



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

October 28, 2019

Charles Herlinger
Chief Financial Officer
Orion Engineered Carbons S.A.
4501 Manolia Cove Drive, Suite 106
Houston, TX 77345

Re: Orion Engineered Carbons S.A.
Form 20-F for the year ended December 31, 2018
Filed March 8, 2019
File No. 001-36563

Dear Mr. Herlinger:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc: Jonathan Ellis