of US shipments as a proxy for US production, Petitioner believes that the table below provides a reasonable estimate based on its knowledge of market.[32]

Table 1: Air Compressors Domestic Industry Support Calculation (units)	
Total Estimated Domestic Production	[*number*]
Petitioner's Production	[*number*]
Petitioner's Share	[*number*]

E. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

Petitioner has not previously sought relief from imports of dumped and subsidized air compressors. Petitioner has not filed for relief from imports of the subject merchandise under section 337 of the Tariff Act, section 301 of the Trade Act of 1974, or section 232 of the Trade Expansion Act of 1962.[33]

F. Scope of the Investigation and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5)

1. Scope of Investigation

The language below describes the imported merchandise that Petitioner intends to be included in the scope of these investigations.

> The merchandise covered by these investigations consists of certain stationary and portable air compressors, electric, gas and battery powered, including electric motor and gasoline engine powered air compressors with either oil free or oil lubricated reciprocating pumps. The compressors may be either direct drive or belt driven.

[32] The calculation in Table 1 uses Petitioner's actual 2025 U.S. production volume as well as U.S. shipments data for the other U.S. producers, as noted. If Petitioner's 2025 U.S. shipments are used, Petitioner's share of estimated U.S. production is [%] percent. *See* Industry Support Calculation, attached as **Exhibit I-3**.

[33] While Petitioner did not "file for" relief under Section 232, Ingersoll Rand, another domestic producer of air compressors, recently requested Commerce to include finished air compressors, subheadings 8414.80.16XX of the HTSUS, in the Section 232 of the Trade Expansion Act of 1962 (Section 232) steel and aluminum tariffs, which the Bureau of Industry and Security approved on August 1, 2025. *See* Ingersoll Rand, *Requesting Inclusions to the Adjustment of Imports of Aluminum and Steel Imposed Pursuant to Section 232 of the Trade Expansion Act of 1962* (May 14, 2025), attached as **Exhibit I-26**; *See* Ingersoll Rand IDM, attached as **Exhibit I-25**.

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Direct drive air compressors included in the scope have a motor connected directly to the compressor element. Belt driven air compressors included in the scope have a motor connected to the compressor crankshaft with a belt. Direct drive air compressors are more often portable but can be stationary, while belt driven air compressors are either portable or stationary.

The scope includes electric and engine driven air compressors, with either oil free or oil lubricated reciprocating pumps, with an integrated pressure vessel that ranges in size from 4 gallons to 80 gallons.

The scope also includes battery powered motor driven air compressors, with either oil free or oil lubricated reciprocating pumps, with an integrated pressure vessel that ranges in size from 1 to 30 gallons.

Covered air compressors have a power level designation between 373 watts (.5 HP) and 22.37 kilowatts (30 HP). Specifically, portable air compressors often range in power from .5HP (373 watts) to 15HP (11.19KW). Reciprocating stationary air compressors range in power from .5HP (373 watts) to 25HP (18.64KW). However, a portable or stationary air compressor with a different power level, within the range of 373 watts to 22.37 KW, and otherwise meeting the language of the scope, is covered by the scope.

The scope includes only certain reciprocating (piston) compressors, which use a piston moving back and forth in a cylinder to compress the air. The scope does not include rotary compressors. Types of rotary compressors excluded from the scope include rotary screw, rotary vane, and scroll compressors. The scope also excludes dynamic compressors. Types of dynamic compressors excluded from the scope include centrifugal compressors and axial compressors. Subject merchandise also includes finished and unfinished compressors that are further processed in a third country or in the United States, including, but not limited to, assembly or any other processing that would not otherwise remove the merchandise from the scope of this order if performed in the country of manufacture of the in-scope air compressors.

For the purposes of this scope, "unfinished compressors" are compressors which require additional fabrication such as labeling, and packaging, and kitting operations adding accessories.

Specifically included in the scope are compressors which are imported as part of a package with accessories or other products, or kit. Such accessories include but are not limited to hoses, fittings, tool kits, oils, nail guns, pneumatic paint sprayers, air ratchet wrenches, air grease guns, air drills, air hammers, air sanders, air inflators, and air impact drivers. If such accessories or other products are imported separately from the air compressor, such products are not subject to the scope of this order.

Specifically excluded from the scope are AC, DC and battery powered and battery powered inflators. The excluded inflators do not have an integrated air tank or air reservoir. The excluded inflators have an output of 1 CFM or less.

The in-scope stationary air compressors are classified under subheadings 8414.80.16.15, 8414.80.16.25, and 8414.80.16.35 of the Harmonized Tariff Schedule of the United States

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("HTSUS") The in-scope portable air compressor is classified under subheading 8414.80.16.85 of the HTSUS. Although the HTSUS codes are provided for convenience and customs purposes, the written description of the covered merchandise is dispositive.

2. Technical Characteristics and Uses

The merchandise subject to these investigations consists of stationary and portable air compressors, electric, gas and battery powered. In-scope stationary and portable air compressors include the following components: (1) compressor pump, (2) motor, engine or battery, (3) intake and exhaust valves, (4) air storage tank, (5) cooling system, (6) pressure system, (7) safety valve, and (8) control panel. In-scope stationary and portable air compressors may also be direct drive or belt driven.

Direct drive air compressors have a motor which is directly connected on the drive shaft to the compressor element. These compressors are typically more compact, have fewer moving parts, are simpler to maintain, more efficient, and used for continuous applications.

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