

Tracy Kefauver

From: Kris Patrick Foster <kris.patrick.foster@adient.com>
Sent: Tuesday, August 16, 2022 1:12 PM
To: Tracy Kefauver
Subject: [EXTERNAL] Requested clarification

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Tracy,

Please see clarification of TDI emissions factors:

The testing conducted on October 1, 1997 was specific to TDI and MDI from foam manufacturing. This is the most recent testing event representative of the foam types used by the Company. A more recent testing event at the company sites is not available for use.

Further, current formulations and process knowledge would indicate the emissions factors from the October 1997 testing, used to predict TDI and MDI emissions, are believed to provide the worst case emissions rates resulting in an overstatement and estimate of TDI and MDI emissions. Since the projected emissions for TDI and MDI are worst case and possibly an overstate of emission, the very low emission rates are believed a reasonable and conservatively high estimate for permitting purposes and provides an adequate margin of compliance with applicable regulations.



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