

My name is Erica Bergman and I am here on behalf of General Technologies, SPC in regards to ion exchange resin, which is listed in Annex C, HTS code 3914.00.60

Ion exchange resin is a resin or polymer that acts as a medium for ion exchange with applications in:

- Water softening
- Water purification
- Production of high-purity water
- Juice purification
- Contaminate removal
- Sugar manufacturing
- And pharmaceuticals

This product is the vital primary component necessary to remove toxic and harmful chemicals, minerals, and metals such as:

- Arsenic
- Barium
- Iron
- Nitrate
- Uranium
- Chromate
- Hexavalent Chromium
- Metals
- Chloramine-Chlorine and ammonia
- And minerals amongst many other things

The US consumes an average of _____ cf of ion exchange resin annually with an estimated _____% of that being manufactured domestically. An estimated _____% of the resin consumed in the US is supplied by Chinese manufacturers.

The manufacturing process of ion exchange resin involves the use of highly dangerous and toxic materials that include but are not limited to:

- Styrene – Flammable & hazardous
- Divinylbenzene – Hazardous skin, eye, and lung irritant
- Sulfuric Acid – Causes serious burns and skin lesions
- Ethylene Dichloride– Related to major health hazards including kidney and liver damage. Can be fatal.

- Chloromethyl Methyl Ether – Flammable liquid that is toxic by ingestion and inhalation. It is also a carcinogen that targets the lungs, eyes, and kidneys. Even small molecular exposure is likely to cause cancer.

Due to the need for these highly hazardous and dangerous raw materials, the production of ion exchange resin produces a large amount of highly pollutant waste solution and gas:

- Copolymer production brings high COD (Chemical Oxygen Demand) waste solution by organic raw materials.
- High acid waste solution is difficult to recycle, so manufacturers have to pay high fees to outside companies for proper handling and disposal.
- In the production, Chloromethyl Methyl Ether, N, N-dimethyl Ethanol Amine and Trimethylamine, create a lot of waste solution with Chlorides and Amides, and with high COD which requires bio-chemical processing systems.
- The process also releases ammonia (NH₃) and hydrochloric acid (HCL) waste gasses into the air.

At this moment, there is not enough ion exchange resin being manufactured domestically to support the consumer demand; therefore, the US consumer will be financially affected by the proposed tariff.

Goods and services such as:

- Water bills
- Bottled water
- Pharmaceuticals
- Various processed food and beverages
- Sugar
- And that is skimming the surface of the products that will likely be affected

Should HTS code 3914.00.60 be imposed with this punitive tariff, and should we move in the direction of increasing domestic manufacturing, there will be a rapid increase in pollution.