STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE

PSD PERMIT TO CONSTRUCT / MODIFY AIR CONTAMINANT SOURCE(S)

Permit Number: 980244

Facility (Permittee): Adient US LLC

Facility ID: 28-0076

Facility Address: 1890 Mines Road, Pulaski
Giles County

Facility Classification: Title V

Federal Requirements: PSD (VOC): 40 CFR 63 Subpart OOOOOO

Facility Description: Polyurethane Foam Production Facility

Permit 980244, consisting of 27 pages is hereby issued DRAFT , 20**, pursuant to the Tennessee Air Quality Act and by the Technical Secretary, Tennessee Air Pollution Control Board, Department of Environment and Conservation. This permit expires on ***** **, 20**. The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations (TAPCR).

Michelle W. Owenby
Technical Secretary
Tennessee Air Pollution Control Board

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

Section I – Sources Included in this Construction Permit

FACILITY DESCRIPTION			
Source Number	**Source Description**	**Status**	**Control Device/Equipment**
01	Polyurethane Foam Production (automotive seats)	Modified	None

Section II – Permit Record

Permit Type	Description of Permit Action	Issue Date
Initial	Initial PSD construction permit issuance	DRAFT

Section III - General Permit Conditions

G1. Responsible Person

The application that was utilized in the preparation of this construction permit is dated March 30, 2022, and is signed by Ryan Speck, Plant Manager, the Responsible Person for the permittee. The Responsible Person may be the owner, president, vice-president, general partner, plant manager, environmental/health/safety coordinator, or other person that is able to represent and bind the facility in environmental permitting affairs. If this Responsible Person terminates their employment or is assigned different duties and is no longer the person to represent and bind the permittee in environmental permitting affairs, the new Responsible Person for the permittee shall notify the Technical Secretary of the change in writing. The Notification shall include the name and title of the new Responsible Person assigned by the permittee to represent and bind the permittee in environmental permitting affairs, and the date the new Responsible Person was assigned these duties.

Should a change in the Responsible Person occur, the new Responsible Person must submit the Notification provided in Appendix 1 of this permit no later than 30 days after the change. A separate notification shall be submitted for each subsequent change in Responsible Person.

TAPCR 1200-03-09-.03(8)

G2. Application and Agreement Letters

This source shall operate in accordance with the terms of this permit, the information submitted in the approved permit application referenced in **Condition G1**, and any documented agreements made with the Technical Secretary.

TAPCR 1200-03-09-.01(1)(d)

G3. Submittals

Unless otherwise specified within this permit, the permittee shall submit, preferably via email and in Adobe Portable Document format (PDF), all applicable plans, checklists, certifications, notifications, test protocols, reports, and applications to the attention of the following Division Programs at the email addresses indicated in the table below:

Permitting Program	Compliance Validation Program	Field Services Program
• Notifications • Startup certifications • Applications • NSPS reports • MACT/GACT/NESHAP reports • Emission statements • Construction permit extension requests	• Test protocols • Emission test reports • Visible emission evaluation reports	• Semiannual reports • Annual compliance certifications/status reports
Division of Air Pollution Control William R. Snodgrass TN Tower, 15th Floor 312 Rosa L. Parks Avenue Nashville, TN 37243 Air.Pollution.Control@tn.gov		Columbia Environmental Field Office Division of Air Pollution Control 1421 Hampshire Pike Columbia, TN 38401 APC.ColuEFO@tn.gov

The permittee shall submit the information identified above as requested in this permit. In lieu of submitting this information to the email addresses above, the permittee may submit the information to the attention of the respective Division Programs at the mailing addresses listed above.

TAPCR 1200-03-09-.03(8)

G4. Notification of Changes

The permittee shall notify the Technical Secretary for any of the following changes to a permitted air contaminant source which would not be a modification requiring a new construction permit:

- change in air pollution control equipment that does not result in an increase or otherwise meet the definition of a modification
- change in stack height or diameter
- change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

The permittee must submit the Notification provided in Appendix 2 of this permit 30 days before the change is commenced.

TAPCR 1200-03-09-.02(7)

G5. Permit Transference

A. This permit is not transferable from one air contaminant source to another air contaminant source or from one location to another location. The permittee must submit a construction permit application for a new source to the Permitting Program not less than 90 days prior to the estimated starting date of these events. If the new source will be subject to major New Source Review, the application must be submitted not less than 120 days in advance of the estimated starting date of these events.

TAPCR 1200-03-09-.03(6)(b) and 1200-03-09-.01(1)(b)

B. In the event an ownership change occurs at this facility, the new owner must submit the notification provided in Appendix 3 of this permit. The written notification must be submitted by the new owner to the Permitting Program no later than 30 days after the ownership change occurs. If the change in ownership results in a change in Responsible Person for the facility, notification of the change in Responsible Person must also be submitted, as specified in **Condition G1**.

TAPCR 1200-03-09-.03(6)(a) and (b)

G6. Operating Permit Application Submittal

The permittee shall submit a revised application for the Title V renewal permit number 578338 not less than 180 days prior to this permit's expiration date.

TAPCR 1200-03-09-.02(11)(d)1(i)(II)

G7. Temporary Operating Permit

This construction permit shall serve as a temporary operating permit from the date of issuance, until the Technical Secretary issues a new Title V operating permit, provided the permittee submits a revised Title V renewal application, within the timeframe specified in **Condition G6**.

TAPCR 1200-03-09-.02(1), 1200-03-09-.02(2), and 1200-03-09-.02(11)(d)1(i)(V)

G8. Startup Certification for New or Modified Source(s)

Not Applicable

G9. Fees

The air contaminant source(s) identified in this permit shall comply with the requirements for payment of applicable annual emission fees to the Tennessee Division of Air Pollution Control.

TAPCR 1200-03-26-.02

G10. General Recordkeeping Requirements

A. All recordkeeping requirements for all data required to be recorded shall follow the following schedules:

For Daily Recordkeeping	For Weekly Recordkeeping	For Monthly Recordkeeping
No later than seven days from the end of the day for which the data is required.	No later than seven days from the end of the week for which the data is required.	No later than 30 days from the end of the month for which the data is required.

B. The information contained in logs, records, and submittals required by this permit shall be kept at the facility's address, unless otherwise noted, and provided to the Technical Secretary or a Division representative upon request. Computer-generated logs are acceptable. Compliance is assured by retaining the logs, records, and submittals specified in this permit for a period of not less than five years at the facility's address.

TAPCR 1200-03-10-.02(2)(a)

G11. Routine Maintenance Requirements

The permittee shall maintain and repair the emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

Compliance Method: Records of all repair and maintenance activities required above shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than five years. The date each maintenance and repair activity began shall be entered in the log no later than seven days following the start of the repair or maintenance activity, and the completion date shall be entered in the log no later than seven days after activity completion.

G12. Visible and Fugitive Emissions

A. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period, and for no more than four six-minute periods in any 24-hour period. A stack is defined as any chimney, flue, conduit, exhaust, vent, or opening of any kind whatsoever, capable of, or used for, the emission of air contaminants.

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: When required to demonstrate compliance, visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

B. The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions shall include, but are not limited to, the following:

(a) Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
(b) Application of asphalt, water, or suitable chemicals on dirt roads, material stockpiles, and other surfaces which can create airborne dusts;
(c) Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five minutes per hour or 20 minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in TAPCR 1200-03-20. A malfunction is defined as, any sudden and unavoidable failure of process equipment or for a process to operate in an abnormal and unusual manner. Failures that are caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

TAPCR 1200-03-08-.01(1) and 1200-03-08-.01(2)

Compliance Method: When required to demonstrate compliance, fugitive emissions shall be determined by Tennessee Visible Emissions Evaluation Method 4 as adopted by the Tennessee Air Pollution Control Board on April 16, 1986.

C. Fugitive emissions from roads and parking areas shall not exhibit greater than 10% opacity.

TAPCR 1200-03-08-.03

Compliance Method: When required to demonstrate compliance, fugitive emissions from roads and parking areas shall be determined by utilizing Tennessee Visible Emissions Evaluation (TVEE) Method 1, as adopted by the Tennessee Air Pollution Control Board on April 29, 1982, as amended on September 15, 1982 and August 24, 1984.

G13. Facility-wide Requirements/Limitations

The as-supplied VOC and HAP content of all VOC and HAP-containing materials (Inluding but not limited to coatings, inks, adhesives, thinners, and solvents) to be used by this source shall be determined from Safety Data Sheets (SDS) or manufacturer or vendor formulation data which explicitly list the VOC and HAP content by weight. If new materials are used, or if material formulation is changed, logs used to calculate emissions of VOC and HAP shall be updated within 30 days from the initial date of usage of the new or altered material.

TAPCR 1200-03-09-.03(8) and TAPCR 1200-03-10-.02(2)(a)

Compliance Method: Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current SDS, must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained in accordance with **Condition G10**. In lieu of paper documents, scanned documents (maintained electronically) may be used to fulfill this requirement.

TAPCR 1200-03-10-.02(2)(a)

G14. NSPS/NESHAP/MACT/GACT Standards

The following source(s) are subject to and shall comply with all applicable requirements of each NSPS/NESHAP/MACT/GACT standard as indicated in the table below, including the General Provisions identified in Appendix 9. The applicable requirements of each standard are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

Source	NESHAP/MACT/GACT	NSPS
01	40 CFR 63 Part OOOOOO	Not Applicable

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance methods are provided in the conditions in **Section IV** of this permit.

G15. VOC and NO_X Emission Statement

Not applicable

G16. Permit Supersedes Statement

This permit supersedes the conditions (E4-1, E4-2, and E4-3) for Source 01 in Title V Permit 569269 upon issuance of this permit.

TAPCR 1200-03-09-.03(8)

G17. Source Testing Requirements

Not Applicable

Section IV – Federal and/or State Only Requirements

F1-1. Prevention of Significant Deterioration of Air Quality

A This permit allows the modification of source 28-0076-01 (three polyurethane foam production lines) subject to the Prevention of Significant Deterioration (PSD) review provisions of TAPCR 1200-03-09-.01(4) for significant emissions increases of volatile organic compounds (VOC) associated with the proposed project. This facility shall modify and operate this emission source in accordance with the terms of this permit and the information submitted in the approved permit application. Approval to construct shall not relieve any owner or operator of the responsibility to comply fully with the applicable provisions under Division 1200-03, Division 0400-30, and any other requirements under local, State, or Federal law.

B The permittee shall apply best available control technology (Table F1-1) for each regulated NSR pollutant that has the potential to emit in significant amounts.

Table F1-1: Best Available Control Technology (BACT)

Emission Source Reference Number	Description	Pollutant(s)	Best Available Control Technology
28-0076-01	Three polyurethane foam production lines	VOC	Utilize good work practice standards to reduce VOC emissions
			VOC emission limit of 491.40 ton per 12 consecutive months

TAPCR 1200-03-09-.01(4)

F2-1. 40 CFR Part 63 Subpart OOOOOO - National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources

This source is subject to all applicable requirements of 40 CFR Part 63, Subpart OOOOOO, National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources. The following standards will apply to this source:

(1) The permittee must not use a material containing methylene chloride as an equipment cleaner to flush the mixhead or use a material containing methylene chloride elsewhere as an equipment cleaner in a molded flexible polyurethane foam process.

(2) The permittee must not use a mold release agent containing methylene chloride in a molded flexible polyurethane foam process.

40 CFR §63.11416(c) and TAPCR 1200-03-09-.03(8)

Compliance Method:

(1) Compliance may be demonstrated using VOC containing material usage records, Safety Data Sheets (SDS), manufacturer's formulation data, and engineering calculations. The permittee shall maintain documentation used to demonstrate compliance in accordance with **Condition G10**.

(2) The permittee shall keep a certification on file at the plant site that contains the following statements, and must be signed by a responsible official:

(i) "This facility does not use any equipment cleaner to flush the mixhead which contains methylene chloride, or any other equipment cleaner containing methylene chloride in a molded flexible polyurethane foam process in accordance with § 63.11416(c)(1)."

(ii) "This facility does not use any mold release agent containing methylene chloride in a molded flexible polyurethane foam process in accordance with § 63.11416(c)(2)."

40 CFR §63.11416(f), 40 CFR §63.11417(c), and TAPCR 1200-03-09-.03(8)

Section V - Source Specific Permit Conditions

Source Number	Source Description
01	**Polyurethane Foam Production -** Source consists of three foam production lines where various mixtures of Polyol, Toluene Diisocyanate (TDI), and Diethanolamine (DEOA), are injected into molds to produce polyurethane foam for automotive seat cushions. Minor repairs are performed using Methylene Diphenyl Diisocyanate (MDI) as the foaming agent (Area Source: NESHAP-Subpart OOOOOO, PSD/BACT)

S1-1. Input Limitation(s) or Statement(s) of Design

Not Applicable

S1-2. Production Limitation(s)

Not Applicable

S1-3. Operating Hour Limitation(s)

Not Applicable

S1-4. Emission Limitation(s)

A. Particulate matter (PM) emitted from this source shall not exceed 3.00 lb/hr on a daily average basis and 9.90 tons during any period of 12-consecutive months.

TAPCR 1200-03-07-.01(5) and the agreement letter dated July 18, 2022, from the permittee (Appendix 7)

Compliance Method:

(1) The permittee shall demonstrate compliance with the hourly PM emission limitation by calculating the actual PM emitted each hour, on a daily average basis, and maintain records of the emissions in the format in log 3 of Appendix 8, or an alternative format, which readily provides the same information. These logs shall be retained in accordance with **Condition G10**.

(2) The permittee shall demonstrate compliance with the annual PM emission limitation by calculating the actual PM emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the format in logs 4 and 5 of Appendix 8, or in an alternative format which readily provides the same information. These logs shall be retained in accordance with **Condition G10**.

B. Volatile organic compounds (VOC) emitted from this source shall not exceed 491.40 tons during any period of 12-consecutive months and shall utilize good work practice standards. This shall represent Best Available Control Technology (BACT) for this source.

TAPCR 1200-03-09-.01(4), TAPCR 1200-03-07-.07(2) and the agreement letter dated July 18, 2022, from the permittee (Appendix 7)

Compliance Method:

(1) The permittee shall demonstrate compliance with the annual VOC limit by calculating actual emissions of VOCs and HAPs (using the emission factors below) emitted during each calendar month and each period of 12-consecutive months and maintain records of the emissions in the format found in logs 1 and 2 of Appendix 8, or in an alternative format which readily provides the same information. These logs shall be retained in accordance with **Condition G10**.

- Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of **3.29×10^{-5}** lb TDI emitted per lb of TDI used. This emission factor is based on a source test performed on October 1, 1997.
- Diethanolamine (DEOA) emissions shall be calculated using the emission factor of **7.94×10^{-6}** lb DEOA emitted per lb of DEOA used. This emission factor is based on a source test performed on October 1, 1997.
- Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of **9.39×10^{-6}** lb MDI emitted per lb of MDI used. This emission factor is based on a source test performed on October 1, 1997.

(2) The permittee shall assure compliance with good work practice standards by conducting and recording the following work practice activities to ensure VOC emissions are minimized and reduced. These records shall be retained in accordance with **Condition G10**. These activities are outlined in Adient's ISO 14001 Environmental Management System (EMS) Policies as well as internal Standard Work Guidelines:

- All VOC containing mold release containers shall remain closed until such time the container is in process of preparation for and ready for use.
- Inventory storage of VOC containing mold release containers shall consist of a controlled access area complete with spill containment.
- Mold release material shall be transferred from tank storage to end point discharge via a fully contained and closed loop piping conveyance system.
- In the event of an inadvertent failure of the closed loop conveyance system resulting in the incidental release of mold release material, as referenced within Adient Pulaski's internal Plant Emergency Operations Plan, the onsite Spill Response Team shall be notified immediately and shall mitigate the spill in a manner which reduces potential fugitive VOC emissions.

- End point usage of VOC containing mold release material shall be monitored regularly as outlined within Adient Pulaski's internal work instructions and standard operating procedures.
- Utilizing the ISO14001 EMS Environmental Objectives Form, or the Adient continuous improvement platform, plant personnel shall participate in regular mold release tracking activities. These records shall be retained in accordance with **Condition G10**.

The above measures are instituted by way of the internal ISO program for continuous improvement and are collectively considered good management practices at the time of permit issuance. Improvements and the ongoing potential for continuous improvement may require updates of these procedures and environmental objectives. If Adient Pulaski revises the above measures, the permittee shall provide written notification to the Division at least 30 days prior to the change.

S1-5. Source-Specific Visible Emissions Limitation(s)

Not Applicable

(end of conditions)

The permit application gives the location of this source as 36º13'46.41" N Latitude and 87º04'14.41" W Longitude.

Appendix 1: Notification of Change in Responsible Person

Facility (Permittee): Adient US LLC

Facility ID: 28-0076

Former Responsible Person: _____ _____
Name Title

New Responsible Person: _____ _____
Name Title

_____
Email

Date New Responsible Person was assigned this duty: _____

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 2: Notification of Changes

Facility (Permittee): Adient US LLC

Facility ID: 28-0076

Source Number:

	Control Equipment	Stack Height (Feet)	Stack Diameter (Feet)	Exit Velocity (Feet/Second)	Exit Temperature (°F)
Current					
Proposed					
Current					
Proposed					
Current					
Proposed					

Comments:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

Appendix 3: Notification of Ownership Change

Facility (Permittee): Adient US LLC (Previous Owner)

Facility ID: 28-0076

Facility (Permittee): _____ (New Owner)

Email Address: _____

Secretary of State Control Number: _____ [as registered with the TN Secretary of State]

Date of Ownership Change: _____

Comments:

As the responsible person for the new owner or operator of the above mentioned facility (permittee):

- I agree to not make any changes to the stationary source(s) that meet the definition of modification as defined in Division 1200-03 or Division 0400-30[1], and
- I agree to comply with the conditions contained in **the permits listed below**, Division 1200-03 and Division 0400-30 of the Tennessee Air Pollution Control Regulations, the Tennessee Air Quality Act, and any documented agreements made by the previous owner to the Technical Secretary.

List all active permits issued to the facility for which the owner wishes to assume ownership:

As the Responsible Person of the above mentioned facility (permittee), I certify that the information contained in this Notification is accurate and true to the best of my knowledge. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Signature		Date
Signer's name (print)	Title	Phone (with area code)

[1] Appropriate application forms must be submitted prior to modification of the stationary source(s).

Appendix 4: Startup Certification

Not Applicable

Appendix 5: Fees

Not Applicable

Appendix 6: Emission Statement for VOC and NO_X

Not Applicable

Appendix 7: Agreement Letter

1890 Mines Road
Pulaski, Tennessee 38478
Tel 931.363.5666 Fax 931.424-6722

July 18, 2022

Michelle B. Owenby, Technical Secretary
Attn: West Tennessee Permit Program
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN. 37243

Facility Owner/Company Name:	Adient US LLC Pulaski
Facility Address:	1890 Mines Road, Pulaski, TN.
Emission Source Reference Number:	28-0076
Title V Permit Number:	569269 including Minor Modification #1

Ms. Owenby,

This letter is being submitted at the request of the Tennessee Department of Environment and Conservation (TDEC) and serves as an agreement by Adient US LLC Pulaski (Adient) to establish volatile organic (VOC) and particulate matter (PM_{10}) emission limits from the foam molding operations as represented in whole or part in the construction permit application dated March 30, 2022. Notwithstanding this agreement, Adient retains the right and opportunity to review and comment on all draft construction permit terms and conditions available ahead of the public comment period and during the public comment period and to utilize any appeal right it may have with respect to any terms or conditions it does not believe are appropriate.

As a part of this major PSD air permit request, Adient seeks to increase its production rates. The agreed upon emission rates are summarized in Table 1.

Table 1. Maximum Air Contaminant Emission Rates

Air Contaminant	Maximum Emission Rate
VOC	491.4 tons per year as calculated across a consecutive rolling 12-month basis
PM_{10}	9.9 tons per year and 3.0 pounds per hour

The annual VOC and PM_{10} emission rates are based on the maximum potential emission rates generated by the foam molding operations excluding insignificant sources and exempt sources at the facility. The annual VOC and PM_{10} emission rates are calculated for an entire year and are considered the mass emissions as averaged over a period of 12 consecutive months.

The Significant Emissions Rate (SER) for PM_{10} is 15 tons per year (tpy). Adient is proposing a maximum PM_{10} emission rate of 9.9 tpy. Consequently, the SER will not be exceeded. In regard to the requirement to impose shorter term limits on PM_{10} emissions, Adient proposes a limit on PM_{10} emissions at a rate of 3.0 pounds per hour (lb/hour) to allow for operational flexibility and production variability routinely experienced during certain periods of time in any given month or year. Adient recognizes that at a maximum PM_{10} emission rate of 3.0 lb/hour,

Adient – PUBLIC

the annual PM_{10} emission rate would otherwise be greater than 9.9 tpy. A maximum emission rate of, or potential to emit (PTE) PM_{10} at 3.0 lb/hr based upon sustained emissions over 8,760 hours would equate to 13.14 tpy, which remains below the SER of 15 tons per year for PM_{10}. However, Adient is voluntarily accepting an annual restriction/limit on PM_{10} emissions of 9.9 tpy. The combination of the longer-term annual PM_{10} emissions rate with the projected and slightly higher hourly equivalent PM_{10} emissions rate will:

1) Provide for a significant decrease in currently allowed particulate matter emissions from the process;
2) Cap annual emission at slightly less than two-thirds of the SER for PM_{10}; and
3) Provide necessary production flexibility while also allowing for seasonality and business/production variations.

Adient will demonstrate compliance with the above-referenced VOC and PM10 emission limits by the following methods already in place and required by the facility's current Title V operating permit no. 569269 including Minor Modification #1.

Table 2. Compliance Demonstration (Abbreviated)

Permit Condition No.	Compliance Demonstration	Regulatory Reference
E3-1	Visible emissions at this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).	TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6), EPA Test Method 9
E3-2 and E-3	Maintenance of Safety Data Sheets (SDSs) and Material Safety Data Sheets (MSDSs) as well as other documentation (e.g. manufacturer/supplier formulation data, technical data sheets, environmental data sheets) for purposes of a mass balance calculation of emissions.	TAPCR 1200-03-10-.02(2)(a)
E3-13	Regarding recordkeeping of logs, the following is applicable: a) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required. b) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 7 days from the end of the week for which the data is required. c) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 7 days from the end of the day for which the data is required.	TAPCR 1200-03-10-.02(2)(a)
E3-15	For purposes of compliance with Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) emissions limits in this permit, the following logs	TAPCR 1200-03-10-.02(2)(a)

Permit Condition No.	Compliance Demonstration	Regulatory Reference
	(LOG 1 and LOG 2) shall be used. These logs shall contain all volatile emissions excluding water and/or exempt compounds and also shall contain all HAPs. Logs in an alternate format providing the same information may be used. Records shall also be retained to verify the HAP content of each material. This may include MSDS, formulation data, or other documentation to establish the HAP content. These logs and records must be retained for a period of not less than five years and shall be reported in accordance with **Condition E2** of this permit. Also, these logs shall include records of VOC or HAP emissions from any source which is considered to be insignificant or exempt under the provisions of TAPCR 1200-03-09-.04.	
E4-2	Volatile organic compounds (VOC) emitted from this source shall not exceed **491.4** tons during all intervals of twelve (12) **(MM1)** consecutive months. **Compliance Method:** The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and during each twelve consecutive (12) month period. The permittee shall maintain records of these emissions in a form that readily shows compliance with this condition. (See **Logs 1 and 2** of **Condition E3-15** for an example) These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or representative thereof. These logs must also be reported in accordance with **Condition E2** of this permit and be retained for a period of not less than five (5) years. • Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of **3.29 x 10-5** lb TDI emitted per lb of TDI used. This emission factor is based on a source test performed on October 1, 1997. • Diethanolamine (DEOA) emissions shall be calculated using the emission factor of **7.94 x 10-6** lb DEOA emitted per lb of DEOA used. This emission factor is based on a source test performed on October 1, 1997. • Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of **9.39 x 10-6** lb MDI emitted per lb of MDI used. This emission factor is based on a source test performed on October 1, 1997.	TAPCR 1200-03-07-.07(2)
New permit condition	The permittee shall calculate the actual quantities of PM_{10} emitted from this facility on a daily basis, and based on the daily data, calculate hourly emissions for each day. The permittee shall calculate the actual quantifies of PM_{10} emitted from this facility during	TBD

Permit Condition No.	Compliance Demonstration	Regulatory Reference
	each calendar month and during each twelve consecutive (12) month period.	

I, the undersigned, am the responsible official as defined in TAPCR 1200-3-9-.02(11)(d)4 of the Title V source for which this document is being submitted. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made, and data contained in this document are true, accurate, and complete.

Sincerely,

Ryan Speck
Plant Manager

Cc: Kris Patrick Foster, Adient; Ricki Palmer, Adient Ann O'Brien; SCS Engineers; Jeffrey M. Pfost, Environmental Partners, Inc.; Stephanie Taylor, SCS Engineers

Appendix 8: Example Logs

LOG 1 MONTHLY LOG FOR {28-0076-01} MONTH: _____ YEAR: _____

MATERIAL NAME	MATERIAL DENSITY (lb/gal)	USAGE (gal/month)	VOC CONTENT (lbs VOC/gal)	VOC EMITTED (tons/month)	TDI EMISSION FACTOR ($3.29x10^{-5}$ lb/lb)	TDI EMITTED (tons/month)	DEOA EMISSION FACTOR ($7.94x10^{-6}$ lb/lb)	DEOA EMITTED (tons/month)	MDI EMISSION FACTOR ($9.39x10^{-6}$ lb/lb)	MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
TOTALS											

LOG 2 12-MONTH -LOG FOR {28-0076-01}

MONTH/YEAR	VOC EMISSIONS (TONS per MONTH)	(*) VOC EMISSIONS (TONS per 12 MONTHS)	HAP-1 EMISSIONS (TONS per MONTH)	(*) HAP-1 EMISSIONS (TONS per 12 MONTHS)	HAP-2 EMISSIONS (TONS per MONTH)	(*) HAP-2 EMISSIONS (TONS per 12 MONTHS)	HAP-3 EMISSIONS (TONS per MONTH)	(*) HAP-3 EMISSIONS (TONS per 12 MONTHS)	TOTAL HAP EMISSIONS (TONS per MONTH)	(*) TOTAL HAP EMISSIONS (TONS per 12 MONTHS)
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

LOG 3 DAILY PM LOG FOR {28-0076-01} **Month:**_____ **Year:**_____

DAY	MATERIAL USAGE (lbs.)	PARTICULATE CONTENT (wt %)	TRANSFER EFFICIENCY (%)	HOURS OF OPERATION	*DAILY AVERAGE PM EMITTED (lbs./hr.)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					

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**Daily average PM emitted (lb/hr) = material usage (lbs) x particulate content (wt %) x (1- transfer efficiency (%)) / hours of operation*

LOG 4 MONTHLY PM LOG FOR {28-0076-01} MONTH: _____ YEAR: _____

MATERIAL NAME	USAGE (lb/month)	PARTICULATE CONTENT (wt %)	TRANSFER EFFICIENCY (%)	*PM EMITTED (tons/month)
TOTALS				

** PM emitted (ton/month) = material usage (lbs/month) x particulate content (wt %) x (1- transfer efficiency (%))*

LOG 5 12-MONTH -PM LOG FOR {28-0076-01}

MONTH/YEAR	PM EMISSIONS (TONS per MONTH)	*TOTAL PM EMISSIONS (TONS per 12 CONSECUTIVE MONTHS)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		

(*) The Tons per 12-consecutive Month value is the sum of the PM emissions in the 11 months preceding the month just completed + the PM emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

Appendix 9: General Provisions for 40 CFR Part 63, Subpart OOOOOO

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
§63.1	Applicability	Yes ☐ No ☒	
§63.2	Definitions	Yes ☐ No ☒	Definitions are modified and supplemented by§63.11419.
§63.3	Units and Abbreviations	Yes ☐ No ☒	
§63.4	Prohibited Activities and Circumvention	Yes ☐ No ☒	
§63.5	Preconstruction Review and Notification Requirements	Yes ☐ No ☒	
§63.6(a), (b), (c), (d)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes ☐ No ☒	
§63.6(e)(1)-(2)	Operation and Maintenance Requirements	Yes ☐ No ☒	
§63.6(e)(3)	Operation and Maintenance Requirements	Yes ☐ No ☒	Owners and operators of subpart OOOOOO affected sources are not required to develop and implement a startup, shutdown, and malfunction plan.
§63.6(f)- (g)	Compliance with Non-opacity Emission Standards	Yes ☐ No ☒	
§63.6 (h)	Compliance with Non-opacity Emission Standards	Yes ☐ No ☒	Subpart OOOOOO does not require opacity and visible emissions standards.
§63.6(i)- (j)	Compliance with Non-opacity Emission Standards	Yes ☐ No ☒	
§63.7	Performance Testing Requirements	Yes ☐ No ☒	Performance tests not required by subpart OOOOOO
§63.8	Monitoring Requirements	Yes ☐ No ☒	Continuous monitoring, as defined in subpart A, is not required by subpart OOOOOO
§63.9(a)-(d)	Notification Requirements	Yes ☐ No ☒	
§63.9(e)-(g)	Notification Requirements	Yes ☐ No ☒	

§63.9(h)	Notification Requirements	Yes ☐ No ☒	Subpart OOOOOO specifies Notification of Compliance Status requirements.
§63.9(i)-(j)	Notification Requirements	Yes ☐ No ☒	
§63.10(a)-(b)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	Subpart OOOOOO specifies Recordkeeping and Reporting requirements.
§63.10(c)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(d)(1)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(d)(2)-(3)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(d)(4)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(d)(5)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(e)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.10(f)	Recordkeeping and Reporting Requirements	Yes ☐ No ☒	
§63.11	Control Device Requirements	Yes ☐ No ☒	
§63.12	State Authorities and Delegations	Yes ☐ No ☒	
§63.13	Addresses	Yes ☐ No ☒	
§63.14	Incorporations by Reference	Yes ☐ No ☒	
§63.15	Availability of Information and Confidentiality	Yes ☐ No ☒	
§63.16	Performance Track Provisions	Yes ☐ No ☒	

TAPCR 1200-03-09-.03(8)