

**Huntsman International LLC  
10003 Woodloch Forest Drive  
The Woodlands, TX 77380**

March 3, 2016

**VIA EDGAR**

United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
Attn: Pamela Long, Assistant Director, Office of Manufacturing and Construction

**Re: Huntsman International LLC  
Registration Statement on Form S-4  
File No. 333-209776**

Pursuant to Rule 461 of the General Rules and Regulations under the Securities Act of 1933, as amended (the "Securities Act"), Huntsman International LLC and its subsidiaries, Airstar Corporation, Chemical Specialties LLC, Huntsman Advanced Materials Americas LLC, Huntsman Advanced Materials LLC, Huntsman Australia LLC, Huntsman Australia Holdings LLC, Huntsman Chemical Purchasing LLC, Huntsman Enterprises LLC, Huntsman Ethyleneamines LLC, Huntsman Fuels LLC, Huntsman International Financial LLC, Huntsman International Fuels LLC, Huntsman International Trading Corporation, Huntsman MA Investment Corporation, Huntsman MA Services Corporation, Huntsman P&A Americas LLC, Huntsman P&A Investments LLC, Huntsman Petrochemical LLC, Huntsman Petrochemical Purchasing LLC, Huntsman Procurement LLC, Huntsman Propylene Oxide LLC, Huntsman Purchasing, Ltd., Huntsman Surfactants Technology Corporation, Tioxide Americas (Holdings) LLC and Tioxide Group, (collectively, the "Registrants"), hereby request that the effective date of the above-captioned Registration Statement (the "Registration Statement") be accelerated so that the Registration Statement, as then amended, will become effective by 4:00 p.m. Eastern time, on Tuesday, March 8, 2016, or as soon thereafter as practicable.

The Registrants hereby affirm that they are aware of their obligations under the Securities Act. In connection with the foregoing request, the Registrants further acknowledge that:

- should the Securities and Exchange Commission (the "Commission") or the staff (the "Staff"), acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the Staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the Registrants from their full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Registrants may not assert Staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

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It would be appreciated if, as soon as the Registration Statement is declared effective, you would so inform either Sean H. Pettey of the Company at (801) 584-5776 or Nathan W. Jones of Stoel Rives LLP at (801) 578-6943, and then send written confirmation to the addressees listed on the cover of the Registration Statement.

Very truly yours,

Airstar Corporation  
Chemical Specialties LLC  
Huntsman Advanced Materials Americas LLC  
Huntsman Advanced Materials LLC  
Huntsman Australia LLC  
Huntsman Australia Holdings LLC  
Huntsman Chemical Purchasing LLC

Huntsman Enterprises LLC  
Huntsman Ethyleneamines LLC  
Huntsman Fuels LLC  
Huntsman International Financial LLC  
Huntsman International Fuels LLC  
Huntsman International LLC  
Huntsman International Trading Corporation  
Huntsman MA Investment Corporation  
Huntsman MA Services Corporation  
Huntsman P&A Americas LLC

Huntsman P&A Investments LLC  
Huntsman Petrochemical LLC  
Huntsman Petrochemical Purchasing LLC  
Huntsman Procurement LLC  
Huntsman Propylene Oxide LLC  
Huntsman Purchasing, Ltd.

By Huntsman Procurement LLC, its General Partner  
Huntsman Surfactants Technology Corporation.  
Tioxide Americas (Holdings) LLC

By: /s/ John R. Heskett

John R. Heskett

Vice President, Planning and Treasurer

Tioxide Group

By: /s/ J. Kimo Esplin

J. Kimo Esplin

Director