



## **EAPA Investigation No. 7509: Vanguard National Trailer Corporation (Notice of Covered Merchandise Referral, June 9, 2021)**

Concerning the Investigation of Evasion of the Antidumping and Countervailing Duty Orders on Certain Steel Wheels 22.5 and 24.5 Inches in Diameter (Steel Wheels) from the People's Republic of China (A-570-082 and C-570-083)

On August 18, 2020, CBP initiated an EAPA investigation based on a properly filed allegation that reasonably suggested that Vanguard National Trailer Corporation (Vanguard) entered merchandise into the customs territory of the United States through evasion of the AD and CVD orders on steel wheels from China.

The scope of the AD and CVD orders on steel wheels from China covers "certain on-the-road steel wheels, discs, and rims for tubeless tires, with a nominal rim diameter of 22.5 inches and 24.5 inches ... {and} includes rims and discs that have been further processed in a third country, including, but not limited to, the welding and painting of rims and discs from China to form a steel wheel, or any other processing that would not otherwise remove the merchandise from the scope of the proceeding if performed in China." CBP is unable to determine whether the steel wheels exported from Thailand by Asia Wheel Co. Ltd. (Asia Wheel), which are produced from imported rectangular steel plates from China and a third country that Asia Wheel converts into rims in Thailand and welds with Chinese-origin discs in Thailand, are covered merchandise subject to the AD and CVD orders.

CBP requires a determination on whether steel wheels produced under the scenario described above are covered merchandise within the scope of the AD and CVD orders. Such a determination will assist the EAPA investigation in determining which merchandise is subject to the payment of antidumping and countervailing duties. Therefore, CBP requests that the Department of Commerce (Commerce) determine whether the steel wheels exported from Thailand by Asia Wheel, which are produced from imported rectangular steel plates from China and a third country that Asia Wheel converts into rims in Thailand and welds with Chinese-origin discs in Thailand, are covered merchandise subject to the AD and CVD orders on steel wheels from China.

If you have any questions specific to EAPA Investigation No. 7509, please contact CBP at [epallegations@cbp.dhs.gov](mailto:epallegations@cbp.dhs.gov), and include EAPA Investigation No. 7509 in the subject line of the message. For any questions specific to the scope referral and its procedures, please contact Commerce at the Customs and Border Protection Liaison Unit, Enforcement and Compliance, International Trade Administration, at (202) 482-0984.