

## Tracy Kefauver

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**From:** Ferrando, Emily <Ferrando.Emily@epa.gov>  
**Sent:** Tuesday, September 13, 2022 2:03 PM  
**To:** Tracy Kefauver  
**Cc:** Tawanna Reid  
**Subject:** [EXTERNAL] RE: Adient Draft Permit Initial Comments

Hi Tracy,

Thank you for sending this over so quickly! With your changes below in red, we have no further comments on the Adient Draft permit at this time.

Thanks again for all your helpful communication throughout this application and permit review.

Best,  
Emily

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**From:** Tracy Kefauver <Tracy.Kefauver@tn.gov>  
**Sent:** Tuesday, September 13, 2022 2:58 PM  
**To:** Ferrando, Emily <Ferrando.Emily@epa.gov>  
**Cc:** Tawanna Reid <Tawanna.Reid@tn.gov>  
**Subject:** RE: Adient Draft Permit Initial Comments

Hi Emily,

Thank you for your review and comments. Please see my responses/resolutions in red below.

Feel free to contact me with any further questions.

Thanks,



**Tracy Kefauver** | TDEC-Environmental Protection Specialist 2  
Division of Air Pollution Control  
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<https://www.tn.gov/environment/permit-permits/permit-air-home.html>

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Internal Customers please complete our [customer satisfaction survey](#).

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**From:** Ferrando, Emily <[Ferrando.Emily@epa.gov](mailto:Ferrando.Emily@epa.gov)>  
**Sent:** Monday, September 12, 2022 1:26 PM

To: Tracy Kefauver <[Tracy.Kefauver@tn.gov](mailto:Tracy.Kefauver@tn.gov)>

Subject: [EXTERNAL] Adient Draft Permit Initial Comments

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Hi Tracy,

Thanks for taking the time to talk with me today! Below are written versions of the comments we discussed over the phone. Please let me know if you are planning to update the permit or include any of this information in the final determination and don't hesitate to reach out with any questions.

- PTE calculations for PM assume that the HVLP spray applicators have a transfer efficiency of 55%. No set transfer efficiency is given in the permit to calculate PM emissions. It is recommended to include either a value for the transfer efficiency of the equipment or a method of determining the appropriate transfer efficiency to be used in the logs. **Included the transfer efficiency of 55% in the logs for calculations**
- At the bottom of step 1 of the BACT analysis, it is stated that "*After further review, the Division proposes Adient utilize good work practice standards to reduce VOC emissions.*" It appears as though the intent behind this sentence is to add good work practices as one of the 8 control options proposed by the applicant since good work practices is not included. Since the first step of the BACT analysis is to identify all available control technologies and the control is not chosen until step five, it is recommended to update the sentence to read "*After further review, the Division proposes **to add** good work practice standards **to the list of control options under consideration** to reduce VOC emissions.*" This will clarify that the control is not chosen until the final step of BACT. **Incorporated wording as suggested**
- TDEC sent the EPA an email on 8/9/2022 that included additional information on PM emissions at the facility, source testing, and included an updated BACT cost calculation for the regenerative thermal oxidizer using a 2022 estimate from Adient. It is recommended to include this as an attachment in appendix E to ensure the permit record is complete. **Added to Appendix E. The document (dated August 8, 2022) is also available on the TDEC dataviewer.**

Thanks again,  
Emily

Emily Ferrando  
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EPA Region 4, Atlanta GA  
(404) 562-9042  
Pronouns: [she/her](#)