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UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Office of the Director Bureau of Competition

SEP 1 5 2010

Mark R. Merley, Esq. Arnold & Porter 555 Twelfth Street, N.W. Washington, DC 20004-1206

Re: Occidental Chemical Corporation, FTC File No. 081-0215

Dear Mr. Merley:

The Federal Trade Commission's Bureau of Competition has been conducting a nonpublic investigation to determine whether PQ Corporation or Occidental Chemical Corporation or any other unnamed persons, partnerships, or corporations have engaged or are engaging in conduct that violates Section 5 of the Federal Trade Commission Act, as amended, 15 U.S.C. § 45, through agreements or facilitating practices, including but not limited to signaling, exchange or swap agreements, contracts for or acquisitions of supply or capacity of competitors, contract terms or other practices, relating to sodium silicate and related products.

Upon further review of this matter, it now appears that no further action is warranted by the Commission at this time. Accordingly, the investigation has been closed. This action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may require.

Sincere

Richard A. Feinstein Director