

Certain Activated Carbon Antidumping

Sunset Review Hearing

SUBMITTED BY ARENT FOX LLP

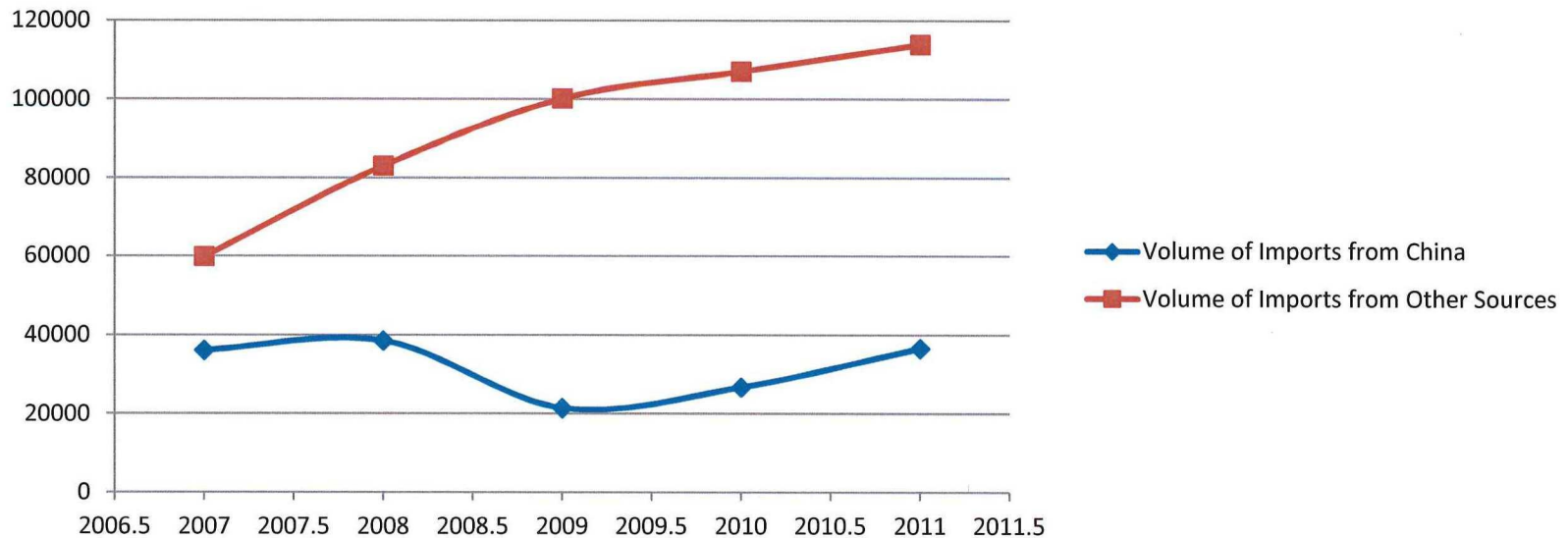
Why the Antidumping Order Should be Revoked.

1. The demand of Activated Carbon, both domestically and internationally is at an all time high. Mainly due to:

- Strict penalties imposed by environmental protection agencies on various companies that release pollutants to the environment,
- Increased activated carbon requirements in developing countries such as China itself.

Import Volumes from China & other Countries (Quantity 1000 pounds). Information obtain from Pre- Hearing report IV-3

<u>Source</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>
China	36130	38541	21503	26729	36581
Other	59864	83149	100234	107094	113978



2. The raw material used to make the subject Coal activated Carbon is increasingly in short supply, because:

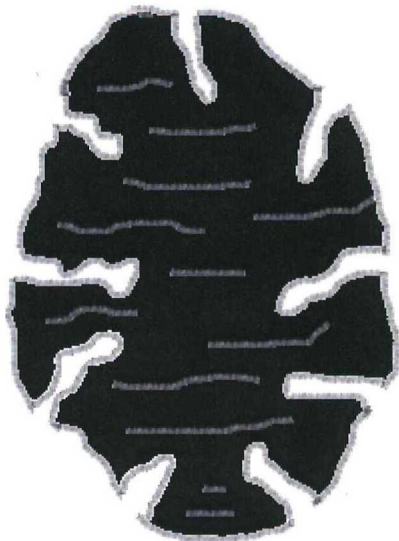
- Many Chinese coal mines have shut down due to safety & environmental issues,
- Which was instrumental in shutting down almost 50% of the coal activated carbon manufacturers in China,
- Strict environmental and mining regulations in the US have also limited the ability of increasing production capacity in the US

3. Coal Activated Carbon manufactured domestically here in the US and in China are two different types and is subject to different manufacturing procedures due to the original state of the raw material.

Difference Between Direct vs. Reagglomerated Coal Activated Carbon

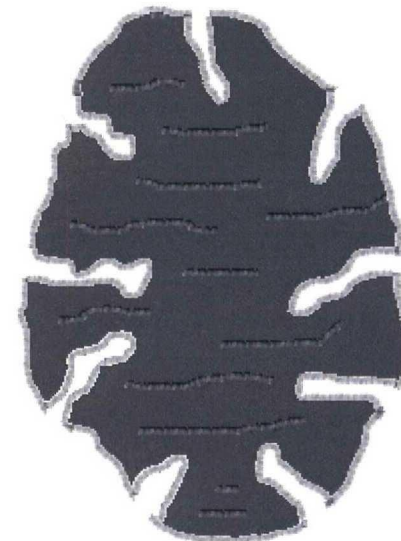
Pore Structure of Direct coal activated carbon : Even though the pore structure looks almost the same the product/s used to manufacture coal activated carbon is different.

Direct coal activated carbon is made by directly activating coal.



Pore Structure of Reagglomerated coal activated carbon : Even though the pore structure looks the same the product/s used to manufacture coal activated carbon is different.

Because Reagglomerated coal activated carbon is made by pulverizing coal and then adding a binder creating a briquette which is then crushed, carbonized and finally activated.



Direct & Reagglomerated Coal Base Activated Carbon are only sometimes “interchangeable”

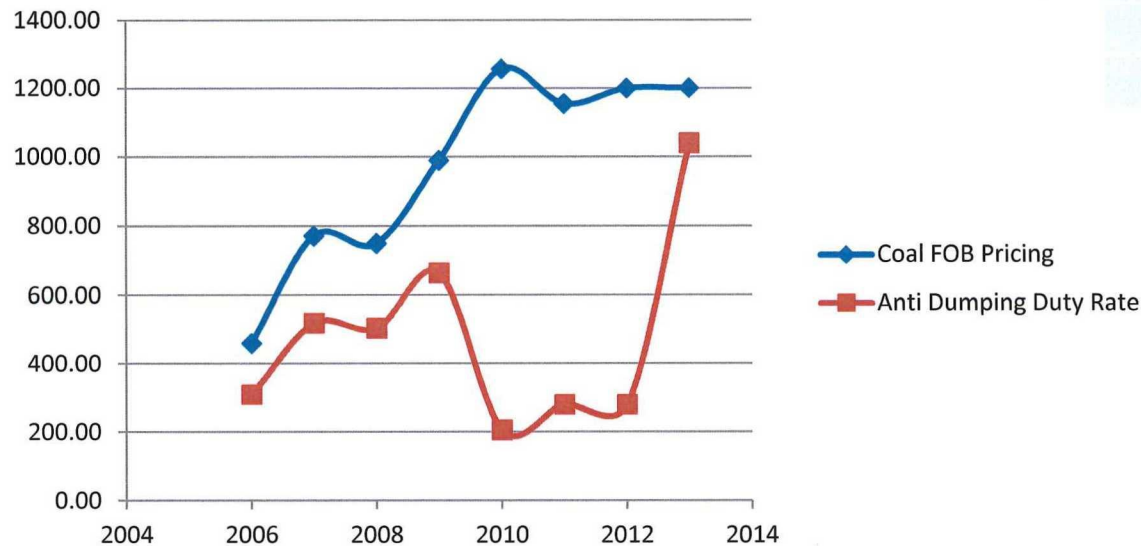
- This is because currently in the US we have four different groups of Coal Base Activated Carbon customers. They are as follows:
 1. Customers who only want Reagglomerated CAC made in the US,
 2. Customers who want Reagglomerated CAC made either in the US or China,
 3. Customers who only want Direct CAC without binders,
 4. Customers who only want CAC regardless of Reagglomerated or Direct.

4. Current coal activated carbon prices are higher than what it was during the initiation of the AD order, and there is no reason to believe that pricing will change if the order is revoked.

Pricing for 8X30 & 12X40 Coal Base Regular Activated Carbon

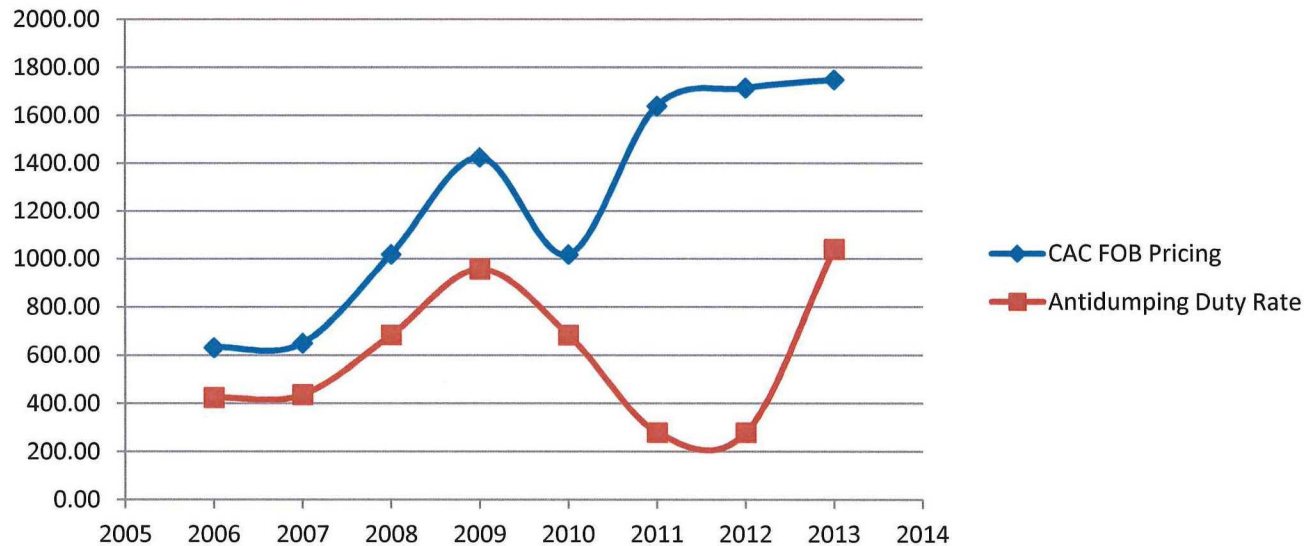
<u>Year</u>	<u>Coal FOB Pricing (\$)</u>	<u>Regular Duty</u>	<u>Anti Dumping Duty Rate</u>	<u>Antidumping Duty Rate (\$)</u>
2006	460.00	4.80%	67.14%	308.84
2007	771.99	4.80%	67.14%	518.31
2008	750.00	4.80%	67.14%	503.55
2009	990.00	4.80%	67.14%	664.69
2010	1257.25	4.80%	16.35%	205.56
2011	1155.00	4.80%	0.28/Kg	280.00
2012	1200.00	4.80%	0.28/Kg	280.00
2013	1201.00	4.80%	1.04/Kg	1040.00

<u>Review Results from Period 3</u>	
<u>Exporter</u>	<u>Margin</u>
Jacobi Carbons AB	0.00/Kg
Calgon Carbon (Tiajin) Co. Ltd	0.00/Kg
Ningxia Hua Hui Activated Carbon Co. Ltd	0.44/Kg
Ningxia Guanhua Cherishment Activated Carbon Co. Ltd.	0.28/Kg
Shanxi DMD Corporation	0.28/Kg
Shanxi Industry Technology Trading Co. Ltd	0.28/Kg
Shanxi Sincere Industrial Co. Ltd	0.28/Kg
Tangshan Solid Carbon Co. Ltd	0.28/Kg
Tiajin Maijin Industrias Co. Ltd	0.28/Kg
PRC- Wide rate	2.42/Kg



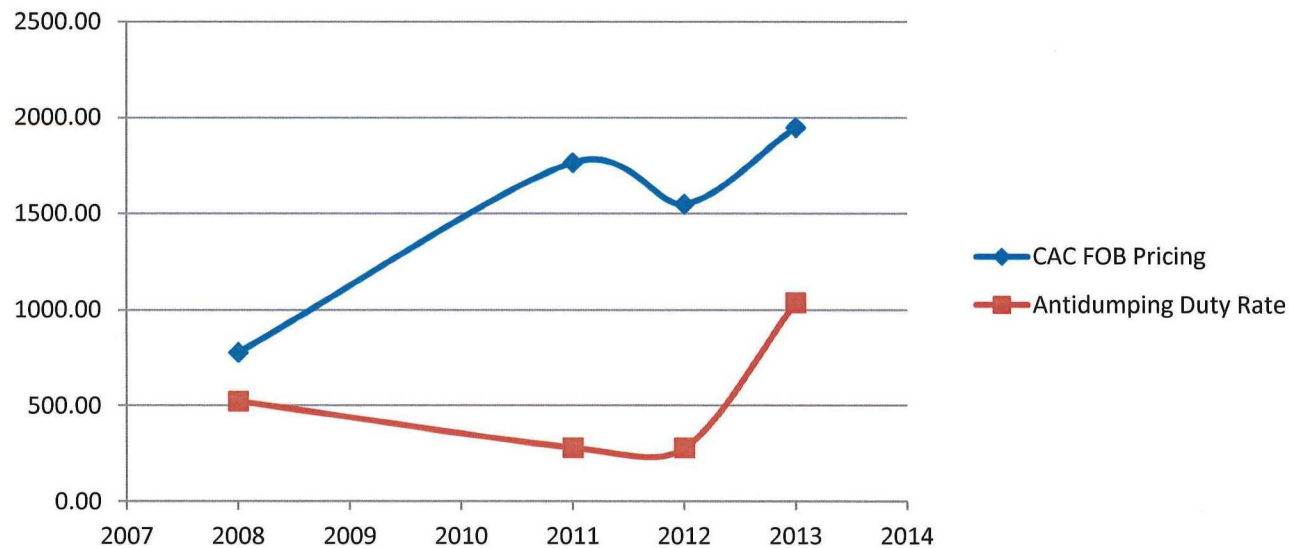
Pricing for 8X30 & 12X40 Coal Base Acid Washed Activated Carbon

<u>Year</u>	<u>Coal FOB Pricing (\$)</u>	<u>Regular Duty</u>	<u>Anti Dumping Duty Rate</u>	<u>Antidumping Duty Rate (\$)</u>
2006	632.00	4.80%	67.14%	424.32
2007	650.00	4.80%	67.14%	436.41
2008	1019.00	4.80%	67.14%	684.16
2009	1425.00	4.80%	67.14%	956.75
2010	1018.00	4.80%	16.35%	683.49
2011	1640.00	4.80%	0.28/Kg	280.00
2012	1715.00	4.80%	0.28/Kg	280.00
2013	1750.00	4.80%	1.04/Kg	1040.00



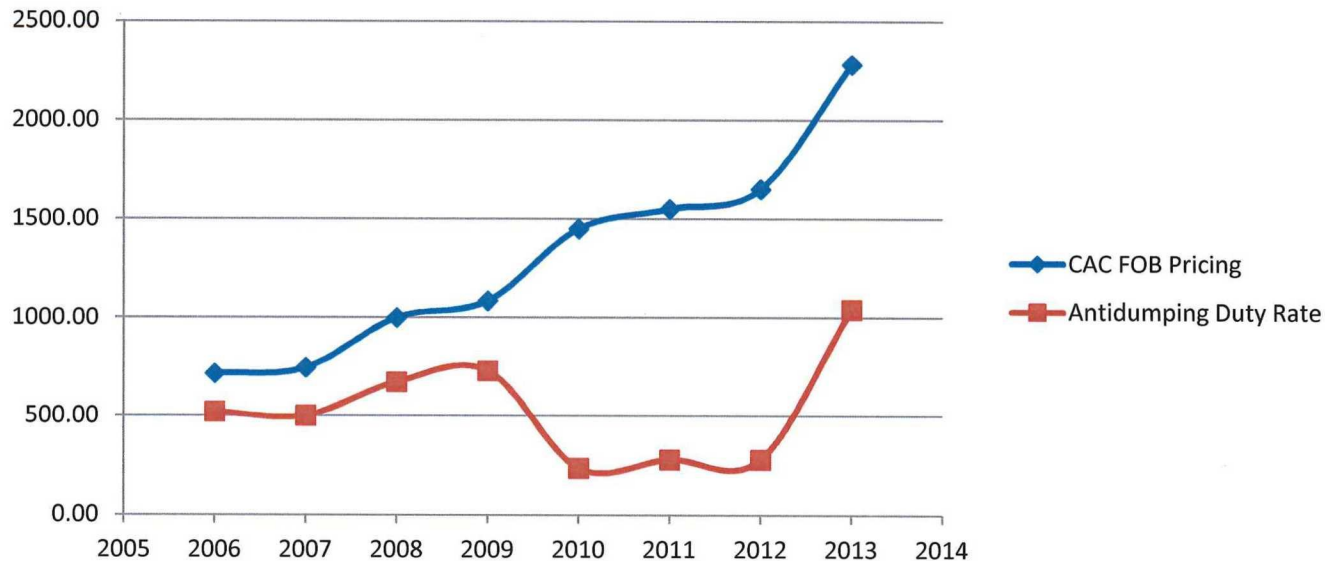
Pricing for 8X30 & 12X40 Coal Base Reagglomerated Activated Carbon

<u>Year</u>	<u>Coal FOB Pricing (\$)</u>	<u>Regular Duty</u>	<u>Anti Dumping Duty Rate</u>	<u>Antidumping Duty Rate (\$)</u>
2008	780.00	4.80%	67.14%	523.69
2011	1765.00	4.80%	.28/Kg	280.00
2012	1550.00	4.80%	0.28/Kg	280.00
2013	1950.00	4.80%	1.04/Kg	1040.00



Pricing for 4mm, 3mm & 2mm Coal Base Activated Carbon

<u>Year</u>	<u>Coal FOB Pricing (\$)</u>	<u>Regular Duty</u>	<u>Anti Dumping Duty Rate</u>	<u>Antidumping Duty Rate (\$)</u>
2006	715.00	4.80%	67.14%	518.52
2007	745.00	4.80%	67.14%	500.19
2008	1000.00	4.80%	67.14%	671.40
2009	1085.00	4.80%	67.14%	728.47
2010	1450.00	4.80%	16.35%	237.08
2011	1550.00	4.80%	0.28/Kg	280.00
2012	1650.00	4.80%	0.28/Kg	280.00
2013	2283.00	4.80%	1.04/Kg	1040.00



Pricing for -325 Coal Base Activated Carbon (Powder)

<u>Year</u>	<u>Coal FOB Pricing (\$)</u>	<u>Regular Duty</u>	<u>Anti Dumping Duty Rate</u>	<u>Antidumping Duty Rate (\$)</u>
2006	520.00	4.80%	67.14%	349.13
2007	520.00	4.80%	67.14%	349.13
2008	580.00	4.80%	67.14%	389.41
2009	485.00	4.80%	67.14%	325.63
2010	525.00	4.80%	16.35%	85.84
2011	577.00	4.80%	0.28/Kg	280.00
2012	750.00	4.80%	0.28/Kg	280.00
2013	850.00	4.80%	1.04/Kg	1040.00

