

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



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

Semi -Annual Report (October 1, 2021 – March 31, 2022); Adient
Emission Source Reference No. 28-0076, Permit # 569269

Technical Secretary:

This is a submission of the semi- annual report certification for Adient Inc. as required by
Condition E2 of the company's Title V Operating Permit No. 569269

Semi - Annual Report Certification

Facility Owner/Company Name:	Adient
Facility Address:	1890 Mines Road, Pulaski, TN.
Emission Source Reference Number:	28-0076
Title V Permit Number:	569269 Modification #1
Reporting Period:	October 1, 2021 – March 31, 2022
Report Deadline:	May 30, 2022

This report is required pursuant to TNAPCR 1200-3-9-.02 (11) (e) 1. (iii).

Attached are monthly use and emissions data formatted similar to Log 1 from the permit. Also attached is a summary of that data with the rolling 12-month total formatted similar to Log 2.

1. Adient Pulaski Plant recently received a minor modification to the Title V Permit. The facility has a new VOC limit of 308 tons.
2. Adient Pulaski Plant is in compliance with Title V Operating Permit emissions conditions as indicated by the attached reports. Pursuant to Condition E4-2(MM1), the facility has not exceeded the 308 ton limit for VOCs during the reporting period and is calculating the HAPs emissions using the required emissions factors.
3. Visible emission evaluation readings from Condition E3-2 were conducted on 1/6/2021
4. Adient is considered to be in compliance with the particulate emission rate per condition E3-2 because opacity is less than 20%. Visible Emission Evaluation was completed on January 6, 2021.

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,
Adient

A handwritten signature in black ink, appearing to read "Ryan Speck".

Ryan Speck
Plant Manager

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Pulaski, Tennessee 38478
Tel 931.363.5666 Fax 931.424-6722



LOG 1 FY22

Monthly log for (28-0076-01)

Month: October-21

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	7441.0	6.15	22.88							
Highlower HT 2011UV (Water Based) (trial)	8.31	0	0.000831	0.00							
Mold Release Agent USPO-19-035 (Trial)	6.5	452	6.2	1.40							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	490	0.00	0.00							
Surfactant (8724 LF)	7.98	1029	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1282	0.50	0.32							
DL-02596 Black	9.82	1408	0.00	0.00							
Jeffcat - ZF 20	7.07	192	0.00	0.00							
Catalyst Tegoanin 33	8.48	396	0.00	0.00							
YUKOL - 8331	9.07	465	0.00	0.00							
LH5261W UV	8.43	211	0.00	0.00							
BIOH 2828	8.40	1960	0.00	0.00							
Multanol 3901	8.40	4595	0.00	0.00							
Polyol (E833)	8.52	55535	0.00	0.00							
Polyol (E855)	8.76	64912	0.00	0.00							
V-360	9.05	4572	0.00	0.00							
TD-80	10.17	37141	10.17	0.01	0.00003290	0.00621					0.00621
Diethanolamine (DEQA)	9.11	996	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	2659	10.00	0.00012					0.00000939	0.00012	0.00012
TOTALS		185,801		24.78		0.00621		0.00004		0.00012	0.00637

LOG 1 FY22

Monthly log for (28-0076-01)

Month: November-21

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	7888.8	6.15	24.26							
Highlower HT 2011UV (Water Based) (Trial)	8.31	0	0.000831	0.00							
Mold Release Agent PU11517 (Trial)	6.5	0	6.02	0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	508	0.00	0.00							
Surfactant (8724 LF)	7.98	1095	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1274	0.50	0.32							
DL-02596 Black	9.82	1214	0.00	0.00							
Jeffcat - ZF 20	7.07	211	0.00	0.00							
Catalyst Tegoanin 33	8.48	410	0.00	0.00							
YUKOL - 8331	9.07	397	0.00	0.00							
LH5261W UV	8.43	201	0.00	0.00							
BIOH 2828	8.40	1818	0.00	0.00							
Multanol 3901	8.40	3187	0.00	0.00							
Polyol (E833)	8.52	55506	0.00	0.00							
Polyol (E855)	8.76	68505	0.00	0.00							
V-360	9.05	5472	0.00	0.00							
TD-80	10.17	38426	10.17	0.01	0.00003290	0.00643					0.00643
Diethanolamine (DEQA)	9.11	1037	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	2659	10.00	0.00012					0.00000939	0.00012	0.00012
TOTALS		189,874		24.75		0.00643		0.00004		0.00012	0.00659

LOG 1 FY22

Monthly log for (28-0076-01)

Month: December-21

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	6533.0	6.15	20.09							
Highlower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
USPO-19-035 (solvent trial)	6.5	0	6.15	0.00							
Paste Wax (H179K-7)	6.82	0	5.15	0.00							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	499	0.00	0.00							
Surfactant (8724 LF)	7.98	1068	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1273	0.50	0.32							
DL-02596 Black	9.82	1152	0.00	0.00							
Jeffcat - ZF 20	7.07	204	0.00	0.00							
Catalyst Tegoanin 33	8.48	409	0.00	0.00							
YUKOL - 8331	9.07	385	0.00	0.00							
LH5261W UV	8.43	106	0.00	0.00							
BIOH 2828	8.40	1872	0.00	0.00							
Multanol 3901	8.40	4110	0.00	0.00							
Polyol (E833)	8.52	53918	0.00	0.00							
Polyol (E855)	8.76	67300	0.00	0.00							
V-360	9.05	5017	0.00	0.00							
TD-80	10.17	37573	10.17	0.01	0.00003290	0.00629					0.00629
Diethanolamine (DEQA)	9.11	1023	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	2979	10.00	0.00014					0.00000939	0.00014	0.00014
TOTALS		185,421		11.2644		0.00629		0.00004		0.00014	0.00646

LOG 1 FY22

Monthly log for (28-0076-01)

Month: January-22

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	7441.0	6.15	22.88							
Highlower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	492	0.00	0.00							
Surfactant (8724 LF)	7.98	1639	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1713	0.50	0.43							
DL-02596 Black	9.82	1091	0.00	0.00							
Jeffcat - ZF 20	7.07	211	0.00	0.00							
Catalyst Tegoanin 33	8.48	398	0.00	0.00							
YUKOL - 8331	9.07	374	0.00	0.00							
LH5261W UV	8.43	211	0.00	0.00							
BIOH 2828	8.40	1531	0.00	0.00							
Multanol 3901	8.40	2771	0.00	0.00							
Polyol (E833)	8.52	52571	0.00	0.00							
Polyol (E855)	8.76	67448	0.00	0.00							
V-360	9.05	5697	0.00	0.00							
TD-80	10.17	39987	10.17	0.01	0.00003290	0.00619					0.00619
Diethanolamine (DEQA)	9.11	1354	7.74	0.0000			0.00000794	0.00005			0.00005
Diphenylmethane Diisocyanate (MDI)	10	2172	10.00	0.00010					0.00000939	0.00010	0.00010
TOTALS		184,166		23.48		0.00619		0.00005		0.00010	0.00634

LOG 1 FY22

Monthly log for (28-0076-01)

Month: February-22

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	8312.0	6.15	25.56							
Highlower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	538	0.00	0.00							
Surfactant (8724 LF)	7.98	1053	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	706	0.50	0.18							
DL-02596 Black	9.82	1091	0.00	0.00							
Jeffcat - ZF 20	7.07	256	0.00	0.00							
Catalyst Tegoanin 33	8.48	450	0.00	0.00							
YUKOL - 8331	9.07	417	0.00	0.00							
LH5261W UV	8.43	192	0.00	0.00							
BIOH 2828	8.40	923	0.00	0.00							
Multanol 3901	8.40	3418	0.00	0.00							
Polyol (E833)	8.52	58641	0.00	0.00							
Polyol (E855)	8.76	79760	0.00	0.00							
V-360	9.05	6126	0.00	0.00							
TD-80	10.17	41720	10.17	0.01	0.00003290	0.00698					0.00698
Diethanolamine (DEQA)	9.11	1494	7.74	0.0001			0.00000794	0.00005			0.00005
Diphenylmethane Diisocyanate 7304 (MDI)	10	2355	10.00	0.00011					0.00000939	0.00011	0.00011
TOTALS		207,517		25.91		0.00698		0.00005		0.00011	0.00714

LOG 1 FY22

Monthly log for (28-0076-01)

Month: March-22

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)	HAP 1 TDI EMITTED (tons/month)	DEQA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁶ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPs EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	11598.8	6.15	35.67							
Highlower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	885	0.00	0.00							
Surfactant (8724 LF)	7.98	1895	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1981	0.50	0.50							
DL-02596 Black	9.82	1715	0.00	0.00							
Jeffcat - ZF 20	7.07	401	0.00	0.00							
Catalyst Tegoanin 33	8.48	706	0.00	0.00							
YUKOL - 8331	9.07	570	0.00	0.00							
LH5261W UV	8.43	888	0.00	0.00							
BIOH 2828	8.40	3032	0.00	0.00							
Multanol 3901	8.40	4569	0.00	0.00							
Polyol (E833)	8.52	95039	0.00	0.00							
Polyol (E855)	8.76	121400	0.00	0.00							
V-360	9.05	9229	0.00	0.00							
TD-80	10.17	66896	10.17	0.01	0.00003290	0.01119					0.01119
Diethanolamine (DEQA)	9.11	1810	7.74	0.0001			0.00000794	0.00007			0.00007
Diphenylmethane Diisocyanate (MDI)	10	3152	10.00	0.00015					0.00000939	0.00015	0.00015
TOTALS		325,933		36.34		0.01119		0.00007		0.00015	0.01140

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LOG 2 FY22 YEARLY LOG FOR (28-0076-01) Semi-Annual Reports: Annual Report: 2022

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)
October-21	24.8	267.5	0.00621	0.06628	0.00004	0.00048	0.00012	0.00164	0.00637	0.06841
November-21	24.8	279.0	0.00643	0.06803	0.00004	0.00049	0.00012	0.00168	0.00659	0.07019
December-21	20.4	281.4	0.00629	0.06930	0.00004	0.00048	0.00014	0.00172	0.00646	0.07150
January-22	23.5	281.5	0.00619	0.06978	0.00005	0.00049	0.00010	0.00174	0.00634	0.07201
February-22	25.9	287.3	0.00698	0.07205	0.00005	0.00052	0.00011	0.00177	0.00714	0.07434
March-22	36.3	286.6	0.01119	0.07565	0.00007	0.00054	0.00015	0.00173	0.01140	0.07792
April-22	0.0	263.5	0.00000	0.06979	0.00000	0.00051	0.00000	0.00159	0.00000	0.07189
May-22	0.0	247.1	0.00000	0.06679	0.00000	0.00046	0.00000	0.00147	0.00000	0.06872
June-22	0.0	219.4	0.00000	0.06005	0.00000	0.00041	0.00000	0.00127	0.00000	0.06174
July-22	0.0	198.8	0.00000	0.05514	0.00000	0.00038	0.00000	0.00114	0.00000	0.05666
August-22	0.0	170.2	0.00000	0.04726	0.00000	0.00033	0.00000	0.00085	0.00000	0.04844
September-22	0.0	155.7	0.00000	0.04329	0.00000	0.00028	0.00000	0.00075	0.00000	0.04432