

## U.S. PRODUCERS' QUESTIONNAIRE

### EPOXY RESINS FROM CHINA, INDIA, SOUTH KOREA, TAIWAN, AND THAILAND

This questionnaire must be received by the Commission by **December 11, 2024**

**See last page for instructions regarding how to file this questionnaire.**

The information called for in this questionnaire is for use by the United States International Trade Commission in connection with its countervailing and antidumping duty investigations concerning epoxy resins from China, India, South Korea, Taiwan, and Thailand (Inv. Nos. 701-TA-716-719 and 731-TA-1683-1687 (Final)). The information requested in the questionnaire is requested under the authority of the Tariff Act of 1930, Title VII. This report is mandatory and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your firm's possession (19 U.S.C. § 1333(a)).

Name of firm \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Website \_\_\_\_\_

Has your firm produced epoxy resins (as defined on next page) from non-epoxy resin material inputs and/or processed imported or purchased epoxy resins into another product that still matches the definition of epoxy resins (as defined on next page) in the United States at any time since January 1, 2021?

☐ **NO** (Sign the certification below and promptly return **only** this page of the questionnaire to the Commission)

☐ **YES** (Complete all parts of the questionnaire relevant to your firm's operations as detailed in question I-2a below, and return the entire questionnaire to the Commission)

Return questionnaire via the Commission's secure submission portal by clicking on the following link:

<https://www.usitc.gov/qportal> (PIN: **EPOXY**; PHASE: **FINAL**). See last page for detailed instructions.

#### CERTIFICATION

*I certify that the information herein supplied in response to this questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted is subject to audit and verification by the Commission. By means of this certification I also grant consent for the Commission, and its employees and contract personnel, to use the information provided in this questionnaire and throughout this proceeding in any other import-injury proceedings conducted by the Commission on the same or similar merchandise.*

*I, the undersigned, acknowledge that information submitted in response to this request for information and throughout this proceeding or other proceedings may be disclosed to and used: (i) by the Commission, its employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel, solely for cybersecurity purposes. I understand that all contract personnel will sign appropriate nondisclosure agreements.*

\_\_\_\_\_  
Name of Authorized Official

\_\_\_\_\_  
Title of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Phone

\_\_\_\_\_  
Email address

**PART I.—GENERAL INFORMATION**

**Background.**--This proceeding was instituted in response to petitions filed on April 3, 2024, by the U.S. Epoxy Resin Producers *Ad Hoc* Coalition, which is comprised of Olin Corporation, Clayton, Missouri, and Westlake Corporation, Houston, Texas. Countervailing and/or antidumping duties may be assessed on the subject imports as a result of these proceedings if the Commission makes an affirmative determination of injury, threat, or material retardation, and if the U.S. Department of Commerce (“Commerce”) makes an affirmative determination of subsidization and/or dumping. Pertinent information to this proceeding are available at:

- Questionnaires: [https://www.usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://www.usitc.gov/reports/active_import_injury_questionnaires).
- Other information: <https://ids.usitc.gov/case/8190/investigation/8552>.

**Epoxy resins.**—The merchandise subject to these investigations are fully or partially uncured epoxy resins, also known as epoxide resins, polyepoxides, oxirane resins, ethoxyline resins, diglycidyl ether of bisphenol, (chloromethyl)oxirane, or aromatic diglycidyl, which are polymers or prepolymers containing epoxy groups (i.e., three-membered ring structures comprised of two carbon atoms and one oxygen atom). Epoxy resins range in physical form from low viscosity liquids to solids. All epoxy resins are covered by the scope of these investigations irrespective of physical form, viscosity, grade, purity, molecular weight, or molecular structure, and packaging.

Epoxy resins may contain modifiers or additives, such as hardeners, curatives, colorants, pigments, diluents, solvents, thickeners, fillers, plasticizers, softeners, flame retardants, toughening agents, catalysts, Bisphenol F, and ultraviolet light inhibitors, so long as the modifier or additive has not chemically reacted so as to cure the epoxy resin or convert it into a different product no longer containing epoxy groups. Such epoxy resins with modifiers or additives are included in the scope where the epoxy resin component comprises no less than 30 percent of the total weight of the product. The scope also includes blends of epoxy resins with different types of epoxy resins, with or without the inclusion of modifiers and additives, so long as the combined epoxy resin component comprises at least 30 percent of the total weight of the blend.

Epoxy resins that enter as part of a system or kit with separately packaged co-reactants, such as hardeners or curing agents, are within the scope. The scope does not include any separately packaged co-reactants that would not fall within the scope if entered on their own.

The scope includes merchandise matching the above description that has been processed in a third country, including by commingling, diluting, introducing, or removing modifiers or additives, or performing any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the subject country.

The scope also includes epoxy resin that is commingled or blended with epoxy resin from sources not subject to these investigations. Only the subject component of such commingled products is covered by the scope of these investigations.

Excluded from the scope are phenoxy resins, which are polymers with a weight greater than 11,000 Daltons, a Melt Flow Index (MFI) at 200 °C (392 °F) no less than 4 grams and no greater than 70 grams per 10 min, Glass-Transition Temperatures (Tg) no less than 80 °C (176 °F) and no greater than 100 °C (212 °F), and which contain no epoxy groups other than at the terminal ends of the molecule.

Excluded from the scope are certain paint and coating products, which are blends, mixtures, or other formulations of epoxy resin, curing agent, and pigment, in any form, packaged in one or more containers, wherein (1) the pigment represents a minimum of 10 percent of the total weight of the product, (2) the epoxy resin represents a maximum of 80 percent of the total weight of the product, and (3) the curing agent represents 5 to 40 percent of the total weight of the product.

Excluded from the scope are preimpregnated fabrics or fibers, often referred to as “pre-pregs,” which are composite materials consisting of fabrics or fibers (typically carbon or glass) impregnated with epoxy resin.

This merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheading 3907.30.0000. Subject merchandise may also be imported under subheadings/statistical reporting numbers 3907.29.0000, 3824.99.9397, 3214.10.0020, 2910.90.9100, 2910.90.9000, 2910.90.2000, and 1518.00.4000. The HTSUS subheadings/statistical reporting numbers are provided for convenience and customs purposes only; the written description of the scope is dispositive.

**Quantity (1,000 pounds).**—Unless otherwise indicated please report quantities in thousands of pounds on a total weight basis (i.e., including the weight of the contained epoxy resin molecules as well as any other chemicals or molecules it is mixed with). In other words, if you shipped 560,110 pounds of epoxy resins in 2023, then in the relevant form field you should input 560.

**Reporting of information.**—If information is not readily available from your records, provide carefully prepared estimates. If your firm is completing more than one questionnaire (i.e., a producer, importer, and/or purchaser questionnaire), you need not respond to duplicated questions.

**Confidentiality.**—The commercial and financial data furnished in response to this questionnaire that reveal the individual operations of your firm will be treated as confidential by the Commission to the extent that such data are not otherwise available to the public and will not be disclosed except as may be required by law (see 19 U.S.C. § 1677f). Such confidential information will not be published in a manner that will reveal the individual operations of your firm; however, general characterizations of numerical business proprietary information (such as discussion of trends) will be treated as confidential business information only at the request of the submitter for good cause shown.

**Verification.**—The information submitted in this questionnaire is subject to audit and verification by the Commission. To facilitate possible verification of data, please keep all files, worksheets, and supporting documents used in the preparation of the questionnaire response. Please also retain a copy of the final document that you submit.

**Release of information.**—The information provided by your firm in response to this questionnaire, as well as any other business proprietary information submitted by your firm to the Commission in connection with this proceeding, may become subject to, and released under, the administrative protective order provisions of the Tariff Act of 1930 (19 U.S.C. § 1677f) and section 207.7 of the Commission's Rules of Practice and Procedure (19 CFR § 207.7). This means that certain lawyers and other authorized individuals may temporarily be given access to the information for use in connection with this proceeding or other import-injury proceedings conducted by the Commission on the same or similar merchandise; those individuals would be subject to severe penalties if the information were divulged to unauthorized individuals.

**D-GRIDS tool.**--The Commission has a tool that firms can use to move data from their own MS Excel compilation files into self-contained data tables within this MS Word questionnaire, thereby reducing the amount of cell-by-cell data entry that would be required to complete this form. This tool is a macro-enabled MS Excel file available for download from the Commission's generic questionnaires webpage ([https://www.usitc.gov/trade\\_remedy/question.htm](https://www.usitc.gov/trade_remedy/question.htm)) called the "D-GRIDs tool." Use of this tool to help your firm complete this questionnaire is optional. Firms opting to use the D-GRIDs tool to populate their data into this questionnaire will need the D-GRIDs specification sheet PDF file specific to this proceeding (available on the case page which is linked under the "Background" above) which includes the necessary references relating to this questionnaire, as well as the macro-enable MS Excel D-GRIDs tool itself from the generic questionnaires page. More detailed instructions on how to use the D-GRIDs tool are available within the D-GRIDs tool itself.

- I-1a. **Reporting requirements.**--Please report below the actual number of hours required and the cost to your firm of completing this questionnaire for use by the Office of Management and Budget.

Hours	Dollars

Public reporting burden for this questionnaire is estimated to average 55 hours per response, including the time for reviewing instructions, gathering data, and completing and reviewing the questionnaire.

We welcome comments regarding the accuracy of this burden estimate, suggestions for reducing the burden, and any suggestions for improving this questionnaire. Please provide such comments to the Office of Investigations, [import\\_injury@usitc.gov](mailto:import_injury@usitc.gov).

- I-1b. **TAA information release.**--In the event that the U.S. International Trade Commission (USITC) makes an affirmative final determination in this proceeding, do you consent to the USITC's release of your contact information (company name, address, contact person, contact person's title, telephone number, email address) appearing on the front page of this questionnaire to the Departments of Commerce, Labor, and Agriculture, as applicable, so that your firm and its workers can be made eligible for benefits under the Trade Adjustment Assistance program?

☐ Yes

☐ No

I-2a. **Type of operations.**--Please identify which type of operations your firm conducts below.

Type of operations	Description (check all that apply)	
<b>Production</b>	Your firm purchases or otherwise procures upstream out-of-scope chemical inputs for production and uses a primary chemical reaction <sup>1</sup> to synthesize the epoxy resins. Your firm may or may not also conduct further processing, including mixing or blending your own U.S.-produced epoxy resin with other chemicals or molecules.	<input type="checkbox"/>
<b>Processing</b>	Your firm purchases or otherwise procures in-scope epoxy resins from another entity (i.e., either domestically manufactured or imported epoxy resins), and your firm conducts further processing of those already in-scope epoxy resins into another form of in-scope product (including formulated epoxy resins) in the United States. Your firm may or may not conduct additional chemical reactions in these U.S. processing operations, but your firm is not creating domestically its own epoxy polymers via a chemical reaction.	<input type="checkbox"/>

<sup>1</sup> The primary chemical reaction is one that reacts two or more chemical compounds to yield an epoxy resin in its pure form (e.g., without additives). An example of a primary chemical reaction is reacting epichlorohydrin with bisphenol A to yield bisphenol A diglycidyl ether.

Note: If your firm both produces epoxy resins domestically (whether or not further processed) as well as processes imported or purchased epoxy resins (i.e., conduct activities on purchased epoxy resins that your firm itself has not chemically reacted to produce the epoxy polymers), please separately report on those operations. The following schematic reflect how the Commission is asking firms to report their operations in this questionnaire.

Item	Production operations with or without additional processing	Processing operations using purchased or imported epoxy resins inputs
Part I: General information	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Part II: Trade and related information	<input checked="" type="checkbox"/>	
Part III: Financial information	<input checked="" type="checkbox"/>	
Part IV: Pricing and market factors	<input checked="" type="checkbox"/>	
Part V: Production related activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Part VI: Processing operations		<input checked="" type="checkbox"/>

- I-2b. **Establishments covered.**--Provide the city, state, zip code, and brief description of each establishment covered by this questionnaire. **Firms operating more than one establishment should combine the data for all establishments into a single report.**

**“Establishment”**--Each facility of a firm involved in the production and/or processing of epoxy resins, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

Establishments covered <sup>1</sup>	City, State	Zip (5 digit)	Description	Production	Processing
1				<input type="checkbox"/>	<input type="checkbox"/>
2				<input type="checkbox"/>	<input type="checkbox"/>
3				<input type="checkbox"/>	<input type="checkbox"/>
4				<input type="checkbox"/>	<input type="checkbox"/>
5				<input type="checkbox"/>	<input type="checkbox"/>
6				<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Additional discussion on establishments consolidated in this questionnaire: _____.					

- I-2c. **Stock symbol information.**--If your firm or parent firm is publicly traded, please specify the stock exchange and trading symbol: \_\_\_\_\_.

- I-2d. **External counsel.**--If your firm or parent firm is represented by external counsel in relation to this proceeding, please specify the name of the law firm and the lead attorney(s).

Law firm:	
Lead attorney(s):	

I-3. **Petitioner status.**--Is your firm a petitioner in this proceeding or a member firm of the petitioning entity?

<b>No</b>	<b>Yes</b>
<input type="checkbox"/>	<input type="checkbox"/>

I-4. **Petition support.**--Does your firm support or oppose the petitions?

Country	Investigation type	Support	Oppose	Take no position
China	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
China	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
India	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South Korea	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	Countervailing duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Taiwan	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thailand	Antidumping duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I-5. **Ownership.**--Is your firm owned, in whole or in part, by any other firm?

☐ No      ☐ Yes--List the following information, relating to the ultimate parent/owner.

Firm name	Country	Extent of ownership (percent)

**“Related firm”** –A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

- I-6. **Related importers/exporters.**--Does your firm have any related firms, either domestic or foreign, that are engaged in importing epoxy resins from China, India, South Korea, Taiwan, and/or Thailand into the United States or that are engaged in exporting epoxy resins from China, India, South Korea, Taiwan, and/or Thailand to the United States?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation type <sup>1</sup>
<sup>1</sup> Please describe the nature of your affiliation, such as the type of relationship and include the share of ownership.		

- I-7. **Related producers.**--Does your firm have any related firms, either domestic or foreign, that are engaged in the production or processing of epoxy resins?

☐ No ☐ Yes--List the following information.

Firm name	Country	Affiliation type <sup>1</sup>
<sup>1</sup> Please describe the nature of your affiliation, such as the type of relationship and include the share of ownership.		



**PART II.--TRADE AND RELATED INFORMATION**

Further information on this part of the questionnaire can be obtained from Alejandro Orozco (202-205-3177, [Alejandro.Orozco@usitc.gov](mailto:Alejandro.Orozco@usitc.gov)).

- II-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part II.

Name	
Title	
Email	
Telephone	

- II-2a. **Changes in operations.**--Please indicate whether your firm has experienced any of the following changes in relation to the production of epoxy resins since January 1, 2021.

<i>Check as many as appropriate.</i>		<i>If checked, please describe the nature, timing / duration (specify the exact dates), and impact on operations of any such reported changes as well as the business reasons for them; leave completely blank if not applicable.</i>
<input type="checkbox"/>	Plant openings	
<input type="checkbox"/>	Plant closings	
<input type="checkbox"/>	Prolonged shutdowns	
<input type="checkbox"/>	Production curtailments	
<input type="checkbox"/>	Relocations	
<input type="checkbox"/>	Expansions	
<input type="checkbox"/>	Acquisitions	
<input type="checkbox"/>	Consolidations	
<input type="checkbox"/>	Weather-related or force majeure events (e.g., Winter Storm Uri, other winter storms/freezes , hurricanes, energy crises)	
<input type="checkbox"/>	Other (e.g., Build America Buy America Act, revised labor agreements, technology)	

- II-2b. **COVID-19 pandemic.**--Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your firm's supply chain arrangements, production, employment, and shipments relating to epoxy resins? In your response, please discuss the duration and timing of any such changes as they relate to your firm's operations.

No	Yes	If yes, describe these changes including the impact over time on the (a) supply chain, (b) production and shipments, and (c) employment with respect to epoxy resins.
<input type="checkbox"/>	<input type="checkbox"/>	

- II-3a. **Production using same machinery.**--Please report your firm's production of products using the same equipment, machinery, or employees as used to produce epoxy resins, and the combined capacity (both installed and practical capacity) on this shared equipment, machinery, or employees in the periods indicated.

***"Installed overall capacity"*** – The level of production that your establishment(s) could have attained, assuming your firm's *optimal* product mix, and based solely on *existing capital investments*, i.e., machinery and equipment that is in place and ready to operate. This capacity measure does not take into account other constraints to production such as existing workforce constraints, availability of raw materials, or downtime for maintenance, repair, and clean-up. This capacity measure is sometimes referred to as "nameplate" or "theoretical" capacity.

***"Practical overall capacity"*** – The level of production that your establishment(s) could reasonably have expected to attain, taking into account your firm's *actual* product mix over the period. This capacity measure is based on not only existing capital investments, i.e., machinery and equipment that is in place and ready to operate; but also non-capital investment constraints, such as (1) normal operating conditions, including normal downtime for maintenance, repair, and cleanup; (2) your firm's existing in place and readily available labor force; (3) availability of material inputs; and (4) any other constraints that may have limited your firm's ability to produce the reported products. Importantly, this capacity measure is the maximum "practical" production your firm could have achieved without hiring new personnel or expanding the number of shifts operated in the period.

***"Practical epoxy resins capacity"*** – The level of production of epoxy resins that your establishment(s) could reasonably have expected to attain. The same assumptions apply to this capacity measure as for practical overall capacity, but only includes the portion of practical overall capacity allocated to the production of epoxy resins based on the actual product mix experienced over the period.

***"Production"*** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

Takes into account	Installed overall capacity	Practical overall capacity	Practical epoxy resins capacity
Existing capital investments	Yes	Yes	Yes
Product mix	Yes	Yes	Yes
Normal downtime, maintenance, repair and clean-up	No	Yes	Yes
Existing labor force	No	Yes	Yes
Availability of material inputs	No	Yes	Yes
Actual number of shifts and hours operated	No	Yes	Yes
Limited to epoxy resins	No	No	Yes

II-3a. **Production using same machinery.--Continued**

Quantity (in 1,000 pounds)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Capacity measures:</b>					
<b>Installed overall capacity</b> <sup>1</sup>					
<b>Practical overall capacity</b> <sup>1,2</sup>					
<b>Practical epoxy resins capacity</b> <sup>3,4</sup>	0	0	0	0	0
<b>Production of:</b>					
Epoxy resins <sup>3,4</sup>	0	0	0	0	0
Other products <sup>5</sup>					
<b>Total production using same machinery or workers</b>	0	0	0	0	0
<p><sup>1</sup> Data reported for both "installed overall" and "practical overall" capacity should each individually be greater than data reported for total production (last line). Additionally, data reported for "installed overall" capacity should be greater than "practical overall" capacity in every period.</p> <p><sup>2</sup> Please provide details in your response to the question on capacity constraints in question II-3d below that explain the differences reported between "installed" overall capacity and "practical" overall capacity.</p> <p><sup>3</sup> Data for this indicator will populate here once reported below in question II-8.</p> <p><sup>4</sup> Data reported for practical epoxy resins capacity should be greater than the data reported for production of epoxy resins in each period, if not revise prior to submission to the Commission. Additionally, if your firm reports the production of no other products on the same machinery and using the same workers as epoxy resins then "practical overall" and "practical epoxy resins" capacity measures should be equal to each other.</p> <p><sup>5</sup> Please identify these products: _____.</p>					

- II-3b. **Operating parameters.**--The *practical* overall capacity reported in II-3a is based on the following operating parameters:

Hours per week	Weeks per year

- II-3c. **Capacity calculations.**--Please describe the methodology used to calculate *installed* and *practical* overall production capacities reported in II-3a, and explain any changes in reported capacities.

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- II-3d. **Practical overall capacity constraints.**--Please describe the constraint(s) that set the limit(s) on your firm's practical overall capacity over the period reported in question II-3a. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall capacity. If a constraint was not actually binding over the period reported, but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

Constraint (check as many as appropriate)		Description (If checked, please describe the details, timing, and duration of the constraint; leave completely blank if not applicable)
<input type="checkbox"/>	Production bottlenecks	
<input type="checkbox"/>	Existing labor force	
<input type="checkbox"/>	Supply of material inputs	
<input type="checkbox"/>	Fuel or energy	
<input type="checkbox"/>	Storage capacity	
<input type="checkbox"/>	Logistics/transportation	
<input type="checkbox"/>	Other constraints (list the specific constraints in the description field)	

- II-3e. **Reaching installed overall capacity.**--Please describe and quantify the amount of time it would take and the additional actions that would be needed (e.g., hiring new workers, expanding shifts, procuring larger sources of raw material supply, etc.) for your firm to be able to fully utilize the reported installed overall capacity reported in II-3a.

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- II-3f. **Excess capacity.**--To the extent that your company is reporting excess capacity, please report, with specificity: (1) which machines or equipment (or other elements of production) would need to be brought back into production for your plant to operate at full capacity, and (2) the specific dates on which such machines or equipment were last used by your plant to produce epoxy resins.

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- II-4. **Product shifting.**—

- (a) Is your firm able to switch production (capacity) between epoxy resins and other products using the same equipment and/or labor?

No	Yes	If yes—(i.e., have produced other products or are able to produce other products) Please identify other actual or potential products.
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) Please describe the factors that affect your firm's ability to shift capacity between products (e.g., time, cost, relative price change, etc.), and the degree to which these factors enhance or constrain such shifts.

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- II-5. **Capacity checklist.**--Please check that the capacity numbers reported in question II-3a follow the Commission's relevant definitions for capacity.

Item	✓ if Yes
Are all three capacity measures reported based on <u>currently installed machinery and equipment</u> (i.e., the reported capacity level would not require additional capital investments in order to achieve)?	<input type="checkbox"/>
Are practical overall capacity and practical epoxy resins capacity measures reported based on <u>existing labor force</u> (i.e., the reported capacity level would not require hiring additional production related workers or adding shifts)?	<input type="checkbox"/>
Are practical overall capacity and practical epoxy resins capacity measures based on <u>the actual availability of material inputs</u> ?	<input type="checkbox"/>
Do both practical overall capacity and practical epoxy resins capacity measures account for <u>normal downtime, maintenance, repair and clean-up</u> activities?	<input type="checkbox"/>
Does the difference between practical overall capacity and practical epoxy resins capacity equal the portion of practical overall capacity that is dedicated to the production of out-of-scope products?	<input type="checkbox"/>

Note: If your firm is not able to answer "yes" to any of the above criteria as it relates to your firm's reported capacity levels, please revise your capacity numbers to be in conformance with the appropriate definition prior to submission to the Commission.

- II-6. **Tolling.**--Since January 1, 2021, has your firm been involved in a toll agreement regarding the production of epoxy resins?

**"Toll agreement"**--Agreement between two firms whereby the first firm ("tollee") furnishes the raw materials and the second firm ("toller") uses the raw materials to produce a product that it then returns to the first firm with a charge for processing costs, overhead, etc.

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	If yes—Please complete the table below.

Does your firm act as the toller or tollee in this arrangement?	Toller: <input type="checkbox"/>	Tollee: <input type="checkbox"/>
Report the share of your firm's production of epoxy resins that was included in this toll arrangement in 2023.		%
Please describe the activities performed in this tolling arrangement:		
Please indicate the name(s) of the firm(s) involved:		

II-7. **Foreign trade zones.**--

- (a) **Firm's FTZ operations.**--Does your firm produce epoxy resins in and/or admit epoxy resins into a foreign trade zone (FTZ)?

**“Foreign trade zone”** is a designated location in the United States where firms utilize special procedures that allow delayed or reduced customs duty payments on foreign merchandise. A foreign trade zone must be designated as such pursuant to the rules and procedures set forth in the Foreign-Trade Zones Act.

No	Yes	If yes--Describe the nature of your firm's operations in FTZs and identify the specific FTZ site(s).
<input type="checkbox"/>	<input type="checkbox"/>	

- (b) **Other firms' FTZ operations.**--To your knowledge, do any firms in the United States import epoxy resins into a foreign trade zone (FTZ) for use in distribution of epoxy resins and/or the production of downstream articles?

No	Yes	If yes--Identify the firms and the FTZs.
<input type="checkbox"/>	<input type="checkbox"/>	



- II-8. **Production, shipment, and inventory data**--Report your firm's practical capacity, production, shipments and inventories of U.S-produced epoxy resins during the specified periods.

***“Production”*** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

***“Commercial U.S. shipments”*** –Shipments made within the United States as a result of an arm’s length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

***“Internal consumption”*** – Product consumed internally by your firm. Such transactions are valued at fair market value.

***“Transfers to related firms”*** –Shipments made to related firms. Such transactions are valued at fair market value.

***“Related firm”*** –A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

***“Export shipments”*** –Shipments to destinations outside the United States, including shipments to related firms.

***“Inventories”***— Finished goods inventory, not raw materials or work-in-progress.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.*

II-8. **Production, shipment, and inventory data.**--Continued

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Practical epoxy resins capacity<sup>1</sup></b> (quantity) (A)					
<b>Beginning-of-period inventories</b> (quantity) (B)					
<b>Production</b> (quantity) (C)					
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (D)					
Value (E)					
<b>Internal consumption:<sup>2</sup></b>					
Quantity (F)					
Value <sup>2</sup> (G)					
<b>Transfers to related firms:<sup>2</sup></b>					
Quantity (H)					
Value <sup>2</sup> (I)					
<b>Export shipments:<sup>3</sup></b>					
Quantity (J)					
Value (K)					
<b>End-of-period inventories</b> (quantity) (L)					
<sup>1</sup> Report your firm's practical epoxy resins capacity consistent with the definitions and instructions included in question II-3a. <sup>2</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): . However, the data provided above in this table should be based on fair market value. <sup>3</sup> Identify your firm's principal export markets: .					

**RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.**--Generally, the data reported for the end-of-period inventories (i.e., line L) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., line C), less total shipments (i.e., lines D, F, H, and J). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
B + C – D – F – H – J – L = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate: _____.					

- II-9. **Channels of distribution.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced epoxy resins by channel of distribution during the specific periods.

Quantity (in 1,000 pounds)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>U.S. shipments:</b>					
To distributors (M)					
To independent processors (e.g., blenders, formulators) (N)					
To end users <sup>1</sup> (O)					
<sup>1</sup> Please indicate what are top end use categories or types of end users for your firm's U.S. shipments of epoxy resins: . End users include entities that produce out-of-scope products from imported or purchased epoxy resins.					

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines M, N, and O) in each time period equal the quantity reported for U.S. shipments (i.e., line D, F, H) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
M + N + O – D – F – H = zero ("0"), if not revise.	0	0	0	0	0

- II-10. **U.S. shipments by product type and form.**--Please provide the quantity and value of your firm's U.S. shipments (inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of U.S.-produced epoxy resins in calendar year 2023 by product type and form.

Quantity (1,000 pounds) and Value (in \$1,000)		
Item	Calendar year 2023	
	Liquid / Solution	Solid / Semi-solid
<b>U.S. shipments:</b> <b>BADGE-type epoxy resins, bisphenol-F epoxy resins, epoxy solutions, and epoxy blends:</b> Quantity (P)		
Value (Q)		
<b>Brominated, novolac, cycloaliphatic and waterborne epoxy resins:</b> Quantity (R)		
Value (S)		
<b>Multifunctional, aliphatic, glycidyl amine, epoxy-functional modifiers, and all other epoxy resins:</b> Quantity (T)		
Value (U)		

**RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE AND FORM.**--Please ensure that the quantities and values reported for U.S. shipments by product type and form (i.e., lines P, R, S, U, V, and X) in 2023 equal the quantities and values reported for U.S. shipments (i.e., lines D through I) in 2023. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year
	2023
<b>Quantity:</b> P + R + T - D - F - H = zero ("0"), if not revise.	0
<b>Value:</b> Q + S + U - E - G - I = zero ("0"), if not revise.	0

- II-11. **Employment data.**--Report your firm's employment-related data in your U.S. establishments related to the production of epoxy resins and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods (January – September).

**"Hours worked"** includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

**"Wages paid"** --Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
Average number of PRWs ( <i>number</i> )					
Hours worked by PRWs ( <i>1,000 hours</i> )					
Wages paid to PRWs ( <i>\$1,000</i> )					

Explanation of trends:

- II-12. **Transfers to related firms.**--If your firm reported transfers to related firms in question II-8, please identify the firm(s) and indicate the nature of the relationship between your firm and the related firms (e.g., joint venture, wholly owned subsidiary), whether the transfers were priced at market value or by a non-market formula, whether your firm retained marketing rights to all transfers, and whether the related firms also processed inputs from sources other than your firm.

- II-13. **Purchases.**--Has your firm purchased epoxy resins produced in the United States or in other countries since January 1, 2021? (Do not include imports for which your firm was the importer of record. These should be reported in an importer questionnaire.)

**"Purchase"** – A transaction to buy product from a U.S. corporate entity such as another U.S. producer, a U.S. distributor, or a U.S. firm that has directly imported the product.

**"Import"** –A transaction to buy from a foreign supplier where your firm is the importer of record.

No	Yes	If yes--Report such purchases in the table below and explain the reasons for your firms' purchases.
<input type="checkbox"/>	<input type="checkbox"/>	

*Note:* If your firm served as the importer of record for any purchases from foreign suppliers, either for your own account or as a service for another entity, those purchases are to be considered "imports" not "purchases" and **should not** be included in the table below.

(Quantity in 1,000 pounds)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Purchases from U.S. importers of epoxy resins from—</b>					
China					
India					
South Korea					
Taiwan					
Thailand					
Subject sources	0	0	0	0	0
All other sources <sup>1</sup>					
<b>Purchases from domestic producers<sup>2</sup></b>					
<b>Purchases from other sources<sup>3</sup></b>					
<b>Purchases from all sources</b>	0	0	0	0	0
<sup>1</sup> Please list the name of the nonsubject importer(s) from which your firm purchased this product: _____. <sup>2</sup> Please list the name of the U.S. producer(s) from which your firm purchased this product: _____. <sup>3</sup> Please list the name of the firm(s) from which your firm purchased this product: _____.					

- II-14. **Purchases of imports from subject sources.**--If your firm reported purchases from U.S. importers of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand at any time since January 1, 2021, report those purchases by the individual importer of record and subject source.

## Purchases of subject imports

Quantity (in 1,000 pounds)						
Importer of record	Subject source	Calendar year			January-September	
		2021	2022	2023	2023	2024
<b>Grand total:</b>		0	0	0	0	0

**RECONCILIATION OF PURCHASES FROM SUBJECT SOURCES.**--Please ensure that the quantities reported for your firm's purchases of imports from subject sources reported in this question (i.e., "total purchases of imports from subject sources") in each time period equal the quantity reported for your firm's purchases from subject sources in each time period in the previous question. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
Purchases from subject sources in this table – purchases from subject sources in previous table = zero ("0"), if not revise.	0	0	0	0	0

II-15. **Imports.**--Since January 1, 2021, has your firm imported epoxy resins?

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	If yes-- <b><u>COMPLETE AND RETURN A U.S. IMPORTERS' QUESTIONNAIRE</u></b>

II-16. **Other explanations.**--If your firm would like to further explain a response to a question in Part II for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--



**PART III.--FINANCIAL INFORMATION**

Address questions on this part of the questionnaire to Jennifer Brinckhaus (20-205-3188, [jennifer.brinckhaus@usitc.gov](mailto:jennifer.brinckhaus@usitc.gov)).

III-1. **Contact information.**—Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part III.

Name	
Title	
Email	
Telephone	

III-2. **Accounting system.**—Briefly describe your firm's financial accounting system.

A.1. When does your firm's fiscal year end (month and day)? \_\_\_\_\_  
If your firm's fiscal year changed since January 1, 2021, explain below:

\_\_\_\_\_

A.2. Note: Calendar-year data are required for the annual-year financial data in this section (i.e., in questions III-9a, III-9d, III-12a, and III-13a). However, if providing this data on a calendar-year basis is unduly burdensome or provides results that are not reliable, fiscal-year based data are acceptable. Please indicate whether the results in this section are provided on a calendar-year basis (including firms with a calendar-year based fiscal year) or on a fiscal-year basis that does not align with the calendar year.

☐ Calendar-year basis      ☐ Fiscal-year basis (does not align with the calendar year)

B.1. Describe the lowest level of operations (e.g., plant, division, company-wide) for which financial statements are prepared that include epoxy resins:

\_\_\_\_\_

B.2. Does your firm prepare profit/loss statements for epoxy resins:

☐ Yes      ☐ No

B.3. Please indicate the type and frequency (if applicable) of financial statements prepared by your firm. Please check relevant items below.

Financial statements	Check all that apply	Frequency			
		Monthly	Quarterly	Semi-annually	Annually
Audited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unaudited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Annual reports	<input type="checkbox"/>				
SEC Forms 10-K / 10-Q	<input type="checkbox"/>				
SEC Form 20-F	<input type="checkbox"/>				
Other (specify): _____	<input type="checkbox"/>				

B.4. Please indicate the primary accounting basis used by your firm.

Accounting basis	Check one
U.S. GAAP	<input type="checkbox"/>
IFRS	<input type="checkbox"/>
Tax – cash	<input type="checkbox"/>
Tax – accrual	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>

III-3. **Cost accounting system.**—Briefly describe your firm's cost accounting system (e.g., standard cost, job order cost, etc.).

--

III-4. **Product listing.**—Please list the products your firm produces in the facilities in which it produces epoxy resins and provide the share of net sales accounted for by these products in 2023.

Products	Share of sales in 2023
Epoxy resins	%
	%
	%
	%
	%

- III-5. **Inputs from related suppliers.**—Does your firm purchase **inputs** (raw materials, labor, energy, or any services) used in the production of epoxy resins from any related suppliers (e.g., inclusive of transactions between related firms, divisions and/or other components within the same company)?

☐ Yes--Continue to question III-6. ☐ No--Continue to question III-8a.

- III-6. **Inputs from related suppliers.**—Please identify the inputs used in the production of epoxy resins that your firm purchases from related suppliers and that are reflected in question III-9a. For “Share of total COGS” please report this information by relevant input for 2023.

Input	Related supplier	Share of total COGS in 2023
		%
		%
		%
		%

- III-7a. **Valuation method used for inputs from related suppliers.**—Please indicate the purchase cost valuation method used for the inputs from related suppliers, as recorded in the company’s own accounting system. If the basis differs by input, please check all that apply and explain further in the narrative box.

Purchase cost valuation method	Check all that apply
Related supplier’s cost	<input type="checkbox"/>
Cost plus	<input type="checkbox"/>
Negotiated transfer price to approximate fair market value	<input type="checkbox"/>
Other (specify): _____	<input type="checkbox"/>
If the methods used differ by input, please describe:	

- III-7b. **Valuation method used for inputs from related suppliers.**—Please confirm that the inputs purchased from related suppliers, as identified in III-6, were reported in III-9a (financial results on epoxy resins) in a manner consistent with the firm’s accounting books and records.

Yes	No	If no—Provide an explanation and the valuation basis used for these inputs in question III-9a.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-8. **Cost assignment/allocation basis.**—Briefly describe the assignment/allocation bases used by your firm to assign the costs and expenses listed below for epoxy resins in the normal course of business and in the financial results reported in question III-9a (e.g., actual costs, standard costs, percentage of COGS, percentage of sales, etc.).

Cost/expense	Assignment/allocation bases used for epoxy resins—	
	In the normal course of business	In the financial results at III-9a
Raw materials		
Direct labor		
Other factory costs		
SG&A expenses		
Interest expense		
Other income/expenses		

III-9a. **Operations on epoxy resins.**—Report the revenue and related cost information requested below on the epoxy resins operations of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations. Do not report any revenue or cost data related to the resale of purchased product. Note: Table III-9a financial results should include all material non-recurring items (charges and/or gains) related to 2021 Winter Storm Uri/Texas Freeze.

**Net sales**—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

Note: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in Part II of this questionnaire (see question III-14 for a reconciliation grid).

**Internal consumption**—Product consumed internally by your firm. Report internal consumption at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Transfers to related firms**—Sales made to related firms. Report transfers to related firms at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Costs and expenses**—Include costs and expenses associated with all reported net sales (i.e., for both domestic and export commercial sales, internal consumption, and transfers to related firms). If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

**Inputs from related suppliers**—Any inputs purchased from related suppliers should be reported in a manner consistent with your firm's accounting books and records.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes epoxy resins, as well as specific statements and worksheets) used to compile these data.*

III-9a. Operations on epoxy resins.—Continued

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Net sales quantities:</b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b>					
Raw materials					
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>SG&amp;A expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense items					
All other income items					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0

- III-9b. **Financial data reconciliation.**-- Certain line items from question III-9a, including total net sales quantities and values, total COGS, gross profit (or loss), operating profit (or loss), and net income (or loss), have been calculated based on the data submitted for other line items. Are the data in these calculated line items correct according to your firm's financial records ignoring non-material differences that may arise due to rounding?

		<p><b>If no--</b>If the calculated line items do not show the correct data, please double check the feeder data for data entry errors and revise.</p> <p>Also, check signs accorded to the post operating income line items. The two expense line items should report positive numbers (i.e., expenses are positive, and incomes or reversals are negative in these lines – instances of the latter should be rare in these lines). The income line item should also, in most instances, be a positive number (i.e., income is positive, and expenses or reversals are negative in this line).</p> <p>If, after reviewing and potentially revising the feeder data your firm has provided, the differences between your records and the calculated line items persist, please identify and discuss the differences in the space below.</p>
<p><b>Yes</b></p> <p><input type="checkbox"/></p>	<p><b>No</b></p> <p><input type="checkbox"/></p>	

- III-9c. **Raw materials.**—Please report the share of total raw material costs in 2023 (reported in III-9a) for the following raw material inputs:

Input	Share of total raw material costs (percent)	Procurement method	
		Primarily produced by your firm	Primarily purchased by your firm
Bisphenol A		<input type="checkbox"/>	<input type="checkbox"/>
Epichlorohydrin		<input type="checkbox"/>	<input type="checkbox"/>
Other raw material inputs <sup>1</sup>		<input type="checkbox"/>	<input type="checkbox"/>
Total (should sum to 100 percent)	0.0		
<sup>1</sup> If there are notable or significant raw material inputs included within the “other material inputs” category, please list those here and provide the share of the total raw material costs for which they account:			

- III-9d. **Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question III-9a.

Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
Depreciation expense (in \$1,000)					

- III-9e. **Depreciation expense classification.**—Please indicate the line item(s) within question III-9a (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

--



III-10a. **Nonrecurring items (charges and gains) included in the epoxy resins financial results.**—Please report all material (significant) nonrecurring items (charges and gains) that are included in the reported results at question III-9a. If a nonrecurring item that is not product-specific was allocated to the results at question III-9a, please report the allocated value, below, rather than the aggregate amount. Note: Table III-9a financial results should include all material non-recurring items related to 2021 Winter Storm Uri/Texas Freeze. As applicable, separately report/specify the material non-recurring charges/expenses incurred due to Winter Storm Uri/Texas Freeze, as well as material non-recurring gains/income (e.g., insurance settlements) reported in other income or otherwise, included III-9a financial results.

Note: The Commission's objective here is to gather information on material (significant) nonrecurring items which impacted the reported financial results for epoxy resins in question III-9a.

Item		Calendar year			January-September	
		2021	2022	2023	2023	2024
		Value (\$1,000)				
Nonrecurring items specific to Winter Storm Uri/Texas Freeze	1					
	2					
	3					
	4					
Other nonrecurring item	5					
Other nonrecurring item	6					
Other nonrecurring item	7					
Other nonrecurring item	8					
Other nonrecurring item	9					

III-10b. **Nonrecurring items (charges and gains) included in the epoxy resins financial results.**—In this table, please provide a brief description of each nonrecurring item reported above and indicate the specific line item within question III-9a in which the nonrecurring item is classified.

Item		Description of the nonrecurring item	Location (i.e., line item) within question III-9a
Nonrecurring items specific to Winter Storm Uri/Texas Freeze	1		
	2		
	3		
	4		
Other nonrecurring item	5		
Other nonrecurring item	6		
Other nonrecurring item	7		
Other nonrecurring item	8		
Other nonrecurring item	9		

- III-11. **Classification of identified nonrecurring items (charges and gains) in the accounting books and records of the company.**—If non-recurring items were reported in question III-10 above, please identify where your company recorded these items in your accounting books and records in the normal course of business, just as responses to question III-10 identify the specific line items in question III-9a where these items are reported.

--

- III-12a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of epoxy resins. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for epoxy resins in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations used in question III-9a.

**Note:** Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to epoxy resins if these assets are also related to other products.

Value (in \$1,000)			
Item	Calendar year ended		
	2021	2022	2023
Total assets (net)			

- III-12b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

--

- III-13a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and research and development expenses for epoxy resins.

Value (in \$1,000)					
Item	Calendar years			January-September	
	2021	2022	2023	2023	2024
Capital expenditures					
R&D expenses					

III-13b. **Description of reported capital expenditures.**—Please describe the nature, focus, and significance of your firm's reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

III-13c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm's reported R&D expenses.

III-14a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question III-9a should reconcile with the total shipments reported in question II-8 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-year basis.

If the calculated fields below return values other than zero (i.e., "0") this indicates the total net sales quantities and values do not match the total shipments quantities and values.

Reconciliation	Calendar years			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> Trade data from question II-8 (lines D, F, H, and J) less financial total net sales quantity data from question III-9a, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question II-8 (lines E, G, I, and K) less financial total net sales value data from question III-9a, = zero ("0").	0	0	0	0	0

Is the financial data in question III-9a reported on a calendar-year basis?

☐ Yes— Complete question III-14b.

☐ No— Continue to question III-15.

III-14b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question III-9a reconcile with the data in question II-8 (i.e., the calculated fields are returning zeros in the table above) for all periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	

If your responses to any of the items in questions III-15, III-16, and III-17 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

III-15. **Effects of imports on investment.**—Since January 1, 2021, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

No	Yes	
<input type="checkbox"/>	<input type="checkbox"/>	<b>If yes, my firm has experienced actual negative effects as follows:</b>

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

- III-16. **Effects of imports on growth and development.**—Since January 1, 2021, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<b>If yes, my firm has experienced actual negative effects as follows:</b>

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

- III-17. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm anticipates negative effects as follows:</b>
<input type="checkbox"/>	<input type="checkbox"/>	

- III-18. **Effects on financial performance of COVID-19.**—Has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on epoxy resins as reported in question III-9a? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

No	Yes	If yes, please describe these effects.
<input type="checkbox"/>	<input type="checkbox"/>	

- III-19. **Other explanations.**—If your firm would like to further explain a response to a question in Part III for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

**PART IV.--PRICING AND MARKET FACTORS**

Further information on this part of the questionnaire can be obtained from Tana von Kessler (202-205-2389, [tana.vonkessler@usitc.gov](mailto:tana.vonkessler@usitc.gov)).

IV-1. **Contact information.**--Please identify the individual that Commission staff may contact regarding the confidential information submitted in Part IV.

Name	
Title	
Email	
Telephone	

**PRICE DATA**

IV-2. This question requests quarterly quantity and value data for your firm's commercial shipments to unrelated U.S. customers since January 1, 2021 of the following products produced by your firm.

**Product 1.**--Bisphenol A liquid epoxy resin, basic commodity grade (i.e., D.E.R. 331, EPON 828, KER 828, YD 128, NPES 128, BE-188, and SM 828), sold in bulk (ISO Tanks or Tank Truck).

**Product 2.**--Bisphenol A liquid epoxy resin, basic commodity grade (i.e., D.E.R. 331, EPON 828, KER 828, YD 128, NPES 128, BE-188, and SM 828), sold in packages (Totes, Intermediate Bulk Containers ("IBC's"), or drums).

**Product 3.**--Bisphenol A solid epoxy resin, Type 3, Epoxy Equivalent Weight ("EEW") based on solids range between 700-850 g/eq (i.e., D.E.R. 663U, D.E.R. 663UE, EPON 2003, KD 213, KD 243C, KER 3033, NPES 903H, BE 503, YD 903).

**Product 4.**--Bisphenol A solid epoxy resin, Type 4, Epoxy Equivalent Weight ("EEW") based on solids range between 800-1,000 g/eq (i.e., D.E.R. 664UE, EPON 2004, KD 214L, NPES 904H, BE 504H).

Please note that values should be **f.o.b., U.S. point of shipment** and should remove any U.S.-inland transportation costs. Values should reflect the **final net** amount paid to your firm (i.e., should be net of all deductions for discounts or rebates).

IV-2a. During January 2021-September 2024, did your firm produce and sell to unrelated U.S. customers any of the above listed products (or any products that were competitive with these products)?

<input type="checkbox"/>	<b>Yes.</b> --Please complete the following pricing data table as appropriate.
<input type="checkbox"/>	<b>No.</b> --Skip to question IV-3.

IV-2b. **Price data.**--Report below the quarterly price data<sup>1</sup> for pricing products<sup>2</sup> produced and sold by your firm.

Report data in **actual pounds** and **actual dollars** (not 1,000s).

(Quantity in pounds, value in dollars)								
Period of shipment	Product 1		Product 2		Product 3		Product 4	
	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
<b>2021:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2022:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2023:</b>								
January-March								
April-June								
July-September								
October-December								
<b>2024:</b>								
January-March								
April-June								
July-September								

<sup>1</sup> Net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods), f.o.b. your firm's U.S. point of shipment. Please subtract any discounts, rebates, and returns from the quarter in which the sale occurred.

<sup>2</sup> Pricing product definitions are provided on the first page of Part IV.

**Note.**--If your firm's product does not exactly meet the product specifications but is competitive with the specified product, provide a description of your firm's product. Also, please explain any anomalies in your firm's reported pricing data.

Product 1:

Product 2:

Product 3:

Product 4:



IV-2c. **Price data checklist.**--Please check that the pricing data in question IV-2(b) have been correctly reported.

Are the price data reported above:	<b>✓ if Yes</b>
In actual dollars ( <b>not</b> \$1,000) and actual pounds ( <b>not</b> 1,000 pounds)?	<input type="checkbox"/>
Valued f.o.b. U.S. point of shipment (i.e., exclude U.S. inland transportation costs)?	<input type="checkbox"/>
Reported net of all discounts, rebates, and returns (deducted from the quarter in which the original sale occurred)?	<input type="checkbox"/>
Reported for commercial U.S. shipments only (i.e., exclude internal consumption, transfers, and exports)?	<input type="checkbox"/>
Less than or equal to the quantities and values reported in part II for commercial U.S. shipments in each period?	<input type="checkbox"/>
Explanation(s) for any boxes not checked:	

IV-2d. **Pricing data methodology.**--Please describe the method and the kinds of documents/records that were used to compile your price data.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the price data, as Commission staff may contact your firm regarding questions on the price data. The Commission may also request that your company submit copies of the supporting documents/records (such as sales journal, invoices, etc.) used to compile these data.*

IV-3. **Price setting.**--How does your firm determine the prices that it charges for sales of epoxy resins (check all that apply)?

Transaction by transaction	Contracts	Set price lists	Other	If other, describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-4. **Discount policy.**--Please indicate and describe your firm's discount policies (check all that apply).

Quantity discounts	Annual total volume discounts	No discount policy	Other	Describe
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-5. **Pricing terms.**--On what basis are your firm's prices of domestic epoxy resins usually quoted (check one)?

Delivered	F.o.b.	If f.o.b., specify point
<input type="checkbox"/>	<input type="checkbox"/>	

IV-6. **Contract versus spot.**--Approximately what shares of your firm's sales of its U.S.-produced epoxy resins in 2023 were on the basis of (1) short-term contracts, (2) annual contracts, (3) long-term contracts, and (4) spot sales?

Item	Type of sale				Total (should sum to 100.0%)
	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)	Spot sales (for a single delivery)	
Share of 2023 sales	%	%	%	%	0.0 %

- IV-7. **Contract provisions.**--Please fill out the table regarding your firm's typical sales contracts for U.S.-produced epoxy resins (or check "not applicable" if your firm does not sell on a short-term, annual and/or long-term contract basis).

Typical sales contract provisions	Item	Short-term contracts (multiple deliveries for less than 12 months)	Annual contracts (multiple deliveries for 12 months)	Long-term contracts (multiple deliveries for more than 12 months)
Average contract duration	No. of days		365	
Price renegotiation (during contract period)	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fixed quantity and/or price	Quantity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Price	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indexed to raw material costs <sup>1</sup>	Yes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<sup>1</sup> Please identify the indexes used: _____.				

- IV-8. **Lead times.**--What share of your firm's sales of its U.S.-produced epoxy resins were from inventory and produced to order in 2023, and what was the typical lead time between a customer's order and the date of delivery for your firm's sales of its U.S.-produced epoxy resins?

Source	Share of 2023 sales	Lead time (Average number of days)
From inventory	%	
Produced to order	%	
<b>Total</b> (should sum to 100.0%)	0.0 %	

IV-9. **Shipping information.**--

- (a) Who generally arranges the transportation to your firm's customers' locations?  
☐ Your firm    ☐ Purchaser (*check one*)
- (b) Indicate the approximate percentage of your firm's sales of epoxy resins that are delivered the following distances from its production facility.

Distance from production facility	Share
Within 100 miles	%
101 to 1,000 miles	%
Over 1,000 miles	%
<b>Total</b> (should sum to 100.0%)	0.0 %

- IV-10. **Geographical shipments.**--In which U.S. geographic market area(s) has your firm sold its U.S.-produced epoxy resins since January 1, 2021 (check all that apply)?

Geographic area	✓ if applicable
<b>Northeast.</b> --CT, ME, MA, NH, NJ, NY, PA, RI, and VT.	<input type="checkbox"/>
<b>Midwest.</b> --IL, IN, IA, KS, MI, MN, MO, NE, ND, OH, SD, and WI.	<input type="checkbox"/>
<b>Southeast.</b> --AL, DE, DC, FL, GA, KY, MD, MS, NC, SC, TN, VA, and WV.	<input type="checkbox"/>
<b>Central Southwest.</b> --AR, LA, OK, and TX.	<input type="checkbox"/>
<b>Mountains.</b> --AZ, CO, ID, MT, NV, NM, UT, and WY.	<input type="checkbox"/>
<b>Pacific Coast.</b> --CA, OR, and WA.	<input type="checkbox"/>
<b>Other.</b> --All other markets in the United States not previously listed, including AK, HI, PR, and VI.	<input type="checkbox"/>

- IV-11. **Inland transportation costs.**—What is the approximate percentage of the cost of U.S.-produced epoxy resins that is accounted for by U.S. inland transportation costs? \_\_\_\_\_ percent

IV-12. **End uses.**--List the end uses of the epoxy resins that your firm manufactures. For each end-use product, what percentage of the total cost is accounted for by epoxy resins and other inputs?

End-use product	Share of total cost of end use product accounted for by		Total (should sum to 100.0% across)
	Epoxy resins	Other inputs	
	%	%	0.0 %
	%	%	0.0 %
	%	%	0.0 %

IV-13. **Substitutes.**--Can other products be substituted for epoxy resins?

☐ No                      ☐ Yes--Please fill out the table.

Substitute	End use in which this substitute is used	Have changes in the price of this substitute affected the price for epoxy resins?		
		No	Yes	Explanation
1.		<input type="checkbox"/>	<input type="checkbox"/>	
2.		<input type="checkbox"/>	<input type="checkbox"/>	
3.		<input type="checkbox"/>	<input type="checkbox"/>	

IV-14. **Demand trends.**-- Has demand within the United States and outside of the United States (if known) for epoxy resins steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021? Explain any trends and describe the principal factors that have affected these changes in demand.

Select one box per row.

Market	Steadily increase	Fluctuate higher	No change	Fluctuate lower	Steadily decrease	Explanation and factors
Within the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside the United States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- IV-15. **Product changes.**--Have there been any significant changes in the product range, product mix, or marketing of epoxy resins since January 1, 2021?

No	Yes	If yes, please describe and quantify if possible.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-16. **Business cycles.**--Is the market for epoxy resins subject to business cycles, either during the year or across years? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

- IV-17. **Conditions of competition.**--Is the market for epoxy resins subject to conditions of competition distinctive to epoxy resins other than the business cycles described in the previous question? If yes, describe.

No	Yes	If yes, please describe, including any changes since January 1, 2021.
<input type="checkbox"/>	<input type="checkbox"/>	

IV-18. **Supply constraints.**—

- (a) Has your firm refused, declined, or been unable to supply epoxy resins at any time since January 1, 2021 (examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, impact from changes in operations listed in II-2a, etc.)?

No (skip to IV-19)	Yes (respond to part b)
<input type="checkbox"/>	<input type="checkbox"/>

- (b) For each year that your firm faced supply constraints, describe the constraints with the details requested below.

Period	Description: include the timing, duration, and reason for the constraint.
2021	
2022	
2023	
January 1- April 3, 2024	
Since April 3, 2024	

- IV-19. **Raw materials.**--Have epoxy resins raw material prices steadily increased, fluctuated but ended higher, not changed, fluctuated but ended lower, or steadily decreased since January 1, 2021?

Select one box per row.

Steadily increase	Fluctuate higher	No change	Fluctuate lower	Steadily decrease	Explain, noting how raw material price changes have affected your firm's selling prices for epoxy resins.
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IV-20. **Interchangeability.**—How often are epoxy resins produced in the United States and in other countries interchangeable (i.e., are they used in the same applications for the same types of customers' needs)?

Please indicate A, F, S, N, or O in the table below:

A = the products from a specified country-pair are *always* interchangeable

F = the products are *frequently* interchangeable

S = the products are *sometimes* interchangeable

N = the products are *never* interchangeable

0 = *no familiarity* with products from a specified country-pair

Country-pair	China	India	South Korea	Taiwan	Thailand	Other countries
United States						
China						
India						
South Korea						
Taiwan						
Thailand						

For any country-pair producing epoxy resins that is *sometimes* or *never* interchangeable, identify the country-pair and explain the factors that limit or preclude the interchangeable use of epoxy resins produced in the countries:



- IV-21. **Factors other than price.**—How often are differences other than price (e.g., quality, availability, transportation network, product range, technical support, *etc.*) between epoxy resins produced in the United States and in other countries a significant factor in your firm's sales of the products?

Please indicate A, F, S, N, or O in the table below:

A = such differences are *always* significant

F = such differences are *frequently* significant

S = such differences are *sometimes* significant

N = such differences are *never* significant

O = *no familiarity* with products from a specified country-pair

Country-pair	China	India	South Korea	Taiwan	Thailand	Other countries
United States						
China						
India						
South Korea						
Taiwan						
Thailand						

For any country-pair for which factors other than price are *always* or *frequently* a significant factor in your firm's sales of epoxy resins, identify the country-pair and the relevant factors other than price, and report the advantages or disadvantages imparted by such factors:

- IV-22. **Role of section 301 tariffs.**-- Did the tariffs on Chinese-origin products under section 301, or changes in these tariffs, have an impact on the market for epoxy resins in the United States, including any effects on epoxy resins' cost, price, supply, and/or demand, since January 1, 2021?

Yes	No	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>If yes, please describe the impact on cost, price, supply, and/or demand, and include the timing of such impacts.</b>

IV-23. **Customer identification.**--List the names and contact information for your firm's 10 largest U.S. customers for epoxy resins since January 1, 2021. Indicate the share of the quantity of your firm's U.S. shipments of epoxy resins that each of these customers accounted for in 2023.

Customer's name		Contact person	Email	Telephone	City	State	Share of 2023 sales (%)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

IV-24. **Competition from imports.--**

- (a) **Lost revenue.**--Since January 1, 2021: To avoid losing sales to competitors selling epoxy resins from China, India, South Korea, Taiwan, and/or Thailand, did your firm:

Item	No	Yes
Reduce prices	<input type="checkbox"/>	<input type="checkbox"/>
Roll back announced price increases	<input type="checkbox"/>	<input type="checkbox"/>

- (b) **Lost sales.**--Since January 1, 2021: Did your firm lose sales of epoxy resins to imports of this product from China, India, South Korea, Taiwan, and/or Thailand?

No	Yes
<input type="checkbox"/>	<input type="checkbox"/>

- IV-25. **Other explanations.**--If your firm would like to further explain a response to a question in Part IV for which a narrative response box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

--

**PART V.--SUFFICIENT PRODUCTION RELATED ACTIVITIES**

Further information on this part of the questionnaire can be obtained from Alejandro Orozco (202-205-3177, [Alejandro.Orozco@usitc.gov](mailto:Alejandro.Orozco@usitc.gov)).

- V-1. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part V.

Name	
Title	
Email	
Telephone	

- V-2. **Explanation of firm's domestic activities.**--Please describe in detail your firm's domestic production operations relating to epoxy resins, including, if applicable, incorporation of imported or purchased epoxy resins, either domestic or imported, that is processed/converted into another in-scope form of epoxy resins in the United States prior to commercial sale.

--

- V-3. **Domestic activities by factor.**--Please describe the nature and extent of the following items in relation to your firm's U.S. production of epoxy resins in the United States.

Capital investments	
Technical expertise	
Value added	
Employment	
Quantity, type, and source of parts	
Costs and activities	

- V-4. **Operations' complexity and importance.**--On a scale of 1 to 5, please provide your firm's subjective opinion as to the complexity, intensity, and importance of your firm's epoxy resins operations conducted in the United States, with 1 being minimally complex, intense, or important and 5 being extremely complex, intense, or important.

<b>1:</b> <b>Minimally complex, intense, or important</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5:</b> <b>Extremely complex, intense, or important</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Please describe the reason for your rating.</b>				

- V-5. **Greenfield capital investment costs.**--Indicate the estimated amount of capital investment that would be required today on a greenfield basis to replicate your firm's current epoxy resins operations.

Item	Value (in \$1,000)
Estimated greenfield capital investment cost of current U.S. epoxy resins operations	

- V-6. **Top three epoxy resin products using purchased/imported epoxy resins.**--If your firm purchased and/or imported an in-scope epoxy resins product, processed that product domestically in the United States, and sold that further processed product that still matches the definition of epoxy resins (see p. 2), please list the top three epoxy resin products your firm sold, provide an indication of their formulation(s), and describe how those products are marketed in the United States.

<b>Not applicable</b>	<b>Yes applicable</b>	<b>If yes, please list the top three epoxy resin products your firm sold, provide an indication of their formulation(s), list the inputs (raw materials), and describe how those products are marketed in the United States.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

**PART VI.—PROCESSING OPERATIONS**

Further information on this part of the questionnaire can be obtained from Alejandro Orozco (202-205-3177, [Alejandro.Orozco@usitc.gov](mailto:Alejandro.Orozco@usitc.gov)).

- VI-1a. **Contact information.**--Please identify the responsible individual and the manner by which Commission staff may contact that individual regarding the confidential information submitted in Part VI.

Name	
Title	
Email	
Telephone	

- VI-1b. **Processing activities.**--Did your firm process both in-scope epoxy resins and out-of-scope epoxy resins (e.g., cured resins, formulation or blends with less than 30 percent epoxy polymers, et cetera)?

		<b>If yes, please ensure you only include data on those operations that result in an end product that your firm sells that still matches the definition of epoxy resins (i.e., is still in-scope), and explain here how your firm allocated any of its data from its overall operations to just the in-scope portion of its operations for the information reported in this part of the questionnaire.</b>
<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-1c. **Curing activities.**--Does your firm cure any of its purchased and/or imported epoxy resins?

**“Curing”**—Curing refers to activities that include mixing the epoxy resin and hardener for two-part system epoxy resins. Curing is a chemical reaction that transforms the combined liquid ingredients into a solid. As it cures, the epoxy passes from the liquid state, through a gel state, before it reaches a solid-state. The time it takes to cure is variable.

<b>No</b>	<b>Yes</b>	<b>If yes, please do not report your firm’s production activities in this section relating to curing (i.e., out-of-scope) epoxy resins.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

VI-2. **Production, shipment, and inventory data for processing activities.** – Report your firm's practical capacity, production, shipments, and inventories related to the processing of epoxy resins in its U.S. establishment(s) using imported and/or domestically purchased epoxy resins during the specified periods.

***"Production"*** – All production in your U.S. establishment(s), including production consumed internally within your firm and production for another firm under a toll agreement.

***"Commercial U.S. shipments"*** – Shipments made within the United States as a result of an arm's length commercial transaction in the ordinary course of business. Report net values (i.e., gross sales values less all discounts, allowances, rebates, prepaid freight, and the value of returned goods) in U.S. dollars, f.o.b. your point of shipment.

***"Internal consumption/ including product shipped to firm's own retail establishments"*** – Product consumed internally by your firm, which includes merchandise that your firm transferred to your own firm's retail establishments (i.e., shipped to either a bricks-and-mortar store or to an online order fulfillment center). Such transactions are to be valued at fair market value and not the total value of final downstream processed merchandise in the case of internal consumption, nor the retail sale value in the case of your firm owning and operating its own retail establishments or using a third-party fulfillment center to place retail level sales.

***"Transfers to related firms"*** – Shipments made to related firms. Such transactions are valued at fair market value.

***"Related firm"*** – A firm that your firm solely or jointly owned, managed, or otherwise controlled; a firm that solely or jointly owned, managed, or otherwise controlled your firm; and/or a firm that was solely or jointly owned, managed, or otherwise controlled by a firm that also solely or jointly owned, managed, or otherwise controlled your firm.

***"Export shipments"*** – Shipments to destinations outside the United States, including shipments to related firms.

***"Inventories"*** – Finished goods inventory, not raw materials or work-in-progress.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the trade data, as Commission staff may contact your firm regarding questions on the trade data. The Commission may also request that your company submit copies of the supporting documents/records (such as production and sales schedules, inventory records, etc.) used to compile these data.*

VI-2. Production, shipment, and inventory data for processing activities.--Continued

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Practical processing capacity<sup>1</sup></b> (quantity) (A)					
<b>Beginning-of-period inventories</b> (quantity) (B)					
<b>Production (processing).—</b> Using purchased domestic epoxy resins (quantity) (C)					
Using purchased/imported epoxy resins from subject sources <sup>2</sup> (quantity) (D)					
Using purchased/imported epoxy resins from nonsubject sources <sup>3</sup> (quantity) (E)					
Total production (processing) (quantity)	0	0	0	0	0
<b>U.S. shipments:</b>					
<b>Commercial shipments:</b>					
Quantity (F)					
Value (G)					
<b>Internal consumption:<sup>4</sup></b>					
Quantity (H)					
Value <sup>4</sup> (I)					
<b>Transfers to related firms:<sup>4</sup></b>					
Quantity (J)					
Value <sup>4</sup> (K)					
<b>Export shipments:<sup>5</sup></b>					
Quantity (L)					
Value (M)					
<b>End-of-period inventories (quantity)</b> (N)					

<sup>1</sup> Report you firm's practical epoxy resins processing capacity consistent with the definitions and instruction for practical capacity included in question II-3a above. This practical processing capacity is based on operating \_\_\_ hours per week, \_\_\_ weeks per year. Please describe the methodology used to calculate practical processing capacity, and explain any changes in reported capacity \_\_\_\_.

<sup>2</sup> Please identify the subject sources: \_\_\_\_.

<sup>3</sup> Please identify the nonsubject sources: \_\_\_\_.

<sup>4</sup> Internal consumption and transfers to related firms must be valued at fair market value. If your firm uses a different basis for valuing these transactions in your records, please specify that basis (e.g., cost, cost plus, etc.): \_\_\_\_\_. However, the data provided above in this table should be based on fair market value.

<sup>5</sup> Identify your firm's principal export markets: \_\_\_\_.



VI-2. **Production, shipment, and inventory data for processing activities.—Continued**

**RECONCILIATION OF SHIPMENTS, PRODUCTION, AND INVENTORY.**--Generally, the data reported for the end-of-period inventories (i.e., line N) should be equal to the beginning-of-period inventories (i.e., line B), plus production (i.e., lines C, D, and E), less total shipments (i.e., lines F, H, J, and L). Please ensure that any differences are not due to data entry errors in completing this form, but rather reflect your firm's actual records; and also provide explanations for any differences (e.g., theft, loss, damage, record systems issues, etc.) if they exist.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> B + C + D + E – F – H – J – L – N = should equal zero ("0") or provide an explanation. <sup>1</sup>	0	0	0	0	0
<sup>1</sup> Explanation if the calculated fields above are returning values other than zero (i.e., "0") but are nonetheless accurate:_____.					

VI-3. **Channels of distribution for processing activities.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of processed epoxy resins made from imported and/or domestically purchased epoxy resins by channel of distribution in the specified periods.

Quantity (in 1,000 pounds)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Channels of distribution:</b>					
<b>U.S. shipments:</b>					
to Distributors (O)					
to Other independent processors (P)					
to End users (Q) <sup>1</sup>					
<sup>1</sup> Please indicate what are top end use categories or types of end users for your firm's U.S. shipments of epoxy resins: . End users include entities that produce out-of-scope products from imported or purchased epoxy resins.					

**RECONCILIATION OF CHANNELS.**--Please ensure that the quantities reported for channels of distribution (i.e., lines O, P, and Q) in each time period equal the quantity reported for U.S. shipments (i.e., lines F, H, and J) in each time period. If the calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> O + P + Q – F – H – J = zero ("0"), if not revise.	0	0	0	0	0

- VI-4. **U.S. shipments by type and form for processed activities.**--Report your firm's U.S. shipments (i.e., inclusive of commercial U.S. shipments, internal consumption, and transfers to related firms) of processed epoxy resins made from imported and/or domestically purchased epoxy resins in 2023 by product type and form.

Quantity (1,000 pounds) and Value (in \$1,000)		
Item	Calendar year 2023	
	Liquid / Solution	Solid / Semi-solid
<b>U.S. shipments:</b> <b>BADGE-type epoxy resins, bisphenol-F epoxy resins, epoxy solutions, and epoxy blends:</b> Quantity (R)		
Value (S)		
<b>Brominated, novolac, cycloaliphatic and waterborne epoxy resins:</b> Quantity (T)		
Value (U)		
<b>Multifunctional, aliphatic, glycidyl amine, epoxy-functional modifiers and all other epoxy resins:</b> Quantity (V)		
Value (W)		

**RECONCILIATION OF U.S. SHIPMENTS BY PRODUCT TYPE.**—Please ensure that the quantities reported in this question (i.e. lines O through V across all columns) equal the quantity and value reported for U.S. shipments (i.e. lines D through I) for 2023 in question VI-2. If calculated fields below return values other than zero (i.e., "0"), the data reported must be revised prior to submission to the Commission.

Reconciliation	Calendar year 2023
<b>Quantity:</b> $R + T + V - F - H - J = \text{zero ("0")}$ , if not revise.	0
<b>Value:</b> $S + U + W - G - I - K = \text{zero ("0")}$ , if not revise.	0

- VI-5. **Employment data for processing activities.**--Report your firm's employment-related data related to the processing of epoxy resins in your U.S. establishments and provide an explanation for any trends in these data.

**"Production and Related Workers" (PRWs)** includes working supervisors and all nonsupervisory workers (including group leaders and trainees) engaged in fabricating, processing, assembling, inspecting, receiving, storage, handling, packing, warehousing, shipping, trucking, hauling, maintenance, repair, janitorial and guard services, product development, auxiliary production for plant's own use (e.g., power plant), recordkeeping, and other services closely associated with the above production operations.

Average number employed may be computed by adding the number of employees, both full time and part time, for the 12 pay periods ending closest to the 15th of the month and divide that total by 12. For the January to September periods, calculate similarly and divide by 9.

If your firm had the same number of PRWs in all calendar year and had not experienced any changes in PRWs in the most recent interim period, you would have the same number of PRWs for the interim periods (January – September).

**"Hours worked"** includes time paid for sick leave, holidays, and vacation time. Include overtime hours actually worked; do not convert overtime pay to its equivalent in straight time hours.

**"Wages paid"** – Total wages paid before deductions of any kind (e.g., withholding taxes, old-age and unemployment insurance, group insurance, union dues, bonds, etc.). Include wages paid directly by your firm for overtime, holidays, vacations, and sick leave.

Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
Average number of PRWs ( <i>number</i> )					
Hours worked by PRWs ( <i>1,000 hours</i> )					
Wages paid to PRWs ( <i>\$1,000</i> )					

Explanation of trends:

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- VI-6. **Operations on processing activities.**—Report the revenue and related cost information requested below on the processing of epoxy resins of your firm's U.S. establishment(s). Include only sales (whether domestic or exports) and costs related to your U.S. manufacturing operations. Do not report any revenue or cost data related to the resale of purchased product.

**Net sales**—Report all commercial sales, internal consumption, and transfers to related firms, whether these are domestic sales or exports. Report net sales values less discounts, returns, allowances, and prepaid freight, in U.S. dollars, f.o.b. your point of shipment. The freight costs associated with delivering the product to your customer should not be included.

Note: If the financial data are reported on a calendar-year basis, the total net sales quantities and values should match the total shipment quantities and values reported in this section of the questionnaire (see question VI-10a for a reconciliation grid).

**Internal consumption**—Product consumed internally by your firm. Report internal consumption at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Transfers to related firms**—Sales made to related firms. Report transfers to related firms at fair market value even if this is not how these transactions are valued in your own books and records. This would commonly be estimated based on the company's commercial sales of similar product or market knowledge.

**Costs and expenses**—Include costs and expenses associated with all reported net sales (i.e., for both domestic and export commercial sales, internal consumption, and transfers to related firms). If any freight costs were removed from net sales values, ensure the associated costs are removed from the applicable cost/expense line.

**Inputs from related suppliers**—Any inputs purchased from related suppliers should be reported in a manner consistent with your firm's accounting books and records.

*Note: As requested in Part I of this questionnaire, please keep all supporting documents/records used in the preparation of the financial data, as Commission staff may contact your firm regarding questions on the financial data. The Commission may also request that your company submit copies of the supporting documents/records (financial statements, including internal profit-and-loss statements for the division or product group that includes processing of epoxy resins, as well as specific statements and worksheets) used to compile these data.*

VI-6. **Operations on processing activities.**—*Continued*

Quantity (in 1,000 pounds) and value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Net sales quantities:</b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales quantities	0	0	0	0	0
<b>Net sales values:</b>					
Commercial sales					
Internal consumption					
Transfers to related firms					
Total net sales values	0	0	0	0	0
<b>Cost of goods sold (COGS):</b>					
Epoxy resins.—					
Domestically manufactured					
Subject sources <sup>1</sup>					
Nonsubject sources <sup>1</sup>					
All other raw materials <sup>2</sup>					
Total raw material costs	0	0	0	0	0
Direct labor					
Other factory costs					
Total COGS	0	0	0	0	0
<b>Gross profit or (loss)</b>	0	0	0	0	0
<b>SG&amp;A expenses</b>					
<b>Operating income (loss)</b>	0	0	0	0	0
<b>Other expenses and income:</b>					
Interest expense					
All other expense items					
All other income items					
<b>Net income or (loss) before income taxes</b>	0	0	0	0	0

<sup>1</sup> In the space provided please identify the relevant subject and nonsubject source countries (subject: \_\_\_\_\_ and nonsubject: \_\_\_\_\_).

<sup>2</sup> If there are notable or significant raw material inputs included within the “All other materials” category, please list those here and provide the share of total raw material costs for which they account: \_\_\_\_\_.

- VI-7a. **Depreciation expense.**—Please report the amount of depreciation expense that is included within the reported financial results at question VI-6.

Item	Calendar year			January-September	
	2021	2022	2023	2023	2024
Depreciation expense (in \$1,000)					

- VI-7b. **Depreciation expense classification.**—Please indicate the line item(s) within question VI-6 (e.g., other factory costs, SG&A expenses, etc.) that include the depreciation expense reported above.

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- VI-8a. **Asset values.**—Report the total assets (i.e., both current and long-term assets) associated with the production, warehousing, and sale of processed epoxy resins. If your firm does not maintain some or all of the specific asset information necessary to calculate total assets for processed epoxy resins in the normal course of business, please estimate this information based upon a method (such as production, sales, or costs) that is consistent with relevant cost allocations used in question VI-6.

**Note:** Total assets should reflect the net amount of assets (i.e., after any accumulated depreciation and allowances deducted) and should be allocated to processed epoxy resins if these assets are also related to other products.

Value (in \$1,000)			
Item	Calendar year ended		
	2021	2022	2023
Total assets (net)			

- VI-8b. **Description of asset values.**—Please provide explanations for any substantial changes in total asset value during the period; e.g., due to write-offs, major purchases, and revaluations. Also describe the main asset categories (both current and long-term) included in the above response.

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- VI-9a. **Capital expenditures and research and development (“R&D”) expenses.**—Report your firm’s capital expenditures and research and development expenses related to its processing of epoxy resins.

Value (in \$1,000)					
Item	Calendar year			January-September	
	2021	2022	2023	2022	2023
Capital expenditures					
R&D expenses					

- VI-9b. **Description of reported capital expenditures.**—Please describe the nature, focus, and significance of your firm’s reported capital expenditures. If no capital expenditure data were reported, please explain the reason.

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- VI-9c. **Description of reported R&D expenses.**—Please describe the nature, focus, and significance of your firm’s reported R&D expenses.

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VI-10a. **Data consistency and reconciliation.**—The quantities and values of total net sales reported in question VI-6 should reconcile with the total shipments reported in question VI-2 (including export shipments) for the annual-year periods as long as they are reported on the same calendar-year basis. The interim-period data should reconcile whether the financial data are on a calendar- or fiscal-year basis.

If the calculated fields below return values other than zero (i.e., "0") this indicates the total net sales quantities and values do not match the total shipments quantities and values.

Reconciliation	Calendar year			January-September	
	2021	2022	2023	2023	2024
<b>Quantity:</b> Trade data from question VI-2 (lines F, H, J, and L) less financial total net sales quantity data from question VI-6, = zero ("0").	0	0	0	0	0
<b>Value:</b> Trade data from question VI-2 (lines G, I, K, and M) less financial total net sales value data from question VI-6, = zero ("0").	0	0	0	0	0

Are the financial data in question VI-6 reported on a calendar-year basis?

☐ Yes— Complete question VI-10b.

☐ No— Continue to question VI-11.

V-10b. **Data consistency and reconciliation (calendar-year based financial data).**—Do the data in question VI-6 reconcile with the data in question VI-2 (i.e., the calculated fields are returning zeros in the table above) for all periods?

Yes	No	If no, please explain.
<input type="checkbox"/>	<input type="checkbox"/>	



If your responses to any of the items in questions VI-11, VI-12, and VI-13 differ by country, please describe these differences and, as applicable, indicate which country or countries your response refers to in the relevant form fields.

VI-11. **Effects of imports on investment.**—Since January 1, 2021, has your firm experienced any actual negative effects on its return on investment or the scale of capital investments as a result of imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

<b>No</b>	<b>Yes</b>	<b>If yes, my firm has experienced actual negative effects as follows.</b>
<input type="checkbox"/>	<input type="checkbox"/>	

	<i>(check as many as appropriate)</i>	<i>(please describe)</i>
<input type="checkbox"/>	Cancellation, postponement, or rejection of expansion projects	
<input type="checkbox"/>	Denial or rejection of investment proposal	
<input type="checkbox"/>	Reduction in the size of capital investments	
<input type="checkbox"/>	Return on specific investments negatively impacted	
<input type="checkbox"/>	Other	

VI-12. **Effects of imports on growth and development.**—Since January 1, 2021, has your firm experienced any actual negative effects on its growth, ability to raise capital, or existing development and production efforts (including efforts to develop a derivative or more advanced version of the product) as a result of imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

<b>No</b>	<b>Yes</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<b>If yes, my firm has experienced actual negative effects as follows.</b>

<i>(check as many as appropriate)</i>		<i>(please describe)</i>
<input type="checkbox"/>	Rejection of bank loans	
<input type="checkbox"/>	Lowering of credit rating	
<input type="checkbox"/>	Problem related to the issue of stocks or bonds	
<input type="checkbox"/>	Ability to service debt	
<input type="checkbox"/>	Other	

- VI-13. **Anticipated effects of imports.**—Does your firm anticipate any negative effects due to imports of epoxy resins from China, India, South Korea, Taiwan, and/or Thailand?

No	Yes	If yes, my firm anticipates negative effects as follows.
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-14. **Effects on financial performance of COVID-19.**—Has the COVID-19 pandemic, or any government actions taken to contain the spread of the COVID-19 virus, affected the financial performance of your firm's operations on processed epoxy resins as reported in question VI-6? In your response, please include the duration and timing of any impacts as they relate to your firm's financial performance.

No	Yes	If yes, please describe these effects.
<input type="checkbox"/>	<input type="checkbox"/>	

- VI-15. **Other explanations.**—If your firm would like to further explain a response to a question in the financial section of Part VI for which a narrative box was not provided, please note the question number and the explanation in the space provided below. Please also use this space to highlight any issues your firm had in providing the data in this section.

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## HOW TO FILE YOUR QUESTIONNAIRE RESPONSE

This questionnaire is available as a “fillable” form in MS Word format on the Commission’s website at: [https://www.usitc.gov/reports/active\\_import\\_injury\\_questionnaires](https://www.usitc.gov/reports/active_import_injury_questionnaires).

***Please do not attempt to modify the format or permissions of the questionnaire document.*** Please submit the completed questionnaire using one of the methods noted below. If your firm is unable to complete the MS Word questionnaire or cannot use one of the electronic methods of submission, please contact the Commission for further instructions.

- **Upload via Commission’s secure submission portal.**—The questionnaire must be uploaded in two formats: (1) a Microsoft Word 97-2003 document; and (2) a PDF copy of the complete questionnaire with a signature on the first page. Please include any attachments at the end of the PDF (e.g., APO certification, additional comments, etc.).

**Web address:** <https://www.usitc.gov/qportal>

**Pin:** EPOXY

**Phase:** FINAL

- **E-mail.**—E-mail the MS Word questionnaire to [Alejandro.Orozco@usitc.gov](mailto:Alejandro.Orozco@usitc.gov); include a PDF copy of the complete questionnaire with a signature on the first page. Submitters are strongly encouraged to encrypt nonpublic documents that are electronically transmitted to the Commission to protect your sensitive information from unauthorized disclosure. The USITC secure submission portal and the Electronic Document Information System (EDIS) use Federal Information Processing Standards (FIPS) 140-2 cryptographic algorithms to encrypt data in transit. Submitting your nonpublic documents by a means that does not use these encryption algorithms (such as by email) may subject your firm’s nonpublic information to unauthorized disclosure during transmission. If you choose a non-encrypted method of electronic transmission, the Commission warns you that the risk of such possible unauthorized disclosure is assumed by you and not by the Commission.

**If your firm does not produce this product**, please fill out page 1, print, sign, and submit a scanned PDF copy via the Commission’s secure submission portal or email.

**Parties to this proceeding.**—If your firm is a party to this proceeding, it is required to serve a copy of the completed questionnaire on parties to the proceeding that are subject to administrative protective order (see 19 CFR § 207.7). A list of such parties may be obtained from the Commission’s Secretary (202-205-1802). A certificate of service must accompany the completed questionnaire you submit (see 19 CFR § 207.7). Service of the questionnaire must be made in paper form.