



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
(615) 532-0554 Voice or (615) 532-0614 FAX

April 22, 2022

Certified Article Number

9414 7266 9904 2198 3502 69

SENDER'S RECORD

Mr. Ryan Speck
Adient US, LLC
1890 Mines Road
Pulaski, Tennessee 38478

Re: Accidental Release Plan Annual Certification
Adient US, LLC
1890 Mines Road, Pulaski, Tennessee 38478
Emission Source Reference No. 28-0076-01 / Permit No. 569269 / Report Log No. 52505

Dear Mr. Speck:

On January 15, 2016, the Technical Secretary issued Title V Permit No. 569269 to your facility for the polyurethane automotive seat manufacturing operation located at 1890 Mines Road in Pulaski, Tennessee. Permit 569269 was modified on May 26, 2016, with Administrative Amendment #1 (AA1) and on November 21, 2016, with Minor Modification #1 (MM1).

Condition E3-10 of permit 569269 states:

Accidental Release Plan. In accordance with Section 112(r) of the Clean Air Act and 1200-03-32-.03(1) of Tennessee Air Pollution Control Regulations, the permittee has filed a copy of the accidental release plan for this facility. This plan has been filed with both EPA Region IV and the Tennessee Division of Air Pollution Control. The permittee shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. Such certification is due no later than January 31 for the preceding calendar year in accordance with 1200-03-32-.03(3) of TAPCR.

The annual submittal certifying that Adient US, LLC is properly following its accidental release plan should have been submitted to the Division no later than January 31, 2022. As of the date of this letter, the Division has not received the annual certification. By failing to comply with Condition E3-10 of permit 569269, you are in violation of 1200-03-09-.02(6) of the Tennessee Air Pollution Control Regulations (TAPCR).

Mr. Speck
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TAPCR 1200-03-09-.02(6) states, in pertinent part:

Operation of each air contaminant source shall be in accordance with the provisions and stipulations set forth in the operating permit, all provisions of these regulations, and all provisions of the Tennessee Air Quality Act.

Compliance with the Tennessee Air Quality Act, the Tennessee Code Annotated, and the Tennessee Air Pollution Control Regulations contribute to the protection of the health, welfare, and physical property of the people and are used to help maintain an equitable balance between the benefits of clean air and the economic cost of achieving clean air in our state.

If you have any information that proves the violation did not occur (i.e. not submitting annual accidental release plan certification), or if you have any additional information regarding these violations that you would like to submit, submit the information in writing to the Technical Secretary, William R. Snodgrass Tennessee Tower, 15TH Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee 37243 or e-mail the response letter to Air.Pollution.Control@TN.gov. To ensure that your information will be considered, it must be submitted within 20 days of your receipt of this **Notice of Violation**.

As corrective action, please submit the Annual Compliance Certification for the accidental release plan to the Division no later than 20 days upon receipt of this letter.

If you have questions regarding this matter, please contact Jill Pratt at (865) 594-5573 or via email at Jill.Pratt@tn.gov, and questions concerning the enforcement process should be directed via email to Air.Pollution.Control@TN.gov.

Sincerely,



James P. Johnson, P.E.
Deputy Director
Permitting & Regulatory Development