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February 14, 2024

**VIA ELECTRONIC FILING**

The Honorable Gina Raimondo  
Secretary of Commerce  
Attention: Enforcement and Compliance  
APO/Dockets Unit, Room 18022  
U.S. Department of Commerce  
14th Street and Constitution Avenue, NW  
Washington, DC 20230

The Honorable Lisa R. Barton  
Secretary  
U.S. International Trade Commission  
500 E Street, SW, Room 112A  
Washington, DC 20436

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DOC Investigation Nos.: A-428-852, A-533-924, A-588-882,  
A-421-817, A-518-001, A-274-810, C-428-853, C-533-925,  
C-518-002, and C-274-811

USITC Investigation Nos.: 731-TA-xxxx-xxxx, 701-TA-xxxx  
Total Pages: 7,016  
Investigation  
AD/CVD Operations

Business Proprietary Information Removed from Volume I at Pages  
iii, 1, 2, 4, 5, 7-10, 21, 22, 24, 27-28, 30-34, 36, 37, 39, 40 and from  
Exhibits I-1, I-6, I-8, I-20, I-25 – I-28; Volume II at Pages 1, 2, 4  
and from Exhibits II-6 - II-8.; Volume III at Pages 1-4 and from  
Exhibits III-4 – III-7; Volume IV at Pages 1, 2, 4 and from Exhibits  
IV-6, IV-7; Volume V at Pages 1, 3 and from Exhibits V-5, V-6;  
Volume VI at Pages 2-4 and from Exhibits VI-6, VI-8, VI-9;  
Volume VII at Pages 1-4 and from Exhibits VII-7, VII-8; Volume  
VIII at Pages iv, 1, 2 and from Exhibit VIII-2; Volume IX at Pages  
v, 3 and from Exhibit IX-3; Volume X at Pages iii, 1, 22 and from  
Exhibit X-1; Volume XI at Pages ii, 1, 3 and from Exhibit XI-2

**PUBLIC VERSION**

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**Re: Petitions for the Imposition of Antidumping and Countervailing Duties on Imports of Melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago**

Dear Secretary Raimondo and Secretary Barton,

On behalf of Cornerstone Chemical Company (“Petitioner”), we respectfully submit to the U.S. Department of Commerce (“the Department”) and the U.S. International Trade Commission (“the Commission”) petitions for the imposition of antidumping and countervailing duties on U.S. imports of melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago. The Petitioner is a domestic producer of melamine, and, therefore, is an interested party within the meaning of 19 U.S.C. § 1677(9)(C).

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The petitions are contained in the following volumes:

- Volume I of the petitions contains general information and the allegations of injury, along with associated exhibits;
- Volume II contains antidumping duty allegations with respect to Germany;
- Volume III contains antidumping duty allegations with respect to India;
- Volume IV contains antidumping duty allegations with respect to Japan;
- Volume V contains antidumping duty allegations with respect to the Netherlands;
- Volume VI contains antidumping duty allegations with respect to Qatar;
- Volume VII contains antidumping duty allegations with respect to Trinidad and Tobago;
- Volume VIII contains countervailing duty allegations with respect to Germany;
- Volume IX contains countervailing duty allegations with respect to India;
- Volume X contains countervailing duty allegations with respect to Qatar; and
- Volume XI contains countervailing duty allegations with respect to Trinidad & Tobago.

We are submitting proprietary and public versions of each volume.

Pursuant to 19 C.F.R. §§ 351.202(d) and 351.304 of the Department's regulations, and 19 C.F.R. § 201.6(b) of the Commission's rules, we request business proprietary treatment for the bracketed information in the narratives and exhibits of these petitions, as detailed below.

Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of the submitter and would impair the ability of the Department and the Commission to obtain information in the future that is necessary to fulfill their statutory functions.

Volume I (General Information and Injury):

**Pages iii, 1, 2, 4, 5, 7-10, 21, 22, 24, 27-28, 30-34, 36, 37, 39, 40 and Exhibits I-1, I-6, I-8, I-20, I-25 – I-28:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, distributors or suppliers, the names of individuals from whom information was obtained, other information of commercial value, and

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other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. §§ 201.6 & 351.105(c)).

Volume II (Germany AD Allegation):

**Pages 1, 2, and 4 and Exhibits II-6 - II-8:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume III (India AD Allegation):

**Pages 1-4 and Exhibits III-4 – III-7:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume IV (Japan AD Allegation):

**Pages 1, 2, and 4 and Exhibits IV-6, IV-7:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume V (Netherlands AD Allegation):

**Pages 1, 3 and Exhibits V-5, V-6:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

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Volume VI (Qatar AD Allegation):

**Pages 2-4 and Exhibits VI-6, VI-8, VI-9:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume VII (Trinidad and Tobago AD Allegation):

**Pages 1-4 and Exhibits VII-7, VII-8:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume VIII (Germany CVD Allegation):

**Pages iv, 1, 2 and Exhibit VIII-2:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume IX (India CVD Allegation):

**Pages v, 3 and Exhibit IX-3:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

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Volume X (Qatar CVD Allegation):

**Pages iii, 1, 22 and Exhibit X-1:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

Volume XI (Trinidad and Tobago CVD Allegation):

**Pages ii, 1, 3 and Exhibit XI-2:** Business or trade secrets concerning the nature of a production process, production and distribution costs, terms of sale, prices of individual sales, likely sales, and offers, names of particular U.S. producers or customers, the names of individuals from whom information was obtained, and other specific business information the release of which to the public would cause substantial harm to the competitive position of the submitters and other persons, firms, partnerships, corporations, or other organizations from which the information was obtained (19 C.F.R. § 351.105(c)).

The requisite certification that substantially identical information is not available to the public is set forth as an attachment to this letter, in accordance with section 201.6(b)(3)(iii) of the Commission's rules. Also attached are the requisite company and counsel certifications regarding the completeness and accuracy of the information contained in the petitions.

Pursuant to section 351.304(b)(1) of the Department's regulations, Petitioner agrees in principle to permit disclosure of business proprietary information contained in the petitions under an appropriately drawn administrative protective order ("APO"). Petitioner respectfully reserves the right, however, to comment on all APO applications prior to disclosure. A public version of these petitions has been prepared and is being filed simultaneously with this submission pursuant to Commerce's regulations, 19 C.F.R. § 351.304(c)(1), and the Commission's rules, 19 C.F.R. § 201.8(d).

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Pursuant to section 351.202(c) of the Department's regulations, we certify that the petitions and all required copies were filed today with both the Department and the Commission. The petitions are being filed electronically on the Department's ACCESS filing system and on the Commission's EDIS filing system.

If you have any questions regarding this petition, please contact us.

Respectfully submitted,

/s/ Stephen J. Orava  
Stephen J. Orava  
Stephen P. Vaughn  
Patrick J. McLain  
Nicholas K. Paster  
Richard C. Lutz, Consultant  
Bonnie B. Byers, Consultant

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*Counsel to Petitioner*

COMPANY CERTIFICATION

I, Michael Driscoll, Global Business Manager, currently employed by Cornerstone Chemical Company, certify that I prepared or otherwise supervised the preparation of the attached submission, *Petitions for the Imposition of Antidumping and Countervailing Duties on Imports of Melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago*, filed on February 14, 2024. I certify that the public information and any business proprietary information of Cornerstone Chemical Company contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce and the International Trade Commission. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD or CVD proceedings, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: \_\_\_\_\_

  
Michael Driscoll

Date: \_\_\_\_\_



REPRESENTATIVE CERTIFICATION

I, Stephen J. Orava, with King & Spalding LLP, counsel to Cornerstone Chemical Company, certify that I have read the attached submission, *Petitions for the Imposition of Antidumping and Countervailing Duties on Imports of Melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago* filed on February 14, 2024. In my capacity as Counsel, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. § 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD or CVD proceedings, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: \_\_\_\_\_

  
Stephen J. Orava

Date: February 14, 2024



