Trane U.S. Inc.
Lynn Haven Facility
Facility ID No.: 0050080
Bay County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0050080-004-AV

Permitting and Compliance Authority:
Florida Department of Environmental Protection
Northwest District
160 Governmental Center, Suite 308
Pensacola, FL 32502-5794
Telephone: 850/595-8300
Fax: 850/595-8096

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FINAL Permit No.: 0050080-004-AV

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Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

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Lt. Governor

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Permittee:
Trane U.S. Inc.
200 Aberdeen Loop
Panama City FL 32405

FINAL Permit No.: 0050080-004-AV
Facility ID No.: 0050080
SIC No(s).: 35, 3585
Project: Title V Air Operation Permit Renewal

This permit is the Title V Operating Permit Renewal for the Trane U.S. Inc. Lynn Haven Facility, which manufactures air conditioning unit cooling fins. This facility is located at 200 Aberdeen Loop, Lynn Haven, Bay County; UTM Coordinates: Zone 16, 632.88 km East and 3344.56 km North; and, Latitude: 30° 13' 37" North and Longitude**:** 85° 37' 09" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named Permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Attachment 1, VOC Emission Reduction Program
APPENDIX TV-6, TITLE V CONDITIONS version dated 6/23/06

Effective Date: October 23, 2008
Renewal Application Due Date: March 12, 2013
Expiration Date: October 23, 2013

/s/

Rick Bradburn
Air Program Administrator

RB/rp/c

Section I. Facility Information.

Subsection A. Facility Description.

The Trane U.S. Inc. Lynn Haven Facility (Trane) manufactures air conditioner unit cooling fins. As part of the manufacturing process, Trane utilizes fin presses to make the heat-dissipating fins, and uses volatile lubricating oil during the pressing and stamping operations. The lubricating oil is RENOFORM 28 oil manufactured by Fuchs Lubricants Co. (permitted at 91.61 percent VOC by weight, primarily odorless mineral spirits), and does not contain any HAP in any detectable quantity. The lubricating oil is the source of the facility's VOC emissions.

Trane requested exemption from permitting for the fin pressing process July 31, 2000. The exemption was granted by the Department August 3, 2000, since the associated VOC emissions at that time were less than five tons per year (Generic Emissions Unit Exemption, Rule 62-210.300(3)(b)1, F.A.C.).

Trane submitted an air construction permit application July 10, 2001 to increase their usage of lubricating oil from 22 drums per year (1,430 gallons) to 312 drums per year (17,160 gallons). Permit 7775141-001-AC was issued October 11, 2001 limiting the use of the lubricating oil to 17,160 gallons per consecutive 12-month period, the equivalent of 49.82 tons VOC per year.

Trane submitted another air construction permit application October 22, 2002 to increase their usage of lubricating oil to 55,630 gallons/year. Subsequently, permit 0050080-002-AC was issued January 30, 2003 limiting the use of the lubricating oil to 55,630 gallons per consecutive 12 months, the equivalent of 162 tons VOC per year. This permit also required that Trane evaluate alternatives to reduce VOC emissions, and submit semi-annual VOC Emission Reduction Progress Reports.

This facility also contains various emission activities that are considered insignificant consistent with Rule 62-213.430(6), F.A.C. These activities include laboratory and brazing and welding equipment, a non-halogenated solvent parts washer, a 8,000-gallon lubricating oil storage tank, natural gas usage, and insulation adhesive application booths. These activities are specifically identified in Appendix I-1, List of Insignificant Emissions Units and/or Activities. A chiller, model no. CGAFC304ADA1A000000000P00T0W00, using HCFC-22 (R-22, hydrochlorofluorocarbon-22), is regulated under Title VI.

Based on the permit application received February 15, 2008, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

EU I.D.	Brief Description
001	VOC Emissions from Fin Press Operations

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to Permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Statement of Basis

These documents are on file with the permitting authority:
Title V Air Operation Permit issued August 15, 2003
Appendix H-1, Permit History
Application for a Title V Air Operation Permit Renewal received February 15, 2008

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited
No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.; and permit no. 0050080-002-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard
Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA)
a. Permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,
b. Permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

5. Insignificant Emissions Units and/or Activities
Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions
Permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
Procedures to minimize pollutant emissions shall include the following:

a. Tightly cover or close all VOC containers when they are not in use.
b. Tightly cover, where possible, all open troughs, basins, baths, tanks, etc when they are not in use.
c. Maintain all piping, valves, fittings, etc. in good operating condition.
d. Prevent excessive air turbulence across exposed VOC.

e. Immediately confine and clean up VOC spills and make sure appropriate wastes are placed in closed containers for reuse, recycling, or proper disposal.

[Rule 62-296.320(1)(a), F.A.C.]

7. Emissions of Unconfined Particulate Matter

Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements (see Condition 57 of APPENDIX TV-4, TITLE V CONDITIONS):

a. Paving and maintenance of roads, parking areas and yards

b. Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, stockpiles, and similar activities,

c. Landscaping or planting of vegetation, and

d. Keeping dust-containing receptacles closed and protected from the wind.

[Rule 62-296.320(4)(c)2., F.A.C., and permit 0050080-002-AC]

8. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

9. Statement of Compliance

The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]
{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51 of APPENDIX TV-6, TITLE V CONDITIONS)}

10. Permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District Office.

Department of Environmental Protection
Northwest District Office
160 Governmental Center, Suite 308
Pensacola, Florida 32502
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to NWDAIR@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Ave, Panama City FL 32405.

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-8300, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8300, then press 7, during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

12. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch

Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

13. Certification by Responsible Official (RO)
In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	VOC Emissions from Fin Press Operations

Trane utilizes a fin press operation to make heat-dissipating fins in air conditioning units. Fins are pressed and stamped from a roll of solid sheet steel, after the sheet stock has been lubricated with RENOFORM 28 oil (primarily odorless mineral spirits with no HAP in any detectable quantity). The fin presses are located inside Trane's Lynn Haven facility with no outside exhaust and volatile emissions are dispersed within the building as fugitive emissions. Trane currently uses the following three fin presses:

Equipment No.	Equipment Manufacturer and Model No.
FP#1	Burr Oak Model No. FP-3-54-1771
FP#2	Burr Oak Model No. FP-3-54-1772
FP#3 *	Burr Oak Model No. FP-2-48-1466

* Smaller unit than FP#1 and FP#2

Trane is preparing to construct three additional fin presses after receipt of an effective construction permit.

This Title V Operation Permit allows the use of 55,630 gallons per year oil with equivalent VOC emissions of 164 tons per year.

Trane has committed to evaluate reducing VOC emissions by developing a process that will use a reduced VOC lubricant to stamp air conditioner coil fins and/or other process changes designed to reduce the quantity of lubricant necessary to stamp air conditioner coil fins. Trane's VOC Emission Reduction Program for the fin stamping presses is attached to this permit and made a part of this permit (Attachment 1).

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity
The usage of fin press lubricating oil shall not exceed 55,630 gallons per consecutive 12-month rolling period with a reported VOC content of no more than 91.61% and no detectable HAP.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and Permit 0050080-002-AC]

A.2. Hours of Operation
This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and Permit 0050080-002-AC]

Record Keeping and Reporting Requirements

A.3. Permittee shall maintain monthly and rolling consecutive 12-month material usage (fin press lubricating oil) records. Monthly summaries, denoting the monthly usage and the previous

11 months usage, shall be kept and maintained onsite for Department inspection at least five years from the date of usage.
[Rules 62-4.160(2), 62-210.200 (PTE), F.A.C., and Permit 0050080-002-AC]

A.4. A VOC Emission Reduction Program (Attachment 1) is incorporated into and made a part of this permit. Permittee shall submit semi-annual progress reports to update the Department on Trane's progress with their VOC reduction program. The reports shall be submitted no later than March 1 (concurrent with the Annual Operating Report, see condition 24, TV-6 conditions) and September 1 of each year.
[Rule 62-4.070, F.A.C., and Permit 0050080-002-AC]

A.5. Permittee shall obtain Department approval prior to utilizing any fin press lubricating oil other than RENOFORM 28, manufactured by Fuchs Lubricants Co. if the proposed fin press lubricating oil has a reported VOC content of more than 91.61% or any detectable HAP. Permittee may use alternative fin press lubricating oils with a reported VOC content of less than 91.61% and no detectable HAP by providing the Department written notice and data on the VOC and HAP content of the proposed fin press lubricating oil.
[Rule 62-4.070, F.A.C., and Permit 0050080-002-AC]