October 21, 2025

The Honorable Howard W. Lutnick
Secretary of Commerce
Attn: Mr. Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
14th and Constitution Ave., NW
Washington, DC 20230

Via regulations.gov

Re: Comments on the Request for Inclusion of Equipment for Use in the LNG/Petrochemical Industry in the Scope of the Section 232 Measures on Steel and Aluminum

Dear Secretary Lutnick:

GPA Midstream Association ("GPA Midstream" or the "Association") respectfully submits the following comments in response to the request by the Committee on Pipe and Tube Imports ("CPTI") to include certain gas liquefaction and separation equipment within the scope of Section 232 measures on steel and aluminum derivative products. CPTI seeks inclusion of goods imported under the following HTS codes for use in the LNG/petrochemical industry:

- 8418.69.0180
- 8419.40.0080
- 8419.50.5000
- 8419.60.1000
- 8421.39.0140

GPA Midstream supports the Trump Administration's energy dominance agenda, which promotes reliable and affordable energy for Americans. We believe CPTI's request undermines these goals and urge the Bureau of Industry and Security (BIS) to reject it.

A. GPA Midstream Association's History and Membership

GPA Midstream is composed of approximately 50 corporate members that directly employ over 57,000 employees that are engaged in the gathering, transportation, processing, treating, storage and marketing of natural gas, natural gas liquids (NGLs), crude oil, and refined products, commonly referred to in the industry as "midstream activities." In 2024, GPA Midstream members operated more than 500,000 miles of pipelines, gathered nearly 91 Bcf/d of natural gas, and operated more than 340 natural gas processing facilities. Our members are an invisible link between raw natural gas and crude oil produced at the wellhead and the distribution of products to consumers for heating, electricity production, transportation, steelmaking, fertilizer production, plastics, high-tech devices, cosmetics, pharmaceuticals, and much more.

B. Lack of Domestic Production Capacity

The U.S. lacks sufficient capacity to produce the equipment under the five HTS codes CPTI identified. As a result, companies must rely on foreign suppliers in the short and medium term. CPTI itself acknowledges this, stating it is "not aware of any sources for domestic production of these derivative products."[1] Tariffs on these goods, which are not domestically produced today, would only serve to drive up costs for the critical U.S. energy industry that need this equipment to serve American consumers every day.

Expanding Section 232 tariffs to these goods would not shift demand to domestic sources—none exist. Building domestic manufacturing capacity would require years and significant investment. In the meantime, tariffs would raise costs for GPA Midstream members and, ultimately, for consumers.

Heat exchangers and gas separation equipment are especially critical. Limiting suppliers would reduce availability and delay projects. CPTI's justification does not address whether U.S. producers can meet the full scope of energy project needs, particularly if the Administration aims to achieve energy dominance.

C. Impact on Consumer Energy Prices

To avoid raising energy costs for consumers, BIS should reject expanding Section 232 tariffs to these HTS codes. Additional tariffs would unnecessarily increase the cost of building new energy infrastructure.

D. CPTI's Representation Is Unclear

CPTI's submission does not list any members or provide a website with membership information. Its listed address matches that of its legal counsel, Schagrin Associates. These facts cast doubt on CPTI's claim to be a "leading industry association." BIS should not expand

[1] Request, page 4.

Section 232 tariffs based on a request from an organization whose representation of the U.S. pipe and tube industry is unverified.

E. Consideration of CGA's Comment

GPA Midstream recommends BIS also consider the comments submitted by the Compressed Gas Association (CGA). Most of their concerns align with ours and provide additional data on how tariffs would negatively impact their members.

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Given the lack of domestic production, potential consumer cost increases, and CPTI's questionable representation, we respectfully urge BIS to reject CPTI's Request. If you have any questions or require additional information, please contact me.

Respectfully submitted,

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