STATEMENT OF BASIS

Trane U.S. Inc.
Lynn Haven Facility
Facility ID No.: 0050080
Bay County
Title V Air Operation Permit
FINAL Permit No.: 0050080-004-AV

This Title V air operation permit 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 perform the work or 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.

The Trane U.S. Inc., Lynn Haven Facility (Trane) manufactures air conditioner unit fins. As part of the manufacturing process, Trane utilizes fin presses to make heat-dissipating fins, and uses volatile lubricating oil during the pressing and stamping operations. The lubricating oil is Oak 50-5 oil manufactured by Oak International, Inc. (91.61 percent VOC by weight, primarily odorless mineral spirits), which does not contain any HAP in any detectable quantity. The lubricating oil is the source of the Trane's VOC emissions discharged as fugitive emissions without controls.

This Title V Operation Permit includes a single emissions unit, EU 001, VOC Emissions from Fin Press Operations, and allows the use of 55,630 gallons per year Oak 50-5 oil with equivalent VOC emissions of 162 tons per year. This activity is not subject to any source-specific emission limit.

The permit requires record keeping of monthly and rolling 12-month material usage to demonstrate compliance with the material usage limits. Additionally, the permit requires evaluation of reducing VOC emissions and includes a VOC Emission Reduction Program requiring semi-annual progress reports.

CAM does not apply.

Also included in this permit are miscellaneous insignificant activities.

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