between 2022 and 2024 while production decreased from 2022 to 2024, leading to a decrease in capacity utilization. Other major export markets include \*\*\*. No firm reported that other products can be produced using the same machinery as for chromium trioxide.

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<sup>2</sup> Conference transcript, p. 30 (Hansley).

## Imports from nonsubject sources

Nonsubject imports accounted for \*\*\* percent of total U.S. imports in 2024. The largest sources of nonsubject imports during January 2022 to September 2024 were Kazakhstan and South Africa.

## Supply constraints

U.S. producer ACC reported \*\*\* supply constraints since January 1, 2022. No U.S. importers reported experiencing supply constraints since January 1, 2022. U.S. producer ACC stated that \*\*\*.<sup>3</sup> U.S. importer and purchaser \*\*\* reported that ACC has refused to provide it with price quotes or sell to it.<sup>4</sup> U.S. producer ACC stated that \*\*\*.

In addition, a representative from Koppers stated that ACC would only sell to it via sparger truck or railcar until 2024, which it stated that it did not have the ability to take at the time.<sup>5</sup> A representative for Kobitex stated that the two major customers of chromium trioxide in the market, one purchases in drums, and the other purchases in sparger trucks or railcars. Kobitex also added that drum product was cheaper, but factory adjustments were needed to receive the product.<sup>6</sup>

## U.S. demand

Based on available information, the overall demand for chromium trioxide is likely to experience small to moderate changes in response to changes in price. The main contributing factors are the limited range of substitute products and the small cost share of chromium trioxide in most of its ultimate end-use products.

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<sup>3</sup> U.S. producer ACC's postconference brief, response to staff questions at 13.

<sup>4</sup> U.S. producer ACC's postconference brief, response to staff questions at 13.

<sup>5</sup> Conference transcript, p. 84 to 86 (Roche).

<sup>6</sup> Conference transcript, pp. 86 to 87 (Gulersen).

## End uses and cost share

U.S. demand for chromium trioxide depends on the demand for U.S.-produced downstream products. According to the petitioner, \*\*\*.<sup>7</sup> According to the petitioner, wood finishers use chromium trioxide to produce chromated copper arsenate, a wood preservative containing compounds of chromium, copper, and arsenic, which is then used in timber and other wood products, including protection from weathering and attack by microbes and insects.<sup>8</sup> As a surface treatment, it provides a durable, corrosion-resistant oxide finish to metal.

Chromium trioxide accounts for a small share of the cost of its ultimate end-use products in wood treatment and metal finishing, and a large share of the cost of its intermediate use products such as a wood preservative and CCA. Reported cost shares were 20 percent for CCA treated wood, 10 percent for metal finishing, 48 percent for CCA, and 75 percent for wood preservative.

## Business cycles

U.S. producer ACC indicated that the market \*\*\* subject to business cycles. Four of six responding importers indicated that the market was not subject to business cycles. Specifically, U.S. importer/purchaser \*\*\* reported that demand is usually heavier during hurricane seasons and slows down the last month of the year and the first few months of the year, and that demand drops when automotive or aerospace manufacturing experience downturns. U.S. importer/purchaser \*\*\* reported that demand trends with manufacturing.

## Demand trends

U.S. producer ACC reported that U.S. demand had \*\*\* since January 1, 2022. Specifically, ACC reported that \*\*\*. Half of responding U.S. importers reported that U.S. demand had either fluctuated down or steadily decreased, while the other half reported that demand had not changed. U.S. importers reporting a decrease in U.S. demand cited environmental, health, and safety (EHS) considerations, slight declines in industrial and non-

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<sup>7</sup> Petition, Volume I, p. 28.

<sup>8</sup> Chromated arsenicals, which include chromated copper arsenate (CCA), are classified as a restricted use product by the U.S. Environmental Protection Agency (EPA). CCAs have been used as wood preservative pesticides since the 1940s, must be applied by certified pesticide applicators only, and pose risks to workers in wood treatment facilities, aquatic invertebrates, and plants. Their use in residential structures such as decks, playsets has been discontinued since 2004. Environmental Protection Agency, [Chromated Arsenicals \(CCA\) | US EPA](#), retrieved November 18, 2025.

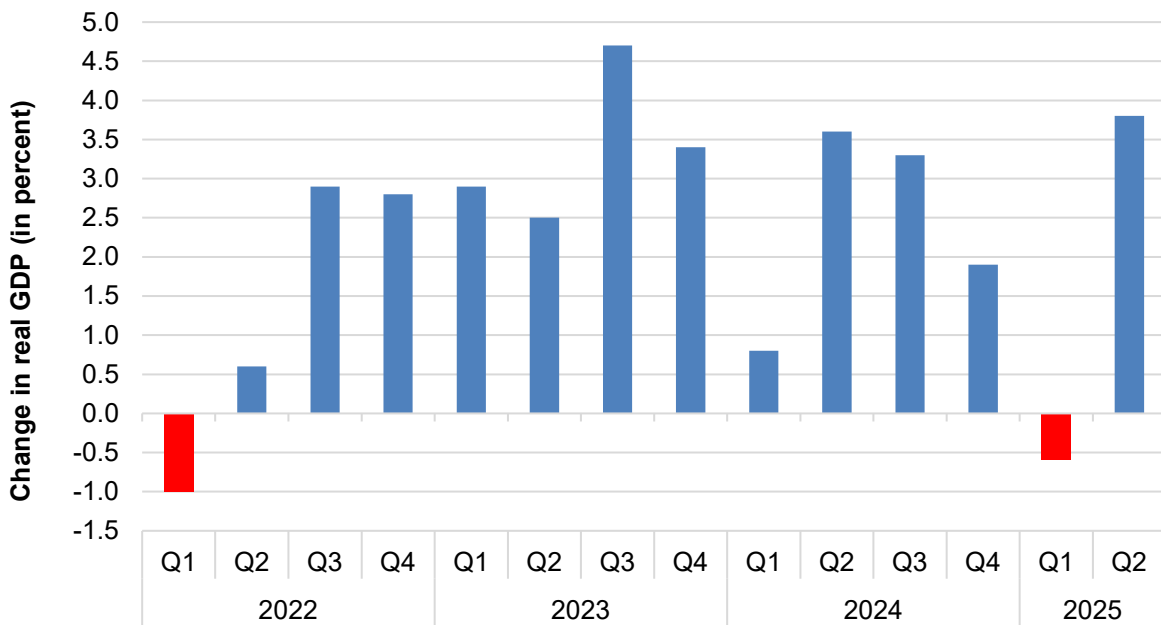
residential uses, CCA being replaced by ACQ and copper azole in residential and consumer markets, and fluctuation following the automotive or industrial consumer markets.

Demand for chromium trioxide is driven by general economic conditions, Gross Domestic Product (GDP) growth (figure 2.1 and table 2.4), and construction spending (figures 2.2 and 2.3, and tables 2.5 and 2.6.<sup>9</sup> As shown in table 2.4, seasonally-adjusted real GDP contracted in the first quarter of 2022 but then grew steadily through the third quarter of 2023, before fluctuating until the first quarter of 2025, during which it contracted before increasing again in the second quarter of 2025.

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<sup>9</sup> Conference transcript, p. 31 (McAdams).

**Figure 2.1 Chromium trioxide: Real GDP, seasonally adjusted annual rate, quarterly, Q1 2022 through Q2 2025**



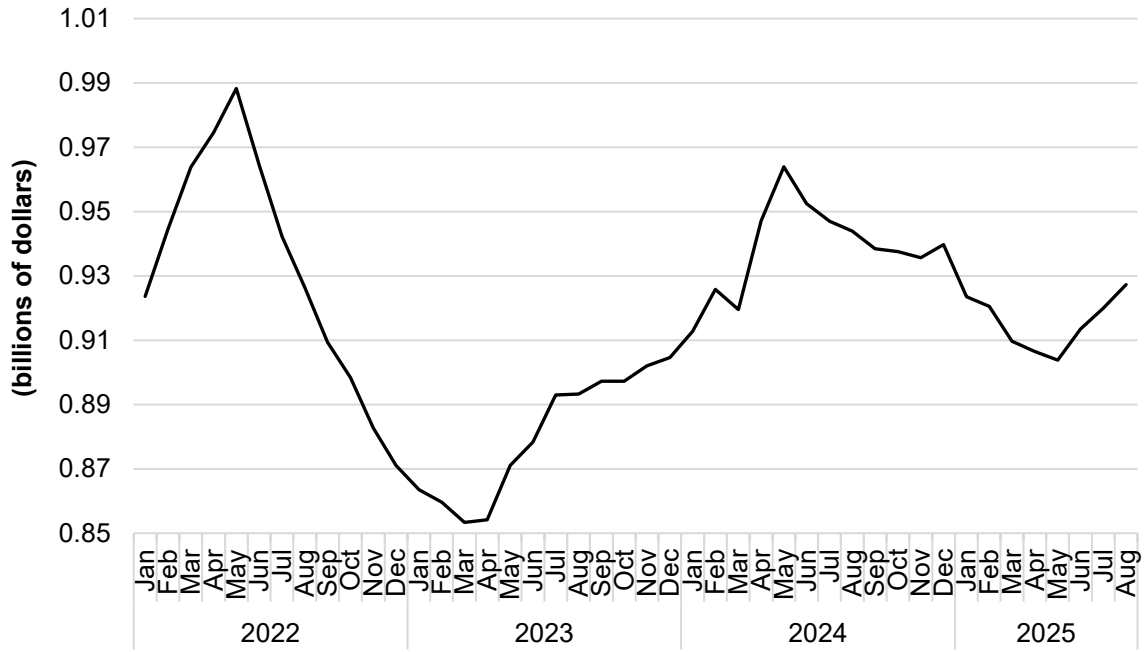
Source: U.S. Bureau of Economic Analysis, “Gross Domestic Product, 2<sup>nd</sup> quarter 2025 (Third Estimate), GDP by Industry, Corporate Profits (Revised), and Annual Update”, news release (September 25, 2025), <https://www.bea.gov/sites/default/files/2025-09/gdp2q25-3rd.xlsx>, retrieved December 8, 2025.

**Table 2.4 Chromium trioxide: Real GDP, seasonally adjusted annual rate, quarterly, Q1 2022 through Q2 2025**

Quarter	2022	2023	2024	2025
Q1	-1.0	2.9	0.8	-0.6
Q2	0.6	2.5	3.6	3.8
Q3	2.9	4.7	3.3	—
Q4	2.8	3.4	1.9	—

Source: U.S. Bureau of Economic Analysis, “Gross Domestic Product, 2<sup>nd</sup> quarter 2025 (Third Estimate), GDP by Industry, Corporate Profits (Revised), and Annual Update”, news release (September 25, 2025), <https://www.bea.gov/sites/default/files/2025-09/gdp2q25-3rd.xlsx>, retrieved December 8, 2025.

**Figure 2.2 Chromium trioxide: Total residential construction spending in the United States, billions of Dollars, monthly, seasonally adjusted annual rate**



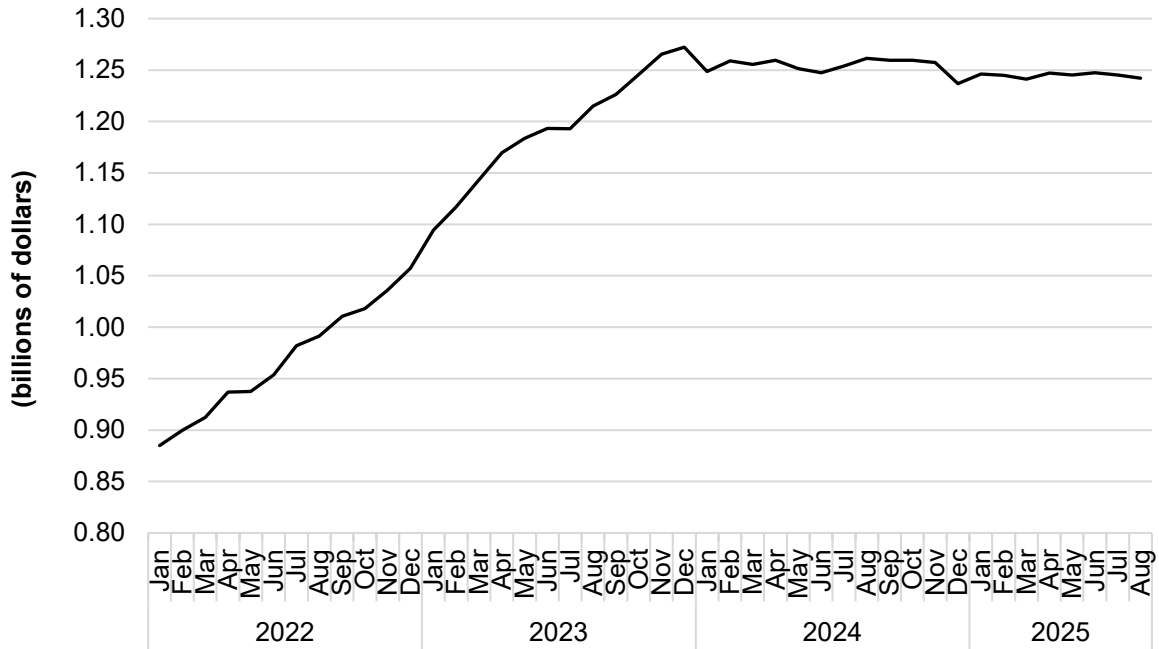
**Table 2.5 Chromium trioxide: Total residential construction spending in the United States, millions of Dollars, monthly, seasonally adjusted annual rate**

Spending in millions of Dollars

<b>Month</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
January	923,595	863,557	912,796	923,551
February	944,418	859,624	925,821	920,572
March	963,823	853,359	919,502	909,661
April	974,556	854,124	947,059	906,503
May	988,269	871,099	963,902	903,854
June	964,347	878,384	952,517	913,515
July	942,248	892,997	946,982	919,941
August	926,427	893,316	943,874	927,260
September	909,346	897,219	938,409	—
October	898,393	897,269	937,550	—
November	882,720	902,002	935,625	—
December	871,124	904,580	939,734	—

Source: U.S. Census Bureau, Total Construction Spending: Residential in the United States \*\*\*, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TLRESCONS>, November 24, 2025.

**Figure 2.3 Chromium trioxide: Total nonresidential construction spending in the United States, billions of Dollars, monthly, seasonally adjusted annual rate**



Source: U.S. Census Bureau, Total Construction Spending: Nonresidential in the United States \*\*\*, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TLNRESCONS>, November 24, 2025.

**Table 2.6 Chromium trioxide: Total nonresidential construction spending in the United States, millions of Dollars, monthly, seasonally adjusted annual rate**

Spending in millions of Dollars

Month	2022	2023	2024	2025
January	884,924	1,094,405	1,248,609	1,246,043
February	899,925	1,117,072	1,258,796	1,244,859
March	912,293	1,143,042	1,255,361	1,241,186
April	936,767	1,169,497	1,259,435	1,246,937
May	937,613	1,183,436	1,251,447	1,245,271
June	953,616	1,193,175	1,247,329	1,247,227
July	982,080	1,192,776	1,253,764	1,245,075
August	991,179	1,214,961	1,261,448	1,242,208
September	1,010,585	1,226,261	1,259,531	—
October	1,017,976	1,245,466	1,259,566	—
November	1,036,194	1,265,298	1,257,306	—
December	1,057,270	1,272,216	1,236,909	—

Source: U.S. Census Bureau, Total Construction Spending: Nonresidential in the United States <sup>\*\*\*</sup>, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TLNRESCONS>, November 24, 2025.

### Substitute products

U.S. producer ACC reported that <sup>\*\*\*</sup>. It stated that there have been no commercially viable alternatives to impart the same characteristics on a plated product that chromium trioxide can do. All six responding U.S. importers reported that there were no substitutes.

### Substitutability issues

This section assesses the degree to which U.S.-produced chromium trioxide and imports of chromium trioxide from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of chromium trioxide from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate degree of substitutability between domestically produced chromium

trioxide and chromium trioxide imported from subject sources.<sup>10</sup> Factors contributing to this level of substitutability include similar quality and lead times for chromium trioxide from inventories, and little preference for particular country of origin or producers. Factors reducing substitutability include limited availability of certain packaging formats, different lead times from domestic and subject sources for chromium trioxide that is produced to order, certain types of chromium trioxide only being available only from subject sources, and significant factors other than price that firms consider.

## Factors affecting purchasing decisions

### Most important purchase factors

Purchasers responding to lost sales lost revenue allegations<sup>11</sup> were asked to identify the main purchasing factors their firm considered in their purchasing decisions for chromium trioxide.

The most often cited factor firms consider in their purchasing decisions for chromium trioxide was reliability/supply, as shown in table 2.7. Quality and product packaging (e.g. drums, railcars) were the most frequently cited first-most important factors (cited by two firms each), reliability/supply was the most frequently reported second-most important factor (three firms); and price/cost was the most frequently reported third-most important factor (three firms).

**Table 2.7 Chromium trioxide: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Factor	First	Second	Third	Total
Price / Cost	0	0	3	3
Quality	2	1	0	2
Reliability / Supply	0	3	1	3
Product packaging	2	0	0	2

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>10</sup> The degree of substitution between domestic and imported chromium trioxide depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced chromium trioxide to the chromium trioxide imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

<sup>11</sup> This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part 5 for additional information.

## Lead times

U.S. producer ACC primarily sells its chromium trioxide \*\*\*. U.S. importers primarily sell chromium trioxide from foreign inventories. U.S. producer ACC reported that \*\*\* percent of its commercial shipments were \*\*\*, with lead times averaging \*\*\* days. The remaining \*\*\* percent of its commercial shipments came from inventories, with lead times averaging \*\*\* days. U.S. importers reported that \*\*\* percent of its commercial shipments were from foreign inventories, with lead times averaging \*\*\* days. \*\*\* percent of U.S. importers' commercial shipments were produced-to-order, averaging \*\*\* days, and the remaining \*\*\* percent were from U.S. inventories, averaging \*\*\* days.

## Comparison of U.S.-produced and imported chromium trioxide

In order to determine whether U.S.-produced chromium trioxide can generally be used in the same applications as imports from India and/or Turkey, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. U.S. producer ACC reported that chromium trioxide can \*\*\* be used interchangeably across sources. As shown in table 2.8, equal numbers of U.S. importers reported that chromium trioxide was either always or sometimes interchangeable between the U.S. and India, and the majority of importers reported that it was always interchangeable between the U.S. and Turkey. U.S. importer \*\*\* reported that chromium trioxide produced in the United States was superior in quality and reliability compared to chromium trioxide produced in India, that chromium trioxide produced in Turkey was superior in quality compared to chromium trioxide produced in the United States, and that product produced in Turkey was superior in quality to product produced in India.

**Table 2.8 Chromium trioxide: Count of U.S. importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	2	0	2	0
U.S. vs. Turkey	3	0	2	0
U.S. vs. other	2	0	2	0
India vs. Turkey	2	0	1	0
India vs. Other	2	0	1	0
Turkey vs. Other	2	0	1	0

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of chromium trioxide from the United States, subject,

or nonsubject countries. U.S. producer ACC reported that factors other than price were \*\*\* significant in sales of chromium trioxide between all sources. As seen in table 2.9, the majority of U.S. importers reported that factors other than price were always significant between the United States and India and between United States and Turkey. In citing non-price factors, U.S. importer/purchaser \*\*\* it needed to be able to \*\*\*, and U.S. importer \*\*\* cited quality factors.

**Table 2.9 Chromium trioxide: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. India	2	1	1	0
U.S. vs. Turkey	3	0	2	0
U.S. vs. other	1	1	1	0
India vs. Turkey	2	0	1	0
India vs. Other	1	0	1	0
Turkey vs. Other	1	0	1	0

Source: Compiled from data submitted in response to Commission questionnaires.



# Part 3: U.S. producer’s production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of one firm that accounted for all known U.S. production of chromium trioxide during 2024.

## U.S. producer

The Commission issued a U.S. producer questionnaire to one firm based on information contained in the petition. One firm provided usable data on their operations. Table 3.1 lists U.S. producer of chromium trioxide, their production locations, positions on the petition, and shares of total production.

**Table 3.1 Chromium trioxide: U.S. producer, their position on the petition, production locations, and shares of reported production, 2024**

Shares in percent

Firm	Position on petition	Production locations	Share of production
ACC	Petitioner	Castle Hayne, NC	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.2 presents information on the U.S. producer’s ownership, related and/or affiliated firms.

**Table 3.2 Chromium trioxide: U.S. producer’s ownership, related and/or affiliated firms**

Reporting firm	Relationship type and related firm	Details of relationship
ACC	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

As indicated in table 3.2, \*\*\* U.S. producers are related to foreign producers of the subject merchandise and \*\*\* U.S. producers are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail below, \*\*\* U.S. producers directly import chromium trioxide from subject sources and \*\*\* purchase chromium trioxide from subject sources through U.S. importers.

Table 3.3 presents events in the U.S. industry since January 1, 2022.

**Table 3.3 Chromium trioxide: Important industry events since January 1, 2022**

Item	Firm	Event
Prolonged slowdown	Elementis	Early 2022: Unplanned maintenance at the Castle Hayne plant (North Carolina), then owned by Elementis Chromium, reduced the production of chromium products.
Acquisition	Yildirim	January 31, 2023: Yildirim (Turkey) completed its acquisition of Elementis Chromium. Renamed the operation American Chrome and Chemicals (ACC).
Acquisition	CoreX Holdings	2024: Yildirim restructured, and ACC was placed under CoreX Holding (Turkey/Netherlands), a separate, newly formed company.
Prolonged shutdown	ACC	2025: ACC's production at the Castle Hayne plant was impacted by an unspecified shutdown.

Source: Elementis Annual Report and Accounts 2022, pp. 85, 212, [https://www.elementis.com/fileadmin/elementis/Investor\\_Relations/Investor\\_Information/Results\\_Reports\\_Presentations/Annual\\_Reports/Elementis\\_Annual\\_Report\\_2022.pdf](https://www.elementis.com/fileadmin/elementis/Investor_Relations/Investor_Information/Results_Reports_Presentations/Annual_Reports/Elementis_Annual_Report_2022.pdf); ACC website, "About Us," accessed December 5, 2025, <https://americanchromechemicals.com/about-us>; Yildirim Group, Annual Report 2023, p. 23, <https://www.yildirimgroup.com/media/Annual/Annual-Report-2023.pdf>; CoreX Annual Report 2024, pp. 8, 15, 93, 94, [https://www.corexholding.com/media/Corex\\_Annual%20Report\\_2024\\*\\*\\*.pdf](https://www.corexholding.com/media/Corex_Annual%20Report_2024***.pdf); Conference transcript, pp. 72 (Roche) and 125 (Jacobson).

The producer in the United States was asked to report any change in the character of their operations or organization relating to the production of chromium trioxide since 2022. The producer indicated in their questionnaire that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

**Table 3.4 Chromium trioxide: U.S. producer's reported changes in operations, since January 1, 2022**

<b>Item</b>	<b>Narrative response on changes in operations</b>
Prolonged shutdowns	***
Acquisitions	***

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. production, capacity, and capacity utilization

Table 3.5 presents the U.S. producer’s installed and practical capacity and production on the same equipment. From 2022 to 2024, installed overall capacity \*\*\*. Practical overall capacity and practical chromium trioxide capacity \*\*\*.

**Table 3.5 Chromium trioxide: U.S. producer’s installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 pounds CDW; utilization in percent; interim is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical chromium trioxide	Capacity	***	***	***	***	***
Practical chromium trioxide	Production	***	***	***	***	***
Practical chromium trioxide	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.6 presents the U.S. producer's reported narratives regarding practical capacity constraints.

**Table 3.6 Chromium trioxide: U.S. producer's reported capacity constraints since January 1, 2022**

<b>Item</b>	<b>Narrative response on constraints to practical overall capacity</b>
Production bottlenecks	***
Existing labor force	***
Supply of material inputs	***
Storage capacity	***
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Figure 3.1 presents the U.S. producer's production, capacity, and capacity utilization for its chromium trioxide operations.

**Figure 3.1 Chromium trioxide: ACC's capacity, production, and capacity utilization, by period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## Alternative products

As shown in table 3.7, about \*\*\* percent of the chromium trioxide produced by the U.S. producer during the period of data collection was CDW. CDW share of production declined by \*\*\* percentage points between 2022 and 2024 while overall chromium trioxide production on the same equipment \*\*\* by \*\*\* percent between 2022 and 2024.

**Table 3.7 Chromium trioxide: ACC's overall production on the same equipment as in-scope production, by product type and period**

Quantity in 1,000 pounds; Share in percent; Interim period is January through September

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Chromium trioxide: CDW	Quantity	***	***	***	***	***
Chromium trioxide: Other elements	Quantity	***	***	***	***	***
Chromium trioxide: Total weight	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Chromium trioxide: CDW	Share	***	***	***	***	***
Chromium trioxide: Other elements	Share	***	***	***	***	***
Chromium trioxide: Total weight	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". \*\*\*.

## U.S. producer’s U.S. shipments and exports

Table 3.8 and figure 3.1 present the U.S. producer’s U.S. shipments, export shipments, and total shipments. The U.S. producer’s U.S. shipments accounted for approximately \*\*\* percent of the U.S. producer’s total shipments during the period of data collection. The U.S. producer’s export shipments, which accounted for \*\*\* percent of total shipments in quantity terms in 2024. The U.S. producer’s U.S. shipments \*\*\* from \*\*\* pounds in 2022 to \*\*\* pounds in 2023, before \*\*\* to \*\*\* pounds in 2024 and were \*\*\* percent higher in interim 2025 than in interim 2024. Export shipments decreased overall by \*\*\* percent by quantity between 2022 to 2024 and were \*\*\* percent lower in interim 2025 than in interim 2024. Export shipments by value decreased \*\*\* percent between 2022 to 2024 and were \*\*\* percent lower in interim 2025 than in interim 2024. The average unit value of U.S. shipments and export shipments increased \*\*\* percent from 2022 to 2024 and was \*\*\* percent lower in interim 2025 than in interim 2024.

**Table 3.8 Chromium trioxide: ACC’s total shipments, by destination and period**

Quantity in 1,000 pounds CDW; value in 1,000 dollars; unit values in dollars per pound CDW; shares in percent; interim period is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure 3.1 Chromium trioxide: U.S. shipments and exports shipments quantities and average unit values, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. producer's inventories

Table 3.9 presents the U.S. producer's end-of-period inventories and the ratio of these inventories to the U.S. producer's production, U.S. shipments, and total shipments. The U.S. producer's inventories increased by \*\*\* percent from 2022 to 2024 and was \*\*\* percent higher in interim 2025 than in interim 2024. The ratio of U.S. producer's inventories to U.S. production increased by \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024. The ratio of inventories to U.S. shipments increased by \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024.

**Table 3.9 Chromium trioxide: U.S. producer's inventories and their ratio to select items, by period**

Quantity in 1,000 pounds CDW; Ratios in percent; Interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

## U.S. producer’s imports from subject sources

The responding U.S. producer did not report imports of chromium trioxide from subject sources 2022 to 2024 and both interim periods.

## U.S. producer’s purchases of imports from subject sources

The responding U.S. producer did not report purchases of chromium trioxide from 2022 to 2024 and both interim periods.

## U.S. employment, wages, and productivity

Table 3.10 shows U.S. producer’s employment-related data. The number of production and related workers (“PRWs”) reported by the U.S. producer increased by \*\*\* percent from 2022 to 2024 and \*\*\* from interim 2025 to interim 2024. Total hours worked increased by \*\*\* percent from 2022 to 2024 and \*\*\* from interim 2025 to interim 2024. Hours worked per PRW increased \*\*\* percent from 2022 to 2024 and \*\*\* from interim 2025 to interim 2024. Wages paid increased \*\*\* percent from 2022 to 2024 and was \*\*\* percent lower in interim 2025 than in interim 2024. Hourly wages paid increased \*\*\* percent from 2022 to 2024 and were \*\*\* percent lower in interim 2025 than in interim 2024. Productivity (pounds CDW per hour) decreased \*\*\* percent from 2022 to 2024 and was \*\*\* percent higher in interim 2025 than in interim 2024.

**Table 3.10 Chromium trioxide: ACC’s employment related information, by item and period**

Interim is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (1,000 dollars)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (pounds CDW per hour)	***	***	***	***	***
Unit labor costs (dollars per pound CDW)	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.



## Part 4: U.S. imports, apparent U.S. consumption, and market shares

### U.S. importers

The Commission issued importer questionnaires to 13 firms believed to be importers of subject chromium trioxide, as well as to all U.S. producers of chromium trioxide.<sup>1</sup> Usable questionnaire responses were received from 11 companies, representing \*\*\* percent of U.S. imports from India and Turkey in 2024 under HTS subheading 2819.10.00, a “basket” category.<sup>2</sup> Table 4.1 lists all responding U.S. importers of chromium trioxide from India and Turkey and other sources, their locations, and their shares of U.S. imports, in 2024.

**Table 4.1 Chromium trioxide: U.S. importers, their headquarters, and share of imports within each source, 2024 Shares in percent**

Firm	Headquarters	India	Turkey	Subject sources	Nonsubject sources	All import sources
Hunter	Fort Washington, PA	***	***	***	***	***
Kobitex	Toronto, ON	***	***	***	***	***
Koppers	Pittsburgh, PA	***	***	***	***	***
Phibro	Teaneck, NJ	***	***	***	***	***
Plating International	Franklin Park, IL	***	***	***	***	***
Vishnu	Hyderabad,	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

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<sup>1</sup> The Commission issued questionnaires to those firms identified in the petitions; staff research; and proprietary, Census-edited Customs' import records. five firms (\*\*\*) certified that it had not imported chromium trioxide in the United States and any time since January 1, 2022.

<sup>2</sup> Due to double counting of imports, staff adjusted the data to more accurately reflect activity during the period of investigations. Staff received a revision to import data but not in time for incorporation.

## U.S. imports

Table 4.2 and figure 4.1 present data for U.S. imports of chromium trioxide from India and Turkey and all other sources. Imports of chromium trioxide from all import sources, by quantity, decreased by \*\*\* percent from 2022 to 2024 and was \*\*\* percent higher in interim 2025 than in interim 2024. Imports from subject sources, by quantity, increased by \*\*\* percent from 2022 to 2024 and were \*\*\* percent higher in interim 2025 than in interim 2024. Imports from all import sources, by value, decreased by \*\*\* percent from 2022 to 2024 and were \*\*\* percent higher in interim 2025 than in interim 2024. Imports from subject sources, by value, decreased by \*\*\* percent from 2022 to 2024 and were \*\*\* higher in interim 2025 than in interim 2024. The average unit value (“AUV”) of imports from all sources decreased by \*\*\* percent from 2022 to 2024 and was \*\*\* percent higher in interim 2025 than in interim 2024. The AUV of imports from subject sources decreased by \*\*\* percent from 2022 to 2024 and was \*\*\* percent higher in interim 2025 than in interim 2024.

**Table 4.2 Chromium trioxide: U.S. imports by source and period**

Quantity in 1,000 pounds CDW; value in 1,000 dollars; unit value in dollars per pound CDW; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
India	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
India	Value	***	***	***	***	***
Turkey	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Turkey	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table continued.

The share of quantity of imports from India \*\*\* from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024. subject sources increased \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024. The share of quantity of all import sources decreased \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024. The share of quantity of imports from Turkey increased by \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points higher in interim 2025 than in interim 2024.

**Table 4.2 (Continued) Chromium trioxide: Share of U.S. imports by source and period**

Shares and ratio in percent; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
India	Share of quantity	***	***	***	***	***
Turkey	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
India	Share of value	***	***	***	***	***
Turkey	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
India	Ratio	***	***	***	***	***
Turkey	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to production.

**Figure 4.1 Chromium trioxide: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.3 presents data for changes in U.S. imports of chromium trioxide, by source and period from 2022 to 2024 and interim 2023 to interim 2024.

**Table 4.3 Chromium trioxide: Changes in U.S. imports, by source and period**

Changes ( $\Delta$ ) in percent (%) or percentage point (ppt)

Source	Measure	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024 to 2025
India	% $\Delta$ Quantity	▼***	▼***	▲***	▲***
Turkey	% $\Delta$ Quantity	▲***	▲***	▲***	▲***
Subject sources	% $\Delta$ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	% $\Delta$ Quantity	▼***	▲***	▼***	▼***
All import sources	% $\Delta$ Quantity	▼***	▲***	▼***	▲***
India	% $\Delta$ Value	▼***	▼***	▲***	▲***
Turkey	% $\Delta$ Value	▲***	▲***	▼***	▲***
Subject sources	% $\Delta$ Value	▼***	▲***	▼***	▲***
Nonsubject sources	% $\Delta$ Value	▼***	▼***	▼***	▼***
All import sources	% $\Delta$ Value	▼***	▲***	▼***	▲***
India	% $\Delta$ Unit value	▼***	▼***	▼***	▲***
Turkey	% $\Delta$ Unit value	▼***	▲***	▼***	▲***
Subject sources	% $\Delta$ Unit value	▼***	▼***	▼***	▲***
Nonsubject sources	% $\Delta$ Unit value	▼***	▼***	▼***	▼***
All import sources	% $\Delta$ Unit value	▼***	▼***	▼***	▲***
India	ppt $\Delta$ Quantity	▼***	▼***	▲***	▲***
Turkey	ppt $\Delta$ Quantity	▲***	▲***	▲***	▼***
Subject sources	ppt $\Delta$ Quantity	▲***	▲***	▲***	▲***
Nonsubject sources	ppt $\Delta$ Quantity	▼***	▼***	▼***	▼***
All import sources	ppt $\Delta$ Quantity	***	***	***	***
India	ppt $\Delta$ Value	▼***	▼***	▲***	▲***
Turkey	ppt $\Delta$ Value	▲***	▲***	▲***	▼***
Subject sources	ppt $\Delta$ Value	▲***	▲***	▲***	▲***
Nonsubject sources	ppt $\Delta$ Value	▼***	▼***	▼***	▼***
All import sources	ppt $\Delta$ Value	***	***	***	***
India	ppt $\Delta$ Ratio	▲***	▼***	▲***	▲***
Turkey	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***
Subject sources	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***
Nonsubject sources	ppt $\Delta$ Ratio	▼***	▲***	▼***	▼***
All import sources	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>3</sup> Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.<sup>4</sup> Imports from India accounted for \*\*\* percent and Turkey \*\*\* of total imports of chromium trioxide by quantity from September 2024 through August 2024 (table 4.4).

**Table 4.4 Chromium trioxide: U.S. imports in the twelve-month period preceding the filing of the petition, September 2024 through August 2025**

Quantity in 1,000 pounds CDW; share of quantity in percent

Source of imports	Quantity	Share of quantity
India	***	***
Turkey	***	***
All other sources	***	***
All import sources	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

<sup>3</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

<sup>4</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

## Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part 2. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

### Fungibility

Table 4.5 and figure 4.2 present U.S. importers' U.S. shipments of imports in 2024 by source and product form: shipped and delivered dry, converted to liquid at customer, and shipped and delivered liquid. The majority of U.S. chromium trioxide shipments were shipped and delivered dry, comprising \*\*\* percent of U.S. producers, \*\*\* percent of imports from India, and \*\*\* percent of imports from Turkey.

**Table 4.5 Chromium trioxide: ACC's and U.S. importers' U.S. shipments, by source and product form, 2024**

Quantity in 1,000 pounds CDW

Source	Shipped and delivered dry	Converted to liquid at customer	Shipped and delivered liquid	All product forms
U.S. producers	***	***	***	***
India	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

**Table 4.5 (Continued) Chromium trioxide: ACC's and U.S. importers' U.S. shipments, by source and product form, 2024**

Share across in percent

Source	Shipped and delivered dry	Converted to liquid at customer	Shipped and delivered liquid	All product forms
U.S. producers	***	***	***	100.0
India	***	***	***	100.0
Turkey	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

**Table 4.5 (Continued) Chromium trioxide: ACC's and U.S. importers' U.S. shipments, by source and product form, 2024**

Share down in percent

Source	Shipped and delivered dry	Converted to liquid at customer	Shipped and delivered liquid	All product forms
U.S. producers	***	***	***	***
India	***	***	***	***
Turkey	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Only one U.S. importer \*\*\* imports dry chromium trioxide from subject sources and then further processes it into liquid form in the United States prior to shipping it to its U.S. customers.

**Figure 4.2 Chromium trioxide: ACC's and U.S. importers' U.S. shipments, by source and product form, 2024**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## Geographical markets

Table 4.6 presents U.S. imports of chromium trioxide by source and by border of entry in 2024. U.S. imports of chromium trioxide from subject sources entered predominately in the Eastern border (\*\*\*) percent) and Southern border (\*\*\*) percent), and to a lesser extent, in the Northern border (\*\*\*) percent). Imports of chromium trioxide from subject sources constituted \*\*\* percent of imports in the Eastern border, \*\*\* percent of imports in the Northern border, and \*\*\* of imports in the Southern border.

**Table 4.6 Chromium trioxide: U.S. imports, by source and by border of entry, 2024**

Quantity in 1,000 pounds CDW

Source	East	North	South	West	All borders
India	—	—	1,785	—	1,785
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	1,754	474	3,002	197	5,427
All import sources	***	***	***	***	***

Table continued.

**Table 4.6 (Continued) Chromium trioxide: U.S. imports by source and border of entry, 2024**

Share across in percent

Source	East	North	South	West	All borders
India	—	—	100.0	—	100.0
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	32.3	8.7	55.3	3.6	100.0
All import sources	***	***	***	***	***

Table continued.

**Table 4.6 (Continued) Chromium trioxide: U.S. imports by source and border of entry, 2024**

Share down in percent

Source	East	North	South	West	All borders
India	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 2819.10.0000, accessed November 21, 2025 to add in imports from Turkey using proprietary, Census-edited Customs records under the same primary HTS statistical reporting number. Imports area based on the imports for consumption data series.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Only one U.S. importer \*\*\* imports dry chromium trioxide from subject sources and then further processes it into liquid form in the United States prior to shipping it to its U.S. customers.

## Presence in the market

Table 4.7 and figures 4.3 and 4.4 present U.S. imports of chromium trioxide by month and source. Imports of chromium trioxide from subject and nonsubject sources \*\*\*, during each year during the period of investigation.

**Table 4.7 Chromium trioxide: Quantity of U.S. imports, by source and month**

Quantity in 1,000 pounds CDW

Year	Month	India	Turkey	Subject sources	Nonsubject sources	All import sources
2022	January	—	***	***	606	***
2022	February	159	***	***	534	***
2022	March	359	***	***	633	***
2022	April	159	***	***	768	***
2022	May	—	***	***	1,155	***
2022	June	198	***	***	499	***
2022	July	—	***	***	668	***
2022	August	159	***	***	390	***
2022	September	317	***	***	353	***
2022	October	558	***	***	961	***
2022	November	238	***	***	1,083	***
2022	December	556	***	***	843	***
2023	January	397	***	***	328	***
2023	February	238	***	***	1,211	***
2023	March	556	***	***	702	***
2023	April	198	***	***	1,105	***
2023	May	—	***	***	257	***
2023	June	—	***	***	370	***
2023	July	317	***	***	128	***
2023	August	—	***	***	942	***
2023	September	278	***	***	742	***
2023	October	—	***	***	170	***
2023	November	198	***	***	571	***
2023	December	198	***	***	428	***

Table continued

**Table 4.7 (Continued) Chromium trioxide: Quantity of U.S. imports, by source and month**

Quantity in 1,000 pounds CDW

Year	Month	India	Turkey	Subject sources	Nonsubject sources	All import sources
2024	January	278	***	***	729	***
2024	February	—	***	***	331	***
2024	March	506	***	***	642	***
2024	April	119	***	***	1,079	***
2024	May	—	***	***	100	***
2024	June	—	***	***	801	***
2024	July	—	***	***	376	***
2024	August	—	***	***	187	***
2024	September	573	***	***	395	***
2024	October	—	***	***	275	***
2024	November	—	***	***	358	***
2024	December	309	***	***	153	***
2025	January	—	***	***	101	***
2025	February	220	***	***	225	***
2025	March	220	***	***	464	***
2025	April	463	***	***	735	***
2025	May	946	***	***	90	***
2025	June	220	***	***	782	***
2025	July	64	***	***	734	***
2025	August	220	***	***	246	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 2819.10.0000, accessed November 21, 2025 to add in imports from Turkey using proprietary, Census-edited Customs records under the same primary HTS statistical reporting number. Imports area based on the imports for consumption data series.

**Figure 4.3 Chromium trioxide: U.S. imports from individual subject sources, by month**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 2819.10.0000, accessed November 21, 2025 to add in imports from Turkey using proprietary, Census-edited Customs records under the same primary HTS statistical reporting number. Imports area based on the imports for consumption data series.

**Figure 4.4 Chromium trioxide: U.S. imports from aggregated subject and nonsubject sources, by month**

\* \* \* \* \*

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 2819.10.0000, accessed November 21, 2025 to add in imports from Turkey using proprietary, Census-edited Customs records under the same primary HTS statistical reporting number. Imports area based on the imports for consumption data series.

## Apparent U.S. consumption and market shares

### Quantity

Table 4.8 presents data on apparent U.S. consumption and U.S. market shares by quantity for chromium trioxide. Apparent consumption decreased by \*\*\* percent from 2022 to 2024 but was \*\*\* percent higher in interim 2025 than in interim 2024.

**Table 4.8 Chromium trioxide: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in 1,000 pounds CDW; shares in percent; interim period is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Turkey	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure 4.5 Chromium trioxide: Apparent U.S. consumption based on quantity, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires

### **Value**

Table 4.9 presents data on apparent U.S. consumption and U.S. market shares by value for chromium trioxide. Apparent consumption decreased by \*\*\* percent from 2022 to 2024 but was \*\*\* percent higher in interim 2025 than in interim 2024. The share of value held by U.S. producers increased by \*\*\* percentage points from 2022 to 2024 and was \*\*\* percentage points lower in interim 2025 than in interim 2024.

**Table 4.9 Chromium trioxide: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent; interim is January through September

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Turkey	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Turkey	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure 4.6 Chromium trioxide: Apparent U.S. consumption based on value, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## Part 5: Pricing data

### Factors affecting prices

#### Raw material costs

The major raw materials for chromium trioxide are chemical grade chromite ore and soda ash. Once sodium dichromate dihydrate is produced, it is mixed with sulfuric acid and sodium bisulfate. Almost 100 percent of chromite ore used to produce chromium chemicals in the United States is imported from South Africa, and India, Kazakhstan, South Africa, and Turkey are responsible for more than 85 percent of global chromite ore production.<sup>1</sup> The United States is the second-largest sodium carbonate producer in the world, and most producers operate around the Green River basin in southwest Wyoming. Sodium carbonate consumption decreased by 0.2 percent between 2021 and 2024, and is projected to increase by 1.2 percent between 2024 and 2029.<sup>2</sup> The Producer Price Index for Chemicals and Allied Products: Alkalies and Chlorine, Including Natural Sodium Carbonate and Sulfate increased until January 2023. The PPI then decreased steadily until its trough in April 2024, subsequently fluctuated downwards until September 2024, after which it fluctuated upwards, ending 1.4 percent higher in September 2025 compared to April 2024 (figure 5.1 and table 5.1)<sup>3</sup>.

Raw materials, as a share of U.S. producers' cost of goods sold (COGS), declined slightly from \*\*\* percent in 2022 to \*\*\* percent in 2024, and were \*\*\* percent in January to September 2025.

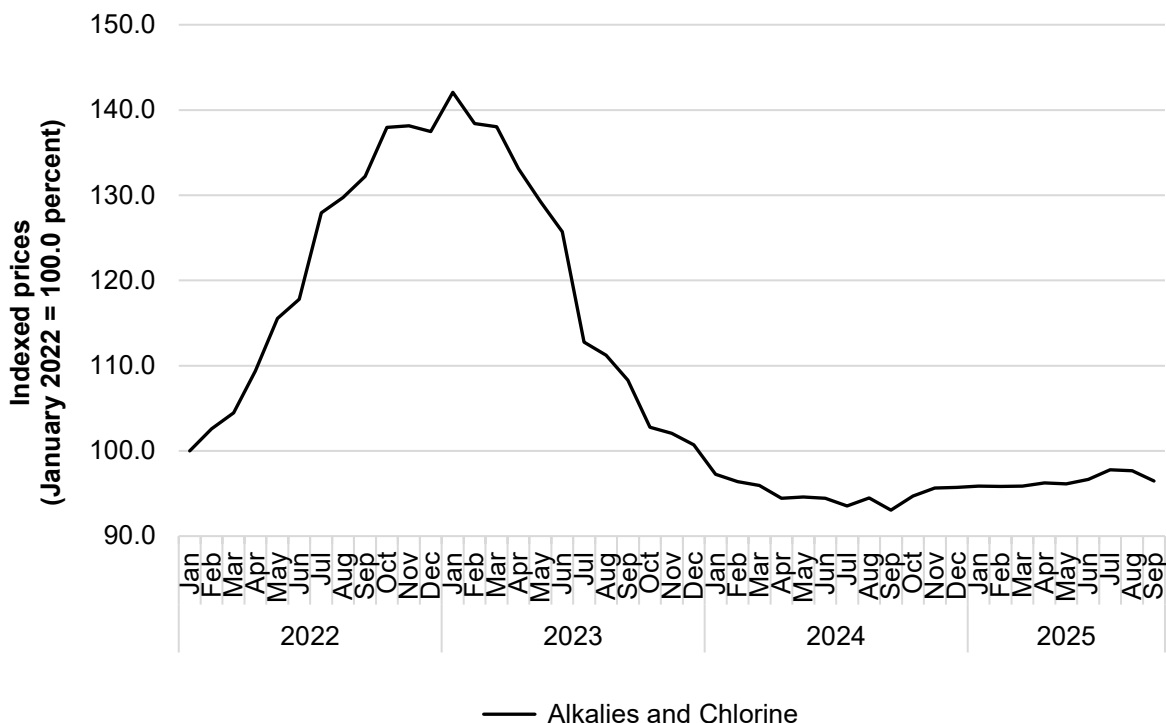
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<sup>1</sup> S&P Global Commodity Insights. Chemical Economics Handbook, Chromium Compounds, Inorganic December 2023, retrieved November 19, 2025.

<sup>2</sup> S&P Global Commodity Insights. Chemical Economics Handbook, Sodium Carbonate (Soda Ash). April 2024. Data compiled on April 15, 2024, retrieved November 19, 2025.

<sup>3</sup> U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Chemicals and Allied Products: Alkalies and Chlorine, Including Natural Sodium Carbonate and Sulfate \*\*\*, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPU061303>, retrieved November 19, 2025.

**Figure 5.1 Raw materials: Producer Price Index for Chemicals and Allied Products: Alkalies and Chlorine, Including Natural Sodium Carbonate and Sulfate, January 2022 to September 2025**



Source: U.S. Bureau of Labor Statistics, retrieved from Federal Reserve Bank of St. Louis (FRED).

**Table 5.1 Raw materials: Producer Price Index for Chemicals and Allied Products: Alkalies and Chlorine, Including Natural Sodium Carbonate and Sulfate, January 2022 to August 2025**

Index in percent, January 2022 = 100.0 percent

Month	2022	2023	2024	2025
January	100.0	142.1	97.3	95.9
February	102.6	138.4	96.4	95.8
March	104.5	138.0	95.9	95.9
April	109.4	133.1	94.4	96.2
May	115.6	129.2	94.6	96.1
June	117.8	125.7	94.4	96.7
July	127.9	112.8	93.6	97.8
August	129.7	111.2	94.5	97.7
September	132.2	108.3	93.0	96.5
October	138.0	102.8	94.7	95.9
November	138.2	102.0	95.6	95.8
December	137.5	100.7	95.7	—

Source: U.S. Bureau of Labor Statistics, retrieved from Federal Reserve Bank of St. Louis (FRED).

## Transportation costs to the U.S. market

Transportation costs for chromium trioxide shipped from subject countries to the United States averaged 6.2 percent for India \*\*\* percent for Turkey during 2024. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>4</sup>

## U.S. inland transportation costs

U.S. producer ACC typically \*\*\* transportation to its customers, while most importers reported that they typically arrange transportation to their customers. U.S. producer ACC reported that its U.S. inland transportation costs were \*\*\* percent, while importers reported costs of 3.0 to 7.0 percent.

## Pricing practices

### Pricing methods

U.S. producer ACC reported setting prices using \*\*\*, while a plurality of importers reported setting prices using transaction-by-transaction negotiations (table 5.2). U.S. importer Kobitex states it has a contract-based supply from foreign producer Sisecam and that it conducts sales at stable, negotiated prices.<sup>5</sup>

**Table 5.2 Chromium trioxide: Count of U.S. producers' and importers' reported price setting methods**

Method	U.S. producers	Importers
Transaction-by-transaction	***	3
Contract	***	1
Set price list	***	1
Other	***	2
Responding firms	1	5

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

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<sup>4</sup> The estimated transportation costs for imports from India were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on the HTS statistical reporting number 2819.10.0000. \*\*\*.

<sup>5</sup> Conference transcript, pp. 75 to 80 (Gulersen).

U.S. producer ACC reported selling most of its chromium trioxide \*\*\*, which specializes in the wood preservation market<sup>6</sup>, reported that it sold \*\*\* percent of its chromium trioxide under annual contracts, while \*\*\* reported that it sold \*\*\* percent of its chromium trioxide under short-term contracts.

**Table 5.3 Chromium trioxide: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024**

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Because of rounding, figures may not add to the totals shown.

U.S. producer ACC and most responding importers reported that typical contract provisions \*\*\*.

### Sales terms and discounts

U.S. producer ACC typically quotes prices on \*\*\* basis, while importers typically quote prices on a delivered basis. U.S. producer ACC reported that it offers \*\*\* discounts, while a plurality of importers reported that they offer no discounts, and two reported that they offer quantity discounts.

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<sup>6</sup> Conference transcript, p. 11 (DiPietro).

## Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following chromium trioxide products shipped to unrelated U.S. customers during January 2022 to September 2025. Firms that imported these products from India and Turkey for their own use were requested to provide import purchase cost data.

**Product 1**--Chromium Trioxide Flake, chemical formula  $\text{CrO}_3$  packaged in large metal cans (ranging between 240 kg and 250 kg per can).

**Product 2**--Chromium Trioxide Flake, chemical formula  $\text{CrO}_3$  packaged in 25 kg metal cans.

**Product 3**--Chromium Trioxide Flake, chemical formula  $\text{CrO}_3$  packaged in 50 kg metal cans.

**Product 4**--Chromic Acid Liquid 40%, Chemical formula  $\text{H}_2\text{CrO}_4$  in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs).

## Price data

U.S. producer ACC and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>7</sup> Pricing data reported by these firms accounted for approximately \*\*\*<sup>8</sup> percent of U.S. producers' U.S. shipments of chromium trioxide, \*\*\* percent of U.S. shipments of subject imports from India, and \*\*\* percent of U.S. shipments of subject imports from Turkey in 2024.<sup>9</sup> Price data for products 1 to 4 are presented in tables 5.4 to 5.7 and figures 5.2 to 5.5.

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<sup>7</sup> Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

<sup>8</sup> Counsel for ACC reported that \*\*\*. Email to USITC staff, September 30, 2025.

<sup>9</sup> Pricing coverage is based on U.S. shipments reported in questionnaires. Reported pricing data accounted for \*\*\* percent of commercial shipments from India and Turkey.

**Table 5.4 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Price in dollars per pound CDW, quantity in pounds CDW, margin in percent.

Period	U.S. price	U.S. quantity	India price	India quantity	India margin	Turkey price	Turkey quantity	Turkey margin
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in large metal cans (ranging between 240 kg and 250 kg per can).

**Figure 5.2 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in large metal cans (ranging between 240 kg and 250 kg per can).

**Table 5.5 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Price in dollars per pound CDW, quantity in pounds CDW, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 25 kg metal cans. No pricing product data were reported for Product 2 from India.

**Figure 5.3 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 25 kg metal cans.

**Table 5.6 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Price in dollars per pound CDW, quantity in pounds CDW, margin in percent.

Period	U.S. price	U.S. quantity	Turkey price	Turkey quantity	Turkey margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans. No pricing product data were reported for Product 3 from India.

**Figure 5.4 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans.

**Table 5.7 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

Price in dollars per pound CDW, quantity in pounds CDW, margin in percent.

Period	U.S. price	U.S. quantity
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***
2023 Q4	***	***
2024 Q1	***	***
2024 Q2	***	***
2024 Q3	***	***
2024 Q4	***	***
2025 Q1	***	***
2025 Q2	***	***
2025 Q3	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Chromic Acid Liquid 40%, Chemical formula H<sub>2</sub>CrO<sub>4</sub> in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs). No pricing product data were reported for Product 4 from India or Turkey.

**Figure 5.5 Chromium trioxide: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Chromic Acid Liquid 40%, Chemical formula  $H_2CrO_4$  in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs).

## Import purchase cost data

Two importers, \*\*\*, reported useable import purchase cost data for products 1 to 4.<sup>10</sup> Purchase cost data reported by these firms accounted for \*\*\* percent of imports from India and \*\*\* percent of imports from Turkey in 2024. \*\*\*. Landed duty-paid purchase cost data for imports from India and Turkey are presented in tables 5.8 to 5.11 and figures 5.6 to 5.9, along with U.S. producers' sales prices.<sup>11</sup>

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of importing chromium trioxide themselves.

Both responding importers reported that they incurred additional costs beyond landed duty-paid costs by importing chromium trioxide themselves rather than purchasing from a U.S. producer or U.S. importer. Of these, both importers estimated the total additional cost incurred; estimates ranged from \*\*\* percent compared to the landed duty-paid value. Firms were also asked to identify specific additional costs they incurred as a result of importing chromium trioxide. Reported costs include freight from the foreign supplier, higher working capital, storage and broker fees.

Firms were also asked to describe how these additional costs incurred by importing chromium trioxide themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. \*\*\* reported that U.S. inland transportation costs were likely cheaper than inland freights for imports, but that it was not sure since freight costs were built into the price. \*\*\* reported that it wouldn't have the costs if it were able to purchase from U.S. producer ACC.

\*\*\* reported that it compares costs of importing to the cost of purchasing from the U.S. producer and U.S. importers in determining whether to import chromium trioxide, while \*\*\* reported that it did not.

\*\*\* identified benefits from importing chromium trioxide themselves instead of purchasing from the U.S. producer or importers, including obtaining the product in the desired form, and avoiding supply risk, while \*\*\* reported that ACC does not have ample supply.

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<sup>10</sup> Revisions to the purchase cost data for Product 1 from India in its U.S. importers' questionnaire and question 1 in its Lost Sales & Lost Revenue Survey were received from \*\*\*, removing data for which it was the consignee but not the importer of record and also the quarter reported. However, the revision was not received in time for incorporation into the staff report.

<sup>11</sup> LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

Firms were also asked whether the import cost (both excluding and including additional costs) of chromium trioxide they imported are lower than the price of purchasing chromium trioxide from the U.S. producer or an importer, to which both firms reported that it was not.

**Table 5.8 Chromium trioxide: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter** Price and LDP value in dollars per pound CDW, quantity in pounds CDW, price-cost differential in percent

Period	U.S. price	U.S. quantity	India LDP unit cost	India quantity	India Price-cost differential	Turkey LDP unit cost	Turkey quantity	Turkey price-cost differential
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***
2025 Q3	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in large metal cans (ranging between 240 kg and 250 kg per can). \*\*\*.

Note: U.S. producer price data is the same as that presented in table 5.4.

**Figure 5.6 Chromium trioxide: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter**  
**U.S. price and import purchase cost of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Chromium Trioxide Flake, chemical formula  $\text{CrO}_3$  packaged in large metal cans (ranging between 240 kg and 250 kg per can).

**Table 5.9 Chromium trioxide: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter** Price and LDP value in dollars per pound CDW, quantity in pounds CDW, price-cost differential in percent

Period	U.S. price	U.S. quantity	Turkey LDP unit cost	Turkey quantity	Turkey price-cost differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans. \*\*\*.

Note: U.S. producer price data is the same as that presented in table 5.5.

**Figure 5.7 Chromium trioxide: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter U.S. price and import purchase cost of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans.

**Table 5.10 Chromium trioxide: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter** Price and LDP value in dollars per pound CDW, quantity in pounds CDW, margin and price-cost differential in percent

Period	U.S. price	U.S. quantity	India LDP unit cost	India quantity	India price-cost differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***
2025 Q3	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Chromium Trioxide Flake, chemical formula CrO3 packaged in 50 kg metal cans. \*\*\*.

Note: U.S. producer price data is the same as that presented in table 5.6.

**Figure 5.8 Chromium trioxide: U.S. producer prices and import purchase costs, and quantities, of product 3, by quarter U.S. price and import purchase cost of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Chromium Trioxide Flake, chemical formula CrO<sub>3</sub> packaged in 50 kg metal cans.

**Table 5.11 Chromium trioxide: Import landed duty-paid purchase costs and domestic prices, quantities of product 4, and price-cost differentials, by quarter** Price and LDP value in dollars per pound CDW, quantity in pounds CDW

Period	U.S. price	U.S. quantity
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***
2023 Q4	***	***
2024 Q1	***	***
2024 Q2	***	***
2024 Q3	***	***
2024 Q4	***	***
2025 Q1	***	***
2025 Q2	***	***
2025 Q3	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Chromic Acid Liquid 40%, Chemical formula  $H_2CrO_4$  in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs). \*\*\*.

Note: U.S. producer price data is the same as that presented in table 5.7.

**Figure 5.9 Chromium trioxide: U.S. producer prices and import purchase costs, and quantities, of product 4, by quarter U.S. price and import purchase cost of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Chromic Acid Liquid 40%, Chemical formula  $H_2CrO_4$  in HDPE IBC totes (ranging between 1,000 kgs and 1,600 kgs).

## Price and purchase cost trends

In general, prices and purchase costs increased during January 2022 to September 2025. Table 5.12 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from \*\*\* percent during January 2022 to September 2025 while import price increases ranged from \*\*\* percent.

**Table 5.12 Chromium trioxide: Summary of price and cost data, by product and source**

Volume in CDW, price and cost in dollars per CDW

Product	Source	Number of quarters	Volume of shipments	Low price/cost	High price/cost	First quarter price/cost	Last quarter price/cost	Percent change in price/cost over period
Product 1	United States	15	***	***	***	***	***	***
Product 1	India price	11	***	***	***	***	***	***
Product 1	India cost	14	***	***	***	***	***	***
Product 1	Turkey price	15	***	***	***	***	***	***
Product 1	Turkey cost	4	***	***	***	***	***	***
Product 2	United States	15	***	***	***	***	***	***
Product 2	India price	—	***	***	***	***	***	***
Product 2	India cost	—	***	***	***	***	***	***
Product 2	Turkey price	15	***	***	***	***	***	***
Product 2	Turkey cost	3	***	***	***	***	***	***
Product 3	United States	15	***	***	***	***	***	***
Product 3	India price	—	***	***	***	***	***	***
Product 3	India cost	2	***	***	***	***	***	***
Product 3	Turkey price	15	***	***	***	***	***	***
Product 3	Turkey cost	—	***	***	***	***	***	***
Product 4	United States	15	***	***	***	***	***	***
Product 4	India price	—	***	***	***	***	***	***
Product 4	India cost	—	***	***	***	***	***	***
Product 4	Turkey price	—	***	***	***	***	***	***
Product 4	Turkey cost	—	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percentage change from the first quarter in which data were available in 2022 to the last quarter in which data were available in 2025.

**Table 5.13 Chromium trioxide: Indexed U.S. producer prices, by quarter**

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4
2022 Q1	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***
2025 Q1	***	***	***	***
2025 Q2	***	***	***	***
2025 Q3	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure 5.10 Chromium trioxide: Indexed U.S. producer prices, by quarter**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

**Table 5.14 Chromium trioxide: Indexed U.S. importer prices, and purchase costs, by quarter**

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1 price	Product 2 price	Product 3 price	Product 1 cost
2022 Q1	100.0	100.0	100.0	100.0
2022 Q2	***	***	***	***
2022 Q3	***	***	***	***
2022 Q4	***	***	***	***
2023 Q1	***	***	***	***
2023 Q2	***	***	***	***
2023 Q3	***	***	***	***
2023 Q4	***	***	***	***
2024 Q1	***	***	***	***
2024 Q2	***	***	***	***
2024 Q3	***	***	***	***
2024 Q4	***	***	***	***
2025 Q1	***	***	***	***
2025 Q2	***	***	***	***
2025 Q3	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Figure 5.11 Chromium trioxide: Indexed U.S. importer prices, by quarter**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires.

## Price and purchase cost comparisons

### Price comparisons

As shown in table 5.16, prices for product imported from India were below those for U.S.-produced product in 9 of 11 instances (\*\* CDW); margins of underselling ranged from \*\* percent. In the remaining 2 instances (\*\* CDW), prices for product from India were between \*\* percent above prices for the domestic product. Prices for product imported from Turkey were below those for U.S.-produced product in 42 of 45 instances (\*\* CDW); margins of underselling ranged from \*\* percent. In the remaining 3 instances (\*\* CDW), prices for product from Turkey were between \*\* percent above prices for the domestic product.

**Table 5.15 Chromium trioxide: Instances of underselling and overselling and the range and average of margins, by product** Quantity in CDW; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	24	**	**	**	**
Product 2	Underselling	15	**	**	**	**
Product 3	Underselling	12	**	**	**	**
Product 4	Underselling	—	**	**	**	**
Total	Underselling	51	**	**	**	**
Product 1	Overselling	2	**	**	**	**
Product 2	Overselling	—	**	**	**	**
Product 3	Overselling	3	**	**	**	**
Product 4	Overselling	—	**	**	**	**
Total	Overselling	5	**	**	**	**

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

**Table 5.16 Chromium trioxide: Instances of underselling and overselling and the range and average of margins, by source** Quantity in CDW; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
India	Underselling	9	***	***	***	***
Turkey	Underselling	42	***	***	***	***
Total	Underselling	51	***	***	***	***
India	Overselling	2	***	***	***	***
Turkey	Overselling	3	***	***	***	***
Total	Overselling	5	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

**Table 5.17 Chromium trioxide: Instances of underselling and overselling and the range and average of margins, by year**

Quantity in CDW; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	11	***	***	***	***
2023	Underselling	13	***	***	***	***
2024	Underselling	15	***	***	***	***
January through September 2025	Underselling	12	***	***	***	***
Total, all years	Underselling	51	***	***	***	***
2022	Overselling	4	***	***	***	***
2023	Overselling	1	***	***	***	***
2024	Overselling	—	***	***	***	***
January through September 2025	Overselling	—	***	***	***	***
Total, all years	Overselling	5	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

## Price-cost comparisons

As shown in table 5.19, landed duty-paid costs for chromium trioxide imported from India were below the sales price for U.S.-produced product in 14 of 16 instances (\*\*\*) CDW); price-cost differentials ranged from \*\*\* percent. In the remaining 2 instances (\*\*\*) CDW), landed duty-paid costs for chromium trioxide from India were between \*\*\* percent above sales prices for the domestic product. Landed duty-paid costs for chromium trioxide imported from Turkey were below the sales price for U.S.-produced product in all 7 instances (\*\*\*) CDW); price-cost differentials ranged from \*\*\* percent.

**Table 5.18 Chromium trioxide: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product** Quantity in CDW; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	16	***	***	***	***
Product 2	Lower than U.S. price	3	***	***	***	***
Product 3	Lower than U.S. price	2	***	***	***	***
Product 4	Lower than U.S. price	—	***	***	***	***
Total	Lower than U.S. price	21	***	***	***	***
Product 1	Higher than U.S. price	2	***	***	***	***
Product 2	Higher than U.S. price	—	***	***	***	***
Product 3	Higher than U.S. price	—	***	***	***	***
Product 4	Higher than U.S. price	—	***	***	***	***
Total	Higher than U.S. price	2	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

**Table 5.19 Chromium trioxide: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by source** Quantity in CDW; price-cost differential in

Source	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
India	Lower than U.S. price	14	***	***	***	***
Turkey	Lower than U.S. price	7	***	***	***	***
Total	Lower than U.S. price	21	***	***	***	***
India	Higher than U.S. price	2	***	***	***	***
Turkey	Higher than U.S. price	—	***	***	***	***
Total	Higher than U.S. price	2	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

**Table 5.20 Chromium trioxide: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by year**

Quantity in CDW; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2022	Underselling	3	***	***	***	***
2023	Underselling	5	***	***	***	***
2024	Underselling	8	***	***	***	***
January through September 2025	Underselling	5	***	***	***	***
Total, all years	Underselling	21	***	***	***	***
2022	Overselling	2	***	***	***	***
2023	Overselling	—	***	***	***	***
2024	Overselling	—	***	***	***	***
January through September 2025	Overselling	—	***	***	***	***
Total, all years	Overselling	2	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

## Lost sales and lost revenue

The Commission requested that U.S. producers of chromium trioxide report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of chromium trioxide from India during January 2022 to September 2025. U.S. producer ACC reported that it had to reduce prices and roll back announced price increases, and that it had lost sales. U.S. producer ACC submitted lost sales and lost revenue allegations. Responding U.S. producer ACC identified five firms with which it lost sales or revenue (four consisting of lost sales allegations and one consisting of lost revenue allegations). Allegations occurred during 2022 through 2025, and were for product imported from both India and Turkey. ACC reported that \*\*\*.

Staff contacted five purchasers and received responses from four purchasers. Responding purchasers reported purchasing and importing \*\*\* pounds CDW of chromium trioxide during January 2022 to September 2025 (table 5.21).

During 2024, responding purchasers purchased \*\*\* percent from U.S. producer ACC, \*\*\* percent from India, \*\*\* percent from Turkey, and \*\*\* percent from nonsubject sources. Of the five responding purchasers, two reported that, since 2022, they had purchased imported chromium trioxide from India and/or Turkey instead of U.S.-produced product. One of these purchasers \*\*\* reported that subject import prices were lower than U.S.-produced product, and none of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Purchasers identified product packaging and refusal to supply or provide price quotes as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the five responding purchasers, none reported that U.S. producers had reduced prices in order to compete with lower-priced imports from India and/or Turkey and one reported that they did not know.

**Table 5.21 Chromium trioxide: Purchasers' reported purchases and imports, by firm and source**

Quantity in 1,000 pounds CDW, share in percent

<b>Purchaser</b>	<b>Domestic quantity</b>	<b>Subject quantity</b>	<b>All other quantity</b>	<b>Change in domestic share</b>	<b>Change in subject country share</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

**Table 5.23 Chromium trioxide: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Quantity in 1,000 pounds CDW

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 2; No: 1	Yes: 1; No: 1	Yes: 0; No: 2	***	NA

Source: Compiled from data submitted in response to Commission questionnaires.



## Part 6: Financial experience of the U.S. producer

### Background<sup>1</sup>

The petitioner, American Chrome & Chemicals (“ACC”), is the sole U.S. producer of in-scope chromium trioxide. ACC reported financial data for a fiscal year ending December 31<sup>st</sup> and on the basis of IFRS.<sup>2</sup>

Net sales are composed of commercial sales and transfers. During the period examined, January 1, 2022, through September 30, 2025, commercial sales represented \*\*\* percent of total net sales quantity and transfers represented the remaining \*\*\* percent.<sup>3</sup>

Table 6.1 presents data on the U.S. producer’s operations in relation to chromium trioxide, while table 6.2 presents corresponding changes in AUVs.

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<sup>1</sup> The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles (“GAAP”), international financial reporting standards (“IFRS”), fiscal year (“FY”), net sales (“NS”), cost of goods sold (“COGS”), selling, general, and administrative expenses (“SG&A expenses”), average unit values (“AUVs”), research and development expenses (“R&D expenses”), and return on assets (“ROA”).

<sup>2</sup> The trade and financial sections reconciled \*\*\*. \*\*\*. U.S. Producer’s questionnaire response, section 2a; Petitioner’s postconference brief, Exh. 1, Response to Staff Questions, p. 63.

<sup>3</sup> \*\*\*.

**Table 6.1 Chromium trioxide: U.S. producer ACC's results of operations, by item and period**

Quantity in 1,000 pounds CDW; value in 1,000 dollars; ratios in percent; interim period is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table 6.1 (Continued) Chromium trioxide: U.S. producer ACC’s results of operations, by item and period**

Shares in percent; unit values in dollars per pound CDW; count in number of firms reporting; interim period is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials	Share	***	***	***	***	***
COGS: Direct labor	Share	***	***	***	***	***
COGS: Other factory	Share	***	***	***	***	***
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	1	1	1	1	1

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Share represents share of COGS. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table 6.2 Chromium trioxide: Changes in AUVs between comparison periods**

Changes in percent; interim period is January through September

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024-25
Total net sales	▲***	▲***	▲***	▼***
COGS: Raw materials	▲***	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***

Table continued.

**Table 6.2 (Continued) Chromium trioxide: Changes in AUVs between comparison periods**

Changes in dollars per pound CDW; interim period is January through September

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024-25
Total net sales	▲***	▲***	▲***	▼***
COGS: Raw materials	▲***	▲***	▲***	▲***
COGS: Direct labor	▲***	▲***	▲***	▼***
COGS: Other factory	▲***	▲***	▲***	▼***
COGS: Total	▲***	▲***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▼***	▲***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▼***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

## Net sales

As shown in table 6.1, both the quantity and value of the industry's total net sales consistently decreased between 2022 and 2024, and the quantity was slightly higher while the value was lower in interim 2025 compared with the same period in 2024.<sup>4</sup>

The industry's total net sales AUVs decreased from \$\*\*\* per pound in 2022 to \$\*\*\* per pound in 2024. The industry's net sales AUVs were lower in interim 2025, at \$\*\*\* per pound, than in interim 2024, at \$\*\*\* per pound.

## Cost of goods sold and gross profit or loss

Raw material costs, direct labor, and other factory costs accounted for \*\*\*, \*\*\*, and \*\*\* percent of COGS, respectively, in 2024. Total raw material costs consistently decreased from \$\*\*\* in 2022 to \$\*\*\* in 2024, and were higher in interim 2025, at \$\*\*\* than in interim 2024, at \$\*\*\*. On a per-pound basis, raw material costs increased from \$\*\*\* in 2022 to \$\*\*\* in 2024 and were higher in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*.<sup>5</sup> Chromite ore, the major raw material, had the largest share of value of raw materials in 2024, as shown in table 6.3.<sup>6 7 8 9</sup>

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<sup>4</sup> Net sales quantity decreased by \*\*\* percent and net sales value decreased by \*\*\* percent between 2022 and 2024. Net sales quantity was \*\*\* percent higher in interim 2025 compared with interim 2024. In the same interim periods, the net sales value was \*\*\* percent lower.

<sup>5</sup> ACC stated that its raw material of chromite ore was sourced out of South Africa, and its soda ash was sourced out of Wyoming. Conference transcript, p. 32 (Hansley).

<sup>6</sup> Conference transcript, p. 32 (Hansley).

<sup>7</sup> \*\*\*. Petitioner's postconference brief, Exh. 1, Response to Staff Questions, p. 58; Email from \*\*\*, December 15, 2025.

<sup>8</sup> Raw materials arsenic and copper oxide forms are used to manufacture chromated copper arsenate (CCA), a wood preservation product. They are not raw materials used in the production of the subject product, chromium trioxide; however, they are added to chromium trioxide later for use in downstream wood preservation market applications. Conference transcript, p. 11 (Dipietro); p. 17 (Hansley); pp. 66 to 67 (Schoen); p. 94 (Schoen, Jacobson). As there are no arsenic and no copper oxide forms used to manufacture chromium trioxide, they are not ACC's raw material costs and are not presented in tables 6.1 and 6.3. Email from \*\*\*, December 15, 2025.

<sup>9</sup> \*\*\*.

The industry's cost of direct labor increased from \$\*\*\* in 2022 to \$\*\*\* in 2024 and was about the same in interim 2025 and interim 2024 (\$\*\*\*).<sup>10</sup> The average unit cost of direct labor increased from \$\*\*\* per pound in 2022 to \$\*\*\* per pound in 2024 and was the same in interim 2025 and interim 2024 (\$\*\*\* per pound).

Other factory costs increased overall from \$\*\*\* in 2022 to \$\*\*\* in 2024 and were lower in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*.<sup>11</sup> On a per-pound basis, other factory costs consistently increased from \$\*\*\* per pound in 2022 to \$\*\*\* per pound in 2024. Other factory costs were lower on a per-pound basis in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*.<sup>12 13</sup>

Total COGS decreased overall by \*\*\* percent, from \$\*\*\* in 2022 to \$\*\*\* in 2024 and was lower in interim 2025, at \$\*\*\*, than in interim 2024 at \$\*\*\*. Gross profit consistently decreased from \$\*\*\* in 2022 to \$\*\*\* in 2024 and was higher in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*. Total COGS as a ratio to net sales value consistently increased from \*\*\* percent in 2022 to \*\*\* percent in 2024 and was lower in interim 2025, at \*\*\* percent, than in interim 2024, at \*\*\* percent. Gross profit as a ratio to net sales consistently decreased from \*\*\* percent to \*\*\* percent from 2022 to 2024 and was higher in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent).

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<sup>10</sup> \*\*\*. Email from \*\*\*, December 15, 2025.

<sup>11</sup> ACC reported a nonrecurring expense of \$\*\*\* of other factory costs related to \*\*\* in 2022. U.S. Producer's questionnaire response, section 3.10.

<sup>12</sup> \*\*\*. U.S. Producer's questionnaire response, section 2.2; Email from \*\*\*, December 15, 2025.

<sup>13</sup> \*\*\*. Email from \*\*\*, December 15, 2025.

**Table 6.3 Chromium trioxide: U.S. producer ACC's raw material costs in 2024**

Value in 1,000 dollars; unit values in dollars per pound CDW; share of value in percent

Item	Value	Unit value	Share of value
Chromite ore	***	***	***
Soda ash	***	***	***
Other material inputs	***	***	***
All raw materials	***	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

### **SG&A expenses and operating income or loss**

SG&A expenses increased overall from \$\*\*\* in 2022 to \$\*\*\* in 2024 and were higher in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*.<sup>14</sup> The SG&A expense ratio (SG&A expenses as a share of sales) increased from \*\*\* percent in 2022 to \*\*\* percent in 2024 and were higher in interim 2025, at \*\*\* percent, than in interim 2024, at \*\*\* percent.

Operating income consistently decreased from \$\*\*\* in 2022 to a \$\*\*\* in 2024 and was lower in interim 2025 at \*\*\* than interim 2024 at \*\*\*. The operating margin (operating income as a ratio to net sales) consistently decreased from \*\*\* percent in 2022 to \*\*\* percent in 2024 and was lower in interim 2025 (\*\*\* percent) than in interim 2024 (\*\*\* percent). Table 6.3 (Continued) #Abbrproduct: U.S. producers' sales, costs/expenses, and profitability, by firm and period.

### **All other expenses and net income or loss**

Classified below the total market operating income level are interest expense, other expenses, and other income, which are listed in table 6.1.<sup>15</sup> Interest expense decreased irregularly from \$\*\*\* in 2022 to \$\*\*\* in 2024 and was the same in interim 2025 and interim 2024 at \$\*\*\*. All other expenses decreased irregularly from \$\*\*\* in 2022 to \$\*\*\* in 2024 and were lower in interim 2025, at \$\*\*\*, than in interim 2024, at \$\*\*\*.

<sup>14</sup> ACC noted that SG&A costs \*\*\*. Email from \*\*\*, December 15, 2025.

<sup>15</sup> \*\*\*.

Net income decreased consistently from \$\*\*\* in 2022 to \*\*\* in 2024 and was lower in interim 2025 at \*\*\* than in interim 2024 at \*\*\*.

## Variance analysis

A variance analysis for chromium trioxide operations of the U.S. producer is presented in table 6.4.<sup>16</sup> The information for this variance analysis is derived from table 6.1.

The variance analysis in table 6.4 shows that the decrease in operating income between 2022 and 2024 was primarily attributable to unfavorable cost/expense and volume variances despite a smaller favorable price variance. Lower operating income in interim 2025 compared with interim 2024 is primarily attributable to unfavorable price and volume variances that outweighed a smaller favorable cost/expense variance.

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<sup>16</sup> The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

**Table 6.4 Chromium trioxide: Variance analysis on the operations of U.S. producer American Chrome & Chemicals between comparison periods**

Value in 1,000 dollars; interim period is January through September

Item	2022 to 2024	2022 to 2023	2023 to 2024	Interim 2024-25
Net sales price variance	***	***	***	***
Net sales volume variance	***	***	***	***
Total net sales variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost/expense variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

## Capital expenditures, research and development expenses, assets, and return on assets

Table 6.5 presents ACC's total market capital expenditures, R&D expenses, assets, and return on assets, and the firm's narrative explanations of the nature, focus, and significance of the items are presented in table 6.6.<sup>17</sup>

The industry's capital expenditures decreased overall between 2022 and 2024 and were higher in interim 2025 than interim 2024. R&D expenses \*\*\* from 2022 to interim 2025. As for assets in the industry, they increased irregularly from 2022 to 2024 and the corresponding ROA \*\*\* in \*\*\* three yearly periods.

<sup>17</sup> The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

**Table 6.5 Chromium trioxide: U.S. producer ACC’s capital expenditures, R&D expenses, total net assets, and ROA, by item and period**

Value in 1,000 dollars; interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025
Capital expenditures	***	***	***	***	***
R&D expenses	***	***	***	***	***
Total net assets	***	***	***	***	***
Return on assets	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: NA indicates not applicable. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table 6.6 Chromium trioxide: U.S. producer ACC's narrative descriptions of its capital expenditures, R&D expenses, and total net assets**

Item	Narrative on capital expenditures, R&D expenses and total net assets
Capital expenditures	***
R&D expenses	***
Total net assets	***

Source: Compiled from data submitted in response to Commission questionnaires.

## Capital and investment

The Commission requested the U.S. producer of chromium trioxide to describe any actual or potential negative effects of imports of chromium trioxide from China, Germany, India, and Saudi Arabia on the firm’s growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.7 presents the impact in each category and table 6.8 provides the U.S. producer’s narrative responses.

**Table 6.7 Chromium trioxide: U.S. producer ACC’s count indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect**

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Table 6.8 Chromium trioxide: U.S. producer ACC’s narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by effect**

Item	Narrative on impact of imports
***	***
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.



## Part 7: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors<sup>1--</sup>

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,
- (V) inventories of the subject merchandise,

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<sup>1</sup> Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).<sup>2</sup>

Information on the nature of the alleged subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

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<sup>2</sup> Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

## Subject countries

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export chromium trioxide from India and Turkey.<sup>3</sup> Usable responses to the Commission's questionnaire were received from two firms in total.

Table 7.1 presents the number of producers/exporters that responded to the Commission's questionnaire, their estimated share of total production of chromium trioxide, and their exports to the United States as a share of U.S. imports, by each subject country in 2024.

**Table 7.1 Chromium trioxide: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports, by subject foreign industry, 2024**

Subject foreign industry	Number of responding firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
India	1	***	*** <sup>4</sup>
Turkey	1	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: "Approximate share of production" reflects the responding firms' estimates of their production as a share of total country production of chromium trioxide in 2024. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested. For countries in which more than one firm responded, the average denominator for reasonably reported estimates is used in the share presented. Approximate shares are rounded to the nearest whole number.

<sup>3</sup> These firms were identified through a review of information submitted in the petition and presented in third-party sources.

<sup>4</sup> Staff revised import data to accommodate double counting in the data set.

Table 7.2 presents information on the chromium trioxide operations of the responding producers in India and Turkey (or the responding subject producers, by firm) and table 7.2 presents summary information on responding resellers of subject chromium trioxide.

**Table 7.2 Chromium trioxide: Summary data on responding subject foreign producers in 2024, by firm**

Subject foreign industry and producer name	Production (1,000 pounds CDW)	Share of reported production (percent)	Exports to the United States (1,000 pounds CDW)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds CDW)	Share of firm's total shipments exported to the United States (percent)
India: Vishnu	***	***	***	***	***	***
Turkey: Sise	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 7.3 presents events in the subject countries' industries since January 1, 2022.

**Table 7.3 Chromium trioxide: Important industry events since 2022**

Item	Firm	Event
Prolonged slowdown	Elementis	Early 2022: Unplanned maintenance at the Castle Hayne plant (North Carolina), then owned by Elementis Chromium, reduced the production of chromium products.
Acquisition	Yildirim	January 31, 2023: Yildirim (Turkey) completed its acquisition of Elementis Chromium. Renamed the operation American Chrome and Chemicals (ACC).
Acquisition	CoreX Holdings	2024: Yildirim restructured, and ACC was placed under CoreX Holding (Turkey/Netherlands), a separate, newly formed company.
Prolonged shutdown	ACC	2025: ACC's production at the Castle Hayne plant was impacted by an unspecified shutdown.

Source: Elementis Annual Report and Accounts 2022, pp. 85, 212, [https://www.elementis.com/fileadmin/elementis/Investor\\_Relations/Investor\\_Information/Results\\_Reports\\_Presentations/Annual\\_Reports/Elementis\\_Annual\\_Report\\_2022.pdf](https://www.elementis.com/fileadmin/elementis/Investor_Relations/Investor_Information/Results_Reports_Presentations/Annual_Reports/Elementis_Annual_Report_2022.pdf); ACC website, "About Us," accessed December 5, 2025, <https://americanchromechemicals.com/about-us>; Yildirim Group, Annual Report 2023, p. 23, <https://www.yildirimgroup.com/media/Annual/Annual-Report-2023.pdf>; CoreX Annual Report 2024, pp. 8, 15, 93, 94, [https://www.corexholding.com/media/Corex\\_Annual%20Report\\_2024\\*\\*\\*.pdf](https://www.corexholding.com/media/Corex_Annual%20Report_2024***.pdf); Conference transcript, pp. 72 (Roche) and 125 (Jacobson).

## Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of chromium trioxide since 2022. \*\*\* producers indicated in their questionnaires that they had experienced such changes.

## Installed and practical overall capacity

Table 7.4 presents data on subject producers' installed capacity, practical overall capacity, and practical chromium trioxide capacity and production on the same equipment. Installed overall capacity was constant at \*\*\* pounds from 2022 to 2024, and was also constant at \*\*\* pounds in interims 2024 and 2025. Practical overall and practical chromium trioxide capacity were constant at \*\*\* pounds from 2022 to 2024, and \*\*\* pounds in interims 2024 and 2025.

**Table 7.4 Chromium trioxide: Subject producer's installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 pounds CDW; utilization in percent; interim period is January through September

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical chromium trioxide	Capacity	***	***	***	***	***
Practical chromium trioxide	Production	***	***	***	***	***
Practical chromium trioxide	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

## Constraints on capacity

Tables 7.5 presents subject producer's reported production and capacity constraints since January 1, 2022.

**Table 7.5 Chromium trioxide: Producer's subject foreign industries reported constraints to practical overall capacity since January 1, 2022 by type of subject foreign industry, firm, and type of constraint**

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Storage capacity	***
Other constraints	***
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

## Operations on chromium trioxide

### Aggregate chromium trioxide operations in the subject countries

Table 7.6 presents information on the chromium trioxide operations of the responding foreign producers/exporters (aggregate data for all subject foreign industries). Foreign producers'/exporters production decreased \*\*\* percent from 2022 to 2024 and was \*\*\* higher in interim 2025 than in interim 2024. Production was projected to be \*\*\* percent lower from 2024 to 2025 and is projected to be \*\*\* percent higher from 2025 to 2026. Exports from India to the United States decreased by \*\*\* percent from 2022 to 2024 and were projected to be \*\*\* percent higher in 2025 than in 2024. Exports from Turkey to the United States increased \*\*\* percent from 2022 to 2024 and were projected to be \*\*\* percent lower in 2025 than in 2024, and \*\*\* higher in 2026 than in 2025.

**Table 7.6 Chromium trioxide: Data on subject foreign industries, by item and period**

Quantity in 1,000 pounds CDW; Interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

**Table 7.6 (Continued) Chromium trioxide: Data on subject foreign industries, by item and period**

Shares and ratios in percent; interim period is January through September

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

## Practical chromium trioxide capacity and production by subject foreign industry

Table 7.7 presents information on subject producers' production, capacity, and capacity utilization by subject country.

**Table 7.7 Chromium trioxide: Subject producers' output: practical capacity, by source and period**

### Practical capacity

Capacity in 1,000 pounds CDW; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

**Table 7.7 (Continued) Chromium trioxide: Subject producers' output: Production, by source and period**

### Production

Production in 1,000 pounds CDW; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

**Table 7.7 (Continued) Chromium trioxide: Subject producers' output: capacity utilization, by source and period**

### Capacity utilization

Capacity utilization in percent; interim is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Note: Capacity utilization ratio represents the ratio of the subject producer's production to its production capacity.

**Table 7.7 (Continued) Chromium trioxide: Subject producers' output: Share of production, by source and period**

**Share of production**

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

**Chromium trioxide exports, by subject country**

Table 7.8 presents information on subject producers' (and resellers) exports of chromium trioxide by subject country.

**Table 7.8 Chromium trioxide: Subject producers' (and resellers') exports: Exports to the United States, by source and period**

**Exports to the United States**

Quantity in 1,000 pounds CDW; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Table 7.8 (Continued) Chromium trioxide: Subject producers' (and resellers') exports: Share of total shipments exported to the United States, by source and period**

**Share of total shipments exported to the United States**

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Table 7.8 (Continued) Chromium trioxide: Subject producers' exports: Share of total shipments exported to all destinations, by source and period**

**Share of total shipments exported**

Share in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Chromium trioxide inventories, by subject foreign industry**

Table 7.9 presents information on ending inventory of the responding producers by subject foreign country.

**Table 7.9 Chromium trioxide: Subject foreign industries' ending inventories: Ending inventories, by source and period**

Quantity in 1,000 pounds CDW; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

**Table 7.9 (Continued) Chromium trioxide: Subject foreign industries' ending inventories: Ratio of ending inventories to total shipments, by source and period**

Ratio in percent; interim period is January through September

Subject foreign industry	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
India	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

## Exports

Table 7.10 presents Global Trade Atlas (“GTA”) data for exports of chromium trioxide from subject countries to the United States and to all destination markets.

**Table 7.10 Chromium trioxide: Global exports from subject exporters: Exports to the United States, by exporter and period**

Quantity in 1,000 pounds CDW

Exporter	Measure	2022	2023	2024
India	Quantity	3,333	2,183	1,720
Turkey	Quantity	***	***	***
Subject exporters	Quantity	***	***	***

Table continued.

**Table 7.10 (Continued) Chromium trioxide: Global exports from subject exporters: Exports to all destination markets, by exporter and period**

Quantity in 1,000 pounds CDW

Exporter	Measure	2022	2023	2024
India	Quantity	11,299	8,733	11,556
Turkey	Quantity	***	***	***
Subject exporters	Quantity	***	***	***

**Table 7.10 (Continued) Chromium trioxide: Global exports from subject exporters: Share of exports exported to the United States, by exporter and period**

Shares in percent

Exporter	Measure	2022	2023	2024
India	Share	29.5	25.0	14.9
Turkey	Share	***	***	***
Subject exporters	Share	***	***	***

Source: Compiled from Official exports statistics under HS subheading 2819.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed November 21, 2025 adjusted to add in U.S. imports from Turkey (constructed exports from Turkey to the U.S.) using responses to Commission questionnaires.

## U.S. inventories of imported merchandise

Table 7.11 presents data on U.S. importers' reported inventories of Chromium trioxide.

**Table 7.11 Chromium trioxide: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in 1,000 pounds CDW; Ratio in percent; Interim period is January through September

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Turkey	***	***	***	***	***
Ratio to imports	Turkey	***	***	***	***	***
Ratio to U.S. shipments of imports	Turkey	***	***	***	***	***
Ratio to total shipments of imports	Turkey	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of chromium trioxide from India and Turkey after September 30, 2025. Their reported data are presented in table 7.12.

**Table 7.12 Chromium trioxide: U.S. importers' arranged imports, by source and period**

Quantity in 1,000 pounds CDW

Source	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Total
India	***	***	***	***	***
Turkey	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

## Third-country trade actions

Based on available information, chromium trioxide from India and Turkey have not been subject to other antidumping or countervailing duty investigations outside the United States.

## Information on nonsubject countries

Table 7.13 presents global production capacity and consumption for the global chromium trioxide industry in 2018 and 2023.<sup>5</sup> Global production capacity of chromium trioxide was \*\*\* metric tons in 2023, reflecting an \*\*\* percent \*\*\* over 2018. This \*\*\* was predominantly due to \*\*\* in production capacity in \*\*\*, which \*\*\* to \*\*\* metric tons in 2023 from \*\*\* metric tons in 2018. Global consumption of chromium trioxide totaled \*\*\* metric tons in 2023, driven by high demand in \*\*\*, which accounted for \*\*\* percent of total global consumption.<sup>6</sup> Global consumption is expected to \*\*\* for 2023–28, as indicated in table 7.13.

The European Union (EU) continues to regulate the use of chromium trioxide based on health and environmental concerns, with the potential for new restrictions under a current proposal.<sup>7</sup> Under the bloc's Registration, Evaluation and Authorization of Chemicals (REACH) regulation, use of chromium trioxide has required authorization from the European Chemicals Agency (ECHA) since 2013. In September 2023, the European Commission initiated procedures to further regulate chromium trioxide in the EU by restricting authorized use of CrO<sub>3</sub> under REACH. A decision on the proposal is expected in 2026 or later.

Global export data for HS 2819.10, a subheading that provides exclusively for chromium trioxide,<sup>8</sup> indicate that certain nonsubject countries have a significant role in global chromium trioxide trade (table 7.14). In 2024, Kazakhstan (20 million pounds) was the second-largest global exporter, followed by China (14 million pounds) and South Africa (12 million pounds). Global exports of chromium trioxide (by quantity) from China increased by 84.7 percent over the period of investigation, compared to a 50.1 percent decrease for Kazakhstan and 13.0 percent decrease for South Africa.

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<sup>5</sup> Lenzer et al., Chromium Compounds, Inorganic, S&P Global, Chemical Economics Handbook, December 2023, pp. 13–14, <https://connect.spglobal.com/chemical/markets-reports-analysis/research/chemical-economics-handbook>

<sup>6</sup> The vast majority (\*\*\* percent in 2023) of \*\*\* domestic consumption of chromium trioxide is used in metal plating. Lenzer et al., Chromium Compounds, Inorganic, S&P Global, Chemical Economics Handbook, December 2023, p. 187, <https://connect.spglobal.com/chemical/markets-reports-analysis/research/chemical-economics-handbook>

<sup>7</sup> ECHA, “ECHA to Prepare Restriction Proposal on Chromium (VI) Substances,” October 11, 2023, <https://echa.europa.eu/-/echa-to-prepare-restriction-proposal-on-chromium-vi-substances>; ECHA, “ECHA Proposes Restrictions on Chromium(VI) Substances to Protect Health,” April 29, 2025, <https://echa.europa.eu/-/echa-proposes-restrictions-on-chromium-vi-substances-to-protect-health>.

<sup>8</sup> USITC, HTS Revision 31, Publication 5688, November 2025, p. 28.11. Chromium trioxide is also commonly referred to as chromic acid anhydride or chromium (VI) oxide. Chromium trioxide is wrongly referred to as chromic acid. World Customs Organization (WCO), Harmonized Commodity Description and Coding System: Explanatory Notes, vol. 1, 5th edition (2012), p. 28.19 CAS Common Chemistry, “Chromium trioxide,” accessed November 21, 2025, [https://commonchemistry.cas.org/detail?cas\\_rn=1333-82-0](https://commonchemistry.cas.org/detail?cas_rn=1333-82-0).

**Table 7.13 Chromium trioxide: Global capacity and consumption, 2018 and 2023**

1,000 metric tons; EMEA = Europe, Middle East, and Africa

Country/Region	Capacity 2018	Capacity 2023	Consumption 2018	Consumption 2023
United States	***	***	***	***
Canada	***	***	***	***
Mexico	***	***	***	***
Total North America	***	***	***	***
Central and South America	***	***	***	***
Western Europe	***	***	***	***
Central and Eastern Europe	***	***	***	***
Eurasia	***	***	***	***
Middle East	***	***	***	***
Africa	***	***	***	***
Total EMEA	***	***	***	***
Mainland China	***	***	***	***
Japan	***	***	***	***
"Other Northeast Asia"	***	***	***	***
South Asia	***	***	***	***
Southeast Asia	***	***	***	***
Oceania	***	***	***	***
Total Asia-Pacific	***	***	***	***
Total	***	***	***	***

Source: Lenzer et al., Chromium Compounds, Inorganic, S&P Global, Chemical Economics Handbook, December 2023, pp. 13–14, <https://connect.spglobal.com/chemical/markets-reports-analysis/research/chemical-economics-handbook>.

**Table 7.14 Chromium trioxide: Global exports, by reporting country and by period**

Quantity in 1,000 pounds; value in 1,000 dollars

Exporting country	Measure	2022	2023	2024
United States	Quantity	***	***	***
India	Quantity	11,299	8,733	11,556
Turkey	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Kazakhstan	Quantity	40,445	33,266	20,177
China	Quantity	7,719	9,358	14,257
South Africa	Quantity	14,233	10,327	12,382
Germany	Quantity	5,032	4,729	4,624
Italy	Quantity	—	—	2,739
Japan	Quantity	3,704	2,450	2,671
Netherlands	Quantity	569	652	1,100
South Korea	Quantity	725	1,092	724
Taiwan	Quantity	920	719	722
All other exporters	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All reporting exporters	Quantity	***	***	***
United States	Value	***	***	***
India	Value	17,791	12,710	14,838
Turkey	Value	***	***	***
Subject sources	Value	***	***	***
Kazakhstan	Value	42,733	37,780	23,999
China	Value	12,910	13,097	18,099
South Africa	Value	20,763	15,721	16,887
Germany	Value	7,982	8,007	7,183
Italy	Value	—	—	3,221
Japan	Value	7,787	6,397	6,690
Netherlands	Value	1,070	1,491	2,109
South Korea	Value	1,197	2,041	1,156
Taiwan	Value	892	614	620
All other exporters	Value	***	***	***
Nonsubject sources	Value	***	***	***
All reporting exporters	Value	***	***	***

Table continued.

**Table 7.14 (Continued) Chromium trioxide: Global exports, by reporting country and by period**

Unit values in dollars per pound; shares in percent

Exporting country	Measure	2022	2023	2024
United States	Unit value	***	***	***
India	Unit value	1.57	1.46	1.28
Turkey	Unit value	***	***	***
Subject sources	Unit value	***	***	***
Kazakhstan	Unit value	1.06	1.14	1.19
China	Unit value	1.67	1.40	1.27
South Africa	Unit value	1.46	1.52	1.36
Germany	Unit value	1.59	1.69	1.55
Italy	Unit value	—	—	1.18
Japan	Unit value	2.10	2.61	2.51
Netherlands	Unit value	1.88	2.29	1.92
South Korea	Unit value	1.65	1.87	1.60
Taiwan	Unit value	0.97	0.85	0.86
All other exporters	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
All reporting exporters	Unit value	***	***	***
United States	Share of quantity	***	***	***
India	Share of quantity	***	***	***
Turkey	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Kazakhstan	Share of quantity	***	***	***
China	Share of quantity	***	***	***
South Africa	Share of quantity	***	***	***
Germany	Share of quantity	***	***	***
Italy	Share of quantity	***	***	***
Japan	Share of quantity	***	***	***
Netherlands	Share of quantity	***	***	***
South Korea	Share of quantity	***	***	***
Taiwan	Share of quantity	***	***	***
All other exporters	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Compiled from Official exports statistics under HS subheading 2819.10 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed November 21, 2025, and adjusted to (1) add in imports from Turkey to the United States using questionnaire data and (2) report for \*\*\*'s exports shipments from the United States also using questionnaire data.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. United States is shown at the top followed by the countries under investigation; all remaining top exporting countries are in descending order of 2024 quantity data.



**APPENDIX A**  
**FEDERAL REGISTER NOTICES**



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://www.usitc.gov). In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
90 FR 47820, October 2, 2025	Chromium Trioxide From India and Turkey; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	<a href="https://www.govinfo.gov/content/pkg/FR-2025-10-02/pdf/2025-19288.pdf">https://www.govinfo.gov/content/pkg/FR-2025-10-02/pdf/2025-19288.pdf</a>
90 FR 52096 November 19, 2025	Chromium Trioxide From India and Turkey; Revised Schedule for the Subject Proceeding	<a href="https://www.govinfo.gov/content/pkg/FR-2025-11-19/pdf/2025-20258.pdf">https://www.govinfo.gov/content/pkg/FR-2025-11-19/pdf/2025-20258.pdf</a>
90 FR 59203, December 18, 2025	Chromium Trioxide From India and Turkey; Revised Schedule for the Subject Proceeding	<a href="https://www.govinfo.gov/content/pkg/FR-2025-12-18/pdf/2025-23247.pdf">https://www.govinfo.gov/content/pkg/FR-2025-12-18/pdf/2025-23247.pdf</a>



**APPENDIX B**

**LIST OF HEARING WITNESSES**

**CALENDAR OF PUBLIC PRELIMINARY CONFERENCE**

Those listed below appeared as witnesses at the United States International Trade Commission’s preliminary conference:

- Subject:** Chromium Trioxide from India and Turkey
- Inv. Nos.:** 701-TA-779 and 731-TA-1765-1766 (Preliminary)
- Date and Time:** December 3, 2025 – 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations **all virtually** via Webex.

**OPENING REMARKS:**

In Support of Imposition (**Nithya Nagarajan**, Husch Blackwell)  
In Opposition of Imposition (**Jessica DiPietro**, ArentFox Schiff LLP)

**In Support of the Imposition of the  
Antidumping and Countervailing Duty Orders:**

Husch Blackwell  
Washington, D.C.  
on behalf of

American Chrome & Chemical, Inc.

**Mehmet Guler**, General Manager, American Chrome and Chemical

**James McAdams**, Sales Director, American Chrome and Chemical

**Stan Hansley**, Site Manager, American Chrome and Chemical

**Jim Dougan**, Partner, ION Economics, LLC

**Nithya Nagarajan** )  
) – OF COUNSEL  
**Stephen Brophy** )

**In Opposition to the Imposition of the  
Antidumping and Countervailing Duty Orders:**

Hogan Lovells US LLP  
Washington, D.C.  
on behalf of

Koppers, Inc.  
("Koppers")

**David Roche**, Senior Purchasing Manager, Koppers, Inc.

**David Schoen**, Vice President of Purchasing and Strategic Marketing, Koppers,  
Inc.

**Michael G. Jacobson** ) – OF COUNSEL

ArentFox Schiff LLP  
Washington, D.C.  
on behalf of

Kobitex, Inc.  
Kobitex Ltd.  
Türkiye Şişe ve CamFabrikaları A.Ş.  
("Kobitex")

**Ovi Gulersen**, President, Kobitex, Inc.

**Kobi Gulersen**, Vice President, Kobitex, Inc.

**Elvira Gulersen**, Director, Kobitex, Inc.

**Jessica R. DiPietro** )  
 ) – OF COUNSEL  
**Katherine R. Afzal** )

**REBUTTAL/CLOSING REMARKS:**

In Support of Imposition (**Stephen Brophy**, Husch Blackwell)  
In Opposition of Imposition (**Michael G. Jacobson**, Hogan Lovells US LLP)



**APPENDIX C**  
**SUMMARY DATA**



**Table C.1**

**Chromium trioxide: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds CDW; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound CDW; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	2024 Interim	2025	2022-24	Calendar year 2022-23	2023-24	Interim 2024-25
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Producer's share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
India.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Producer's share (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Importers' share (fn1):									
India.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Turkey.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All import sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. importers' U.S. shipments of imports from :									
India:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	***
Turkey:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***

Table continued.

**Table C.1 Continued**

**Chromium trioxide: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds CDW; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound CDW; Period changes=percent--exceptions noted; Interim period is January through September

Item	Reported data					Period change comparisons				
	Calendar year			Interim		Calendar year			Interim	
	2022	2023	2024	2024	2025	2022-24	2022-23	2023-24	2024-25	
U.S. producer ACC's:										
Practical capacity quantity.....	***	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
U.S. shipments:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Export shipments:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***	▲***
Production workers.....	***	***	***	***	***	▲***	▲***	▼***	▲***	***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▼***	▲***	***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Productivity (pounds CDW per hour).....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Unit labor costs (dollars per pound CDW)	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Net sales:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▲***	▼***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▼***	▼***	▲***	▲***	▲***
Research and development expenses.....	***	***	***	***	***	***	***	***	***	***
Total assets.....	***	***	***	***	***	▲***	▲***	▼***	***	***

Source: Compiled from data submitted in response to Commission questionnaire. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

**APPENDIX D**

**U.S. PRODUCER'S AND IMPORTERS'**

**NARRATIVE RESPONSES ON SEMI-FINISHED PRODUCT ANALYSIS**



**Table D.1 Chromium trioxide: ACC’s narrative responses regarding the differences and similarities in unfinished chromium trioxide and the finished product chromic acid.**

<b>Factor</b>	<b>Producer name and narrative regarding semi-finished product analysis</b>
Different physical characteristics	***
Difference in value	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Narrative responses for U.S. producers includes both U.S. producers and U.S. assemblers.

**Table D.2 Chromium trioxide: U.S. importers’ narrative responses regarding the semi-finished product analysis comparing unfinished chromium trioxide and the finished product chromic acid.**

<b>Factor</b>	<b>Importer name and narrative regarding semi-finished product analysis</b>
End uses other than finished products	***
End uses other than finished products	***
End uses other than finished products	***
Market distinct for unfinished product	***
Market distinct for unfinished product	***
Market distinct for unfinished product	***
Different physical characteristics	***
Different physical characteristics	***
Different physical characteristics	***
Different physical characteristics	***
Different physical characteristics	***
Difference in value	***
Difference in value	***
Difference in value	***
Difference in value	***
Conversion in finished product intensive	***
Conversion in finished product intensive	***
Conversion in finished product intensive	***

