



James G. Koutras
Director – Senior Corporate Counsel

July 11, 2012

The Honorable Max Baucus
Chairman
House Committee on Ways and Means
1102 Longworth House Office Building
Washington, D.C. 20510

The Honorable Dave Camp
Chairman
Senate Committee on Finance
219 Dirksen Senate Office Building
Washington, D.C. 20510

Millennium
Inorganic Chemicals
A Cristal Company

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Re: Comments And Opposition To Temporary Duty Suspension Bills Covering Imports of Titanium Dioxide

Dear Chairmen Bacus and Camp:

I am writing on behalf of Millennium Inorganic Chemicals Inc. (“Millennium”) in regard to several bills introduced in the House and Senate proposing temporary duty reductions for various forms of titanium dioxide. Millennium is a United States producer of titanium dioxide with domestic production facilities in Ashtabula, Ohio and Baltimore, Maryland that employs over five hundred workers involved in the production of titanium dioxide. Millennium’s corporate headquarters are in Hunt Valley, Maryland, and the company has R&D facilities in Glen Burnie, Maryland. Millennium is writing in opposition to any legislation that would lower or eliminate the import duty on titanium dioxide. Millennium’s opposition covers the following bills:

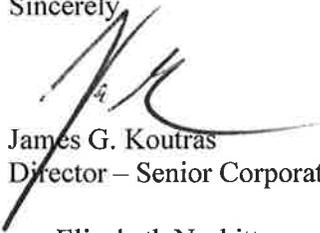
- 1) H.R. 5196 - suspending the duty on microcrystalline anatase-type titanium dioxide;
- 2) H.R. 5457 and S. 2662 - suspending the duty on pigments based on titanium dioxide;
- 3) H.R. 5339 and S. 3070 - suspending the duty on mixtures comprising titanium dioxide and decyl(trimethoxy)silane;
- 4) H.R. 5538 and S. 3075 - suspending the duty on mixtures comprising titanium dioxide, silica and decyl(trimethoxy)silane; and
- 5) H.R. 5200 and S. 2457 - suspending the duty on anatase titanium dioxide.

Millennium is an affiliate of Cristal US, Inc., a titanium powder manufacturer with a manufacturing plant in Ottawa, Illinois and an R&D facility in Lockport, Illinois. Together, Millennium and Cristal US, Inc. employ over eight hundred employees in the United States. Both companies are subsidiaries of The National Titanium Dioxide Company Limited (“Cristal”), which is the world’s second largest producer of titanium dioxide, the largest producer of merchant titanium chemicals, and the leading manufacturer of specialty titanium products. Cristal provides numerous products and services for a variety of industries around the world including the paint and coatings industry, the paper industry, and the plastics industry. Cristal also is highly committed to the development of new processes, products, and end uses, with two state-of-the-art research and development facilities in the United States.

Millennium has serious concerns that the temporary elimination of duties on titanium dioxide products will permit a flood of low-priced imports, particularly from China, where production capacity has grown significantly in recent years. This would put U.S. titanium dioxide producers at a significant disadvantage, jeopardizing our continued ability to invest in new products and processes, to maintain employment, and to upgrade facilities. Consequently, Millennium is opposed to any temporary reduction or elimination of the current tariffs on titanium dioxide.

Please do not hesitate to contact me if you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'James G. Koutras', is written over the word 'Sincerely,'.

James G. Koutras
Director – Senior Corporate Counsel

cc: Elizabeth Nesbitt
U.S. International Trade Commission

Rebecca Gudicello
U.S. Department of Commerce