



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

October 7, 2009

Via U.S. Mail and Facsimile (626-683-4048)

James S. Marlen  
Director, Chairman of the Board and Chief Executive Officer  
Ameron International Corporation  
245 South Los Robles Avenue  
Pasadena, CA 91101-3638

**Re: Ameron International Corporation**  
**Form 10-K for the Fiscal Year Ended November 30, 2008**  
**Filed January 29, 2009**  
**File No. 1-9102**  
**Response Letter Filed September 14, 2009**

Dear Mr. Marlen:

We refer you to our comment letter dated March 26, 2009 regarding business contacts with Iran, Syria, Sudan and Cuba. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Pamela Long  
Assistant Director  
Division of Corporation Finance