



UNITED STATES DEPARTMENT OF COMMERCE
International Trade Administration
Washington, D.C. 20230

A-570-847
Sunset Review
Public Document
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July 1, 2013

MEMORANDUM TO: Paul Piquado
Assistant Secretary
for Import Administration

FROM: Christian Marsh *CPM*
Deputy Assistant Secretary
for Antidumping and Countervailing Duty Operations

SUBJECT: Issues and Decision Memorandum for the Expedited Sunset
Review of the Antidumping Duty Order on Persulfates from the
People's Republic of China

Summary

In the sunset review of the antidumping duty order covering persulfates from the People's Republic of China ("PRC"), FMC Corporation ("FMC"), a domestic producer of persulfates, submitted a substantive response. No respondent interested party submitted a substantive response. Accordingly, we conducted an expedited (120-day) sunset review. We recommend adopting the positions described below. The following is a complete list of issues in this sunset review for which we received substantive responses:

1. Likelihood of continuation or recurrence of dumping; and
2. Magnitude of the dumping margin likely to prevail.

Background

On March 1, 2013, the Department of Commerce ("Department") published the notice of initiation of the sunset review of the antidumping duty order on persulfates from the PRC, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("Act").¹ On March 15, 2013, pursuant to 19 CFR 351.218(d)(1), the Department received a timely and complete notice of intent to participate in the sunset review from FMC. On April 1, 2013, pursuant to 19 CFR 351.218(d)(3), FMC filed a timely and adequate substantive response within 30 days after the date of publication of the *Sunset Initiation*. The Department received no substantive responses from any respondent interested party. As a result, pursuant to section 751(c)(3)(B) of the Act and 19 CFR 351.218(e)(1)(ii)(C)(2), the Department conducted an expedited (120-day) sunset review of the antidumping duty order on persulfates from the PRC.

¹ See *Initiation of Five-Year ("Sunset") Review*, 76 FR 13862 (March 1, 2013) ("*Sunset Initiation*").



History of the Order

On July 7, 1997, the Department published an antidumping duty order on imports of persulfates from the PRC.² The Department found the following weighted-average dumping margins:

Exporter	Weighted-Average Dumping Margin (Percent)
Sinochem Jiangsu Wuxi Import & Export Corporation (“Wuxi”).	32.22
Shanghai AJ Import & Export Corporation (or Shanghai Ai Jain Import & Export Corporation) (“Ai Jian”)	34.41
Guangdong Petroleum Chemical Import & Export Trade Corporation (“Guangdong Petroleum”)	34.97
PRC-Wide Entity	119.02

Administrative Reviews

Since the issuance of the antidumping duty order, the Department has completed eight administrative reviews.³ The Department has also terminated or rescinded five administrative reviews.⁴ Additionally, the Department completed a changed circumstances review.⁵ Further,

² See *Notice of Antidumping Duty Order and Amended Final Determination of Sales at Less Than Fair Value: Persulfates From the People’s Republic of China*, 62 FR 36259 (July 7, 1997) (“*Antidumping Order*”), amended by *Notice of Amended Antidumping Duty Order: Persulfates From the People’s Republic of China*, 62 FR 39212 (July 22, 1997).

³ See *Persulfates from the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 64 FR 69494 (December 13, 1999) (“*Persulfates I*”), *Persulfates From the People’s Republic of China: Final Results of Antidumping Duty Administrative Review and Partial Rescission of Administrative Review*, 65 FR 46691 (July 31, 2000) (“*Persulfates II*”), *Persulfates From the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 66 FR 42628 (August 14, 2001), *Persulfates from the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 68 FR 6712 (February 10, 2003), *Persulfates from the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 68 FR 68030 (December 5, 2003), *Persulfates from the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 70 FR 6836 (February 9, 2005), *Persulfates From the People’s Republic of China: Final Results of Antidumping Duty Administrative Review*, 71 FR 7725 (February 14, 2006) (“*Persulfates VII*”), and *Persulfates From the People’s Republic of China: Final Results of 2009-2010 Antidumping Duty Administrative Review*, 76 FR 28419 (May 17, 2011) (“*Persulfates XIII*”).

⁴ See *Persulfates from the People’s Republic of China: Notice of Rescission of Antidumping Duty Administrative Review*, 71 FR 13810 (March 17, 2006), *Persulfates from the People’s Republic of China: Notice of Rescission of Antidumping Duty Administrative Review*, 71 FR 75935 (December 19, 2006), *Persulfates from the People’s Republic of China: Notice of Rescission of Antidumping Duty Administrative Review*, 73 FR 2900 (January 16, 2008), *Persulfates From the People’s Republic of China: Notice of Rescission of the 2007-2008 Administrative Review of the Antidumping Duty Order*, 74 FR 798 (January 8, 2009) (“*Persulfates XI*”), *Persulfates From the People’s Republic of China: Notice of Rescission of the 2008-2009 Administrative Review of the Antidumping Duty Order*, 75 FR 2112 (January 14, 2010) (“*Persulfates XII*”).

⁵ See *Persulfates from the People’s Republic of China: Notice of Final Results of Changed Circumstances Review*, 68 FR 68031 (December 5, 2003).

the Department has conducted two sunset reviews, both of which resulted in continuation of the order.⁶

Scope Inquiries, New Shipper Reviews, and Duty Absorption

There have been no scope clarifications, new shipper reviews, or duty absorption findings in this proceeding in connection with the antidumping duty order on persulfates from the PRC.

Discussion of the Issues

Legal Framework

In accordance with section 751(c)(1) of the Act, the Department is conducting this sunset review to determine whether revocation of the antidumping duty order would be likely to lead to a continuation or recurrence of dumping. Sections 752(c)(1)(A) and (B) of the Act provide that, in making these determinations, the Department shall consider both the weighted-average dumping margins determined in the investigation and subsequent reviews, and the volume of imports of the subject merchandise for the periods before, and the periods after, the issuance of the antidumping duty order.

As explained in the Statement of Administrative Action (“SAA”) accompanying the Uruguay Round Agreements Act, the Department normally determines that revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping when: (a) dumping continued at any level above *de minimis* after issuance of the order; (b) imports of the subject merchandise ceased after issuance of the order; or (c) dumping was eliminated after the issuance of the order and import volumes for the subject merchandise declined significantly.

Alternatively, the Department normally will determine that revocation of an antidumping duty order is not likely to lead to continuation or recurrence of dumping where dumping was eliminated after issuance of the order and import volumes remained steady or increased.⁷ In addition, as a base period for import volume comparison, it is the Department’s practice to use the one-year period immediately preceding the initiation of the investigation, rather than the level of pre-order import volumes, as the initiation of an investigation may dampen import volumes and, thus, skew comparison.⁸

Further, section 752(c)(3) of the Act states that the Department shall provide to the International Trade Commission (“ITC”) the magnitude of the margin of dumping likely to prevail if the order were revoked. Generally, the Department selects the margin(s) from the final determination in the original investigation, as this is the only calculated rate that reflects the behavior of exporters without the discipline of an order in place.⁹ However, the Department may use a rate from a

⁶ See *Notice of Continuation of Antidumping Duty Order: Persulfates from the People’s Republic of China*, 67 FR 78415 (December 24, 2002), and *Persulfates from the People’s Republic of China: Continuation of Antidumping Duty Order*, 73 FR 21318 (April 21, 2008).

⁷ See SAA, H.R. Rep. No. 103-316, Vol. 1 (1994), at 889-90.

⁸ See, e.g., *Stainless Steel Bar from Germany; Final Results of the Sunset Review of the Antidumping Duty Order*, 72 FR 56985 (October 5, 2007), and accompanying Issues and Decision Memorandum at Comment 1.

⁹ See SAA at 890. See, e.g., *Persulfates From the People’s Republic of China: Notice of Final Results of Expedited Second Sunset Review of Antidumping Duty Order*, 73 FR 11868 (March 5, 2008), and accompanying Issues and Decision Memorandum at Comment 2.

more recent review where the dumping margin increased, as this rate may be more representative of a company's behavior in the absence of an order (e.g., where a company increases dumping to maintain or increase market share with an order in place).¹⁰ Finally, pursuant to section 752(c)(4)(A) of the Act, a dumping margin of "zero or *de minimis* shall not by itself require" the Department to determine that revocation of an antidumping duty order would not be likely to lead to a continuation or recurrence of sales at less than fair value.

In the *Final Modification for Reviews*, the Department announced that in five-year ("sunset") reviews, it will not rely on weighted-average dumping margins that were calculated using the methodology determined by the Appellate Body to be World Trade Organization (WTO)-inconsistent.¹¹ The Department also noted that "*only in the most extraordinary circumstances* will the Department rely on margins other than those calculated and published in prior determinations."¹²

Below we address the comments submitted by FMC.

1. Likelihood of continuation or recurrence of dumping

Interested Party Comments

- FMC asserts that section 752(c)(1) of the Act requires the Department to determine whether revocation of an antidumping duty order would be likely to lead to continuation or recurrence of dumping, also citing *Procedures for Conducting Five-year ("Sunset") Reviews of Antidumping and Countervailing Duty Orders*, 63 FR 13516 (March 20, 1998). FMC also asserts that the Department should consider (1) the weighted-average dumping margins determined in the investigation and subsequent reviews, and (2) the volume of imports of the subject merchandise for the periods before and after the issuance of the antidumping duty order.
- FMC notes that in the original investigation, the Department reviewed the sales of three exporters (i.e., Wuxi, Ai Jian and Guangdong Petroleum). FMC argues that, over 13 administrative reviews, dumping continued at levels above *de minimis*.
- According to FMC, in *Persulfates I*, Wuxi and Ai Jian received dumping margins of 7.18 percent and 5.41 percent, respectively, whereas Guangdong Petroleum refused to cooperate with the Department and was assigned the rate of 119.02 percent as part of the PRC-wide entity. FMC further maintains that in *Persulfates II*, Wuxi refused to cooperate with the Department and was assigned the rate of 119.02 percent as part of the PRC-wide entity, while Ai Jian continued dumping at a rate of 2.62 percent. FMC maintains that Ai Jian also received the rate of 119.02 percent as part of the PRC-wide entity in *Persulfates XIII* because it refused to cooperate with the Department. Consequently, FMC notes that all Chinese exporters of persulfates to the United States,

¹⁰ See SAA, at 890-91.

¹¹ See *Antidumping Proceedings: Calculation of the Weighted-Average Dumping Margin and Assessment Rate in Certain Antidumping Duty Proceedings; Final Modification*, 77 FR 8101 (February 14, 2012) ("*Final Modification for Reviews*").

¹² See *id.* (emphasis added).

effective with the final results of *Persulfates XIII*, are considered part of the PRC-wide entity and subject to a cash deposit rate of 119.02 percent.

- With regard to the cessation of imports, FMC asserts that two of the three respondent companies (Guangdong Petroleum and Wuxi) withdrew from the U.S. market shortly after the order was issued. FMC submits that the cessation of imports by Wuxi, Guangdong Petroleum and, allegedly, Ai Jian, demonstrates that the companies are unable to ship to the United States without dumping. FMC explains that, as stated in the SAA:

The cessation of imports after the order, is highly probative of the likelihood of continuation or recurrence of dumping. . . . If imports cease after the order is issued, it is reasonable to assume that the exporters could not sell in the United States without dumping and that, to re-enter the U.S. market, they would have to resume dumping.¹³

- FMC claims that on an industry-wide basis, PRC exports of persulfates to the United States are moving toward historic lows. FMC argues that this is further evidence that PRC companies generally cannot participate in the U.S. market without dumping. FMC argues that because import volumes have declined significantly since issuance of the order, and dumping has continued at above *de minimis* levels, the Department must find that, if the antidumping duty order on persulfates from the PRC were revoked, dumping by PRC exporters would likely continue or recur.

Department's Position: As explained in the Legal Framework section above, the Department's determination concerning whether revocation of an antidumping duty order is likely to lead to continuation or recurrence of dumping is based, in part, upon guidance provided by the legislative history accompanying the Uruguay Round Agreements Act (*i.e.*, the SAA; House Report, H. Rep. No. 103-826, pt. 1 (1994) ("House Report"); and Senate Report, S. Rep. No. 103-412 (1994)). Consistent with the SAA, the Department will make its likelihood determination on an order-wide basis.¹⁴ Further, when determining whether revocation of the order would be likely to lead to continuation of dumping, sections 752(c)(1)(A) and (B) of the Act instruct the Department to consider: (1) the weighted-average dumping margins determined in the investigation and subsequent reviews; and (2) the volume of imports of the subject merchandise for the period before and after the issuance of the antidumping duty order. Thus, one consideration is whether the Department has continued to find dumping above *de minimis* levels in administrative reviews subsequent to imposition of the antidumping duty order.¹⁵ According to the SAA and the House Report, "if companies continue to dump with the discipline of an order in place, it is reasonable to assume that dumping would continue if the discipline were removed."¹⁶ In the instant sunset review, for the reasons stated below, we find that revocation of the antidumping duty order on persulfates from the PRC would likely result in the continuation or recurrence of dumping in the United States.

¹³ See SAA, at 890.

¹⁴ See SAA, at 879.

¹⁵ See *id.*, at 890.

¹⁶ *Id.*; see also House Report, at 63-64.

In this case, PRC exporters of persulfates have continued to sell into the United States at prices below normal value following the issuance of the *Antidumping Order*. Since issuance of the *Antidumping Order*, the Department has found dumping at rates exceeding *de minimis* levels in numerous completed reviews. In particular, since the completion of the second persulfates sunset review, Ai Jian's dumping margin of 36.53 percent, which was calculated in *Persulfates VII*, remained the same in *Persulfates XI* and *Persulfates XII*. Moreover, in *Persulfates XIII*, the Department assigned Ai Jian¹⁷ the rate of 119.02 percent, which remains in effect for all of the other exporters of persulfates from the PRC, because Ai Jian failed to cooperate with the Department. Accordingly, all exporters of persulfates from the PRC to the United States, effective with the final results of *Persulfates XIII*, are subject to the rate of 119.02 percent as part of the PRC-wide entity.

Pursuant to section 752(c)(1)(B) of the Act, the Department also considered the volume of imports of the subject merchandise in determining whether revocation of the antidumping duty order is likely to lead to continuation or recurrence of dumping. As discussed above, it is the Department's practice to compare the volume of imports for the one-year period preceding the initiation of the less than fair value ("LTFV") investigation to the volume of imports after the issuance of the order. Since the issuance of the *Antidumping Order*, import volumes of persulfates into the United States from the PRC have declined dramatically and remain below pre-investigation levels.¹⁸ In analyzing import volumes for the five years following the last sunset review, based on Harmonized Tariff Schedule of the United States ("HTSUS") U.S. Bureau of Census import data, as reported by Global Trade Atlas, the Department has determined that imports from the PRC under the HTSUS numbers listed in the scope of the *Antidumping Order* have generally remained at levels lower than the year immediately preceding the initiation of the LTFV investigation (*i.e.*, 1996).¹⁹ Thus, record evidence shows decreased imports over the last five years when compared to pre-initiation import volumes.

Therefore, pursuant to section 752(c)(1) of the Act, because the Department has found dramatically lower import volumes in the five years covered by this sunset review in comparison to import volumes prior to issuance of the *Antidumping Order*, accompanied by the existence of dumping after the issuance of the *Antidumping Order*, we find that dumping is likely to continue or recur if the *Antidumping Order* is revoked.

2. Magnitude of the Margin of Dumping Likely to Prevail

- FMC states that section 752(c)(3) of the Act directs the Department to provide the ITC with the magnitude of the margin of dumping that is likely to prevail if the Department revokes the order. FMC adds that the SAA, at 890, states that the Department will normally select a margin "from the investigation, because that is the only calculated rate

¹⁷ In *Persulfates XIII*, based on information available to the Department on the record, the Department recognized that Shanghai AJ Import & Export Corporation (or Shanghai Ai Jain Import & Export Corporation) ("Ai Jian") was also known as, or had additionally assumed the name of, United Initiators (Shanghai) Co. See *Persulfates XIII*; see also the cash deposit instructions issued by the Department to U.S. Customs and Borders Protection, Message No. 1138315, dated 05/18/2011, at 2.

¹⁸ See Attachment to this memorandum.

¹⁹ See *Id.*

that reflects the behavior of exporters without the discipline of an order.” FMC argues that there is no reason to depart from the normal policy in this case.

- FMC requests that the Department provide the ITC in this sunset review the company-specific weighted-average dumping margins found in the original investigation, as well as the rate of 119.02 percent for the PRC-wide entity as an indication of the magnitude of the dumping margins that are likely to prevail if the order under review were to be revoked.

Department’s Position: Section 752(c)(3) of the Act provides that the administering authority shall provide to the ITC the magnitude of the margin of dumping that is likely to prevail if the order were revoked. Normally, the Department will provide to the ITC the company-specific weighted-average dumping margin from the investigation for each company.²⁰ The Department’s preference for selecting a rate from the investigation is based on the fact that it is the only calculated rate that reflects the behavior of manufacturers, producers, and exporters without the discipline of an order or suspension agreement in place.²¹ Under certain circumstances, however, we may select a more recently calculated rate to report to the ITC. For companies not investigated individually, or for companies that did not begin shipping until after the order was issued, the Department will normally provide a rate based on the “All-Others” rate from the investigation. However, the Department considers the PRC to be a nonmarket economy (“NME”) under section 771(18) of the Act, and thus the Department does not have an “All-Others” rate. Thus, in PRC cases, instead of an “All-Others” rate, the Department uses an established a rate for the PRC-wide entity, which it applies to all imports from an exporter that has not established its eligibility for a separate rate.²²

As indicated in the “Discussion of the Issues” section above, the Department’s current practice is to not rely on weighted-average dumping margins calculated using the zeroing methodology modified in the *Final Modification for Reviews*. Instead, we may rely on other rates that may be available, or we may recalculate weighted-average dumping margins using our current offsetting methodology if necessary.²³

Each of the three separate rate respondents from the original investigation, has lost its eligibility for a separate rate and is now considered as part of the PRC-wide entity. Therefore, if the order were to be revoked, the Department finds that the magnitude of the margin of dumping likely to prevail for Wuxi, Ai Jian and Guangdong Petroleum would be equal to the weighted-average dumping margin for the PRC-wide entity from the antidumping investigation, *i.e.*, 119.02 percent.²⁴ Further, since there are no other companies currently eligible for a separate rate, the magnitude of the margin of dumping likely to prevail for all other exporters of persulfates from the PRC would also be equal to the weighted-average dumping margin for the PRC-wide entity

²⁰ See *Eveready Battery Co., Inc. v. United States*, 77 F. Supp. 2d 1327, 1333 (CIT 1999).

²¹ See SAA at 890 and *Sunset Policy Bulletin* at section II.B.1.

²² See *Paper Clips from the People’s Republic of China: Final Results of Expedited Sunset Review of Antidumping Duty Order*, 76 FR 26242 (May 6, 2011), and accompanying Issues and Decision Memorandum at Comment 2; 19 CFR 351.107(d).

²³ See *Final Modification for Reviews*.

²⁴ See *Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People’s Republic of China: Final Results of the Expedited Third Sunset Review of the Antidumping Duty Order*, 76 FR 76143 (December 6, 2011).

from the antidumping investigation. The weighted-average dumping margin for the PRC-wide entity in the antidumping investigation was based on the dumping margin from the petition and, therefore, does not include zeroing and is consistent with the *Final Modification for Reviews*.

Final Results of Review

We determine that revocation of the antidumping duty order on persulfates from the PRC would likely lead to continuation or recurrence of dumping and that the magnitude of the margin of dumping likely to prevail would be 119.02 percent for all exporters of persulfates from the PRC, including Wuxi, Ai Jian and Guangdong Petroleum.

Recommendation

Based on our analysis of the substantive response received, we recommend adopting the above positions. If these recommendations are accepted, we will publish the final results of this expedited sunset review in the *Federal Register* and notify the ITC of our determination.

✓
Agree

Disagree

Paul Piquado
Paul Piquado
Assistant Secretary
for Import Administration

1 July 2013
(Date)

Attachment

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2007 - 2009									
Commodity	Unit	Description	Quantity			% Share			% Change
			2007	2008	2009	2007	2008	2009	2009/2008
283340	KG	Peroxosulfates (Persulfates)	298116	174789		100	100	100	38.94
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	230247	170789		77.23	97.71	89.29	26.97
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	67869	4000		22.77	2.29	10.71	550

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2008 - 2010									
Commodity	Unit	Description	Quantity			% Share			% Change
			2008	2009	2010	2008	2009	2010	2010/2009
283340	KG	Peroxosulfates (Persulfates)	174789	242844	34,164.00	100	100	100	-85.93
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	170789	216844	34,164.00	97.71	89.29	100	-84.24
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	4000	26000	0.00	2.29	10.71	0	-100

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2009 - 2011									
Commodity	Unit	Description	Quantity			% Share			% Change
			2009	2010	2011	2009	2010	2011	2011/2010
283340	KG	Peroxosulfates (Persulfates)	242844	34164	3,600.00	100	100	100	-89.46
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	216844	34164	3,600.00	89.29	100	100	-89.46
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	26000	0	0.00	10.71	0	0	n/a

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2010 - 2012									
Commodity	Unit	Description	Quantity			% Share			% Change
			2010	2011	2012	2010	2011	2012	2012/2011
283340	KG	Peroxosulfates (Persulfates)	34164	3600	16,480.00	100	100	100	357.78
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	0	0	16,480.00	0	0	100	n/a
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	34164	3600	0.00	100	100	0	-100

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

Comparison Period Prior to Order

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Year To Date: January - December									
Commodity	Unit	Description	Quantity			% Share			% Change
			1994	1995	1996	1994	1995	1996	1996/1995
283340	KG	Peroxosulfates (Persulfates)	1,588,730.00	2,202,772.00	2,360,421.00	100	100	100	7.16
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	1,025,230.00	1,326,840.00	1,516,121.00	64.53	60.24	64.23	14.27
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	0.00	875,932.00	844,300.00	0	39.76	35.77	-3.61
2833401000	KG	Peroxosulfates (Persulfates) Of Potassium	25,000.00	0.00	0.00	1.57	0	0	n/a
2833405000	KG	Peroxosulfates (Persulfates), Nesoi	538,500.00	0.00	0.00	33.89	0	0	n/a

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2007 - 2009									
Commodity	Unit	Description	Quantity			% Share			% Change
			2007	2008	2009	2007	2008	2009	2009/2008
283340	KG	Peroxosulfates (Persulfates)	298116	174789		100	100	100	38.94
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	230247	170789		77.23	97.71	89.29	26.97
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	67869	4000		22.77	2.29	10.71	550

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
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Commodity	Unit	Description	Quantity			% Share			% Change
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283340	KG	Peroxosulfates (Persulfates)	174789	242844	34,164.00	100	100	100	-85.93
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	170789	216844	34,164.00	97.71	89.29	100	-84.24
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	4000	26000	0.00	2.29	10.71	0	-100

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2009 - 2011									
Commodity	Unit	Description	Quantity			% Share			% Change
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2833406000	KG	Peroxosulfates (Persulfates), Nesoi	216844	34164	3,600.00	89.29	100	100	-89.46
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	26000	0	0.00	10.71	0	0	n/a

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Calendar Year: 2010 - 2012									
Commodity	Unit	Description	Quantity			% Share			% Change
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283340	KG	Peroxosulfates (Persulfates)	34164	3600	16,480.00	100	100	100	357.78
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	0	0	16,480.00	0	0	100	n/a
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	34164	3600	0.00	100	100	0	-100

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA

Comparison Period Prior to Order

United States Import Statistics From China									
Commodity: 283340, Peroxosulfates (Persulfates)									
Year To Date: January - December									
Commodity	Unit	Description	Quantity			% Share			% Change
			1994	1995	1996	1994	1995	1996	1996/1995
283340	KG	Peroxosulfates (Persulfates)	1,588,730.00	2,202,772.00	2,360,421.00	100	100	100	7.16
2833402000	KG	Peroxosulfates (Persulfates) Of Sodium	1,025,230.00	1,326,840.00	1,516,121.00	64.53	60.24	64.23	14.27
2833406000	KG	Peroxosulfates (Persulfates), Nesoi	0.00	875,932.00	844,300.00	0	39.76	35.77	-3.61
2833401000	KG	Peroxosulfates (Persulfates) Of Potassium	25,000.00	0.00	0.00	1.57	0	0	n/a
2833405000	KG	Peroxosulfates (Persulfates), Nesoi	538,500.00	0.00	0.00	33.89	0	0	n/a

Source: U.S. Department of Commerce, Bureau of Census data, as reported by GTA