

Adient
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 (April 1, 2023 – September 30, 2023); Adient
Emission Source Reference No. 28-0076, Permit # 569269

Technical Secretary:

This is a submission of the semi- annual report certification for Adient US, LLC. 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:	April 1, 2023 – September 30, 2023
Report Deadline:	November 30, 2023

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 PSD Permit to Construct/Modify Air
Contaminant Source. The facility has a new VOC limit of 491 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 491 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.

Additional Certification:

On September 22, 2022, TDEC issued the facility PSD permit to construct Number 980244 allowing the Polyurethane foam production increases with associated emissions increases. Adient Pulaski will conduct dual certification notices until such time as the PSD permit has been rolled into the site Title V permit in keeping with Condition G7, and TAPCR 1200-03-09-.02(1), 1200-03-09-.02(11)(d)1(i)(V). Additional calculation sheets have been prepared and are presented to demonstrate actual emissions using the PSD permit Appendix 8 data referred as Log 3, Log 4, and Log 5 demonstrating compliance with the PM10 emission limits associated with Condition S1-4(A). Therefore, this additional certification includes the following PSD permit provisions:

Condition G12(A)	Visible Emissions:	Not more than 20% Opacity (with exceptions)
Condition G12(C)	Fugitive Emissions:	Not more than 10% Opacity
Condition F1-1B	VOC Limit:	Not more than 491.40 tons per 12-month period
Condition S1-4(A)	PM Limits:	Not more than 3.00 pounds per hour (daily average) Not more than 9.90 tons per 12-month rolling

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



Kris P. Foster
EHS Analyst

Adient

1890 Mines Road

Pulaski, Tennessee 38478

Tel 931.363.5666 Fax 931.424-6722



LOG 1 FY22 Monthly log for (28-0076-01)

Month: April-23

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 ⁻⁵ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁵ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPS EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	12814.0	6.15	39.40							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	15	5.15	0.04							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	876	0.00	0.00							
Surfactant (8724 LF)	7.98	882	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2618	0.50	0.65							
DL-02596 Black	9.82	1237	0.00	0.00							
Jeffcat - ZF 20	7.07	238	0.00	0.00							
Catalyst Tegoanin 33	8.48	686	0.00	0.00							
YUKOL - 8331	9.07	319	0.00	0.00							
LH5261W UV	8.43	906	0.00	0.00							
BIOH 2828	8.40	6819	0.00	0.00							
Multranol 3901	8.40	7179	0.00	0.00							
Polyol (E833)	8.52	82229	0.00	0.00							
Polyol (E855)	8.76	96965	0.00	0.00							
V-360	9.05	7407	0.00	0.00							
TD-80	10.17	55860	10.17	0.01	0.00003290	0.00935					0.00935
Diethanolamine (DEQA)	9.11	1023	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	4258	10.00	0.00020					0.00000939	0.00020	0.00020
TOTALS		282,331		40.11		0.00935		0.00004		0.00020	0.00958

LOG 1 FY22 Monthly log for (28-0076-01)

Month: May-23

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 ⁻⁵ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁵ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPS EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	14885.0	6.15	45.77							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		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	1145	0.00	0.00							
Surfactant (8724 LF)	7.98	1147	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	3481	0.50	0.87							
DL-02596 Black	9.82	1634	0.00	0.00							
Jeffcat - ZF 20	7.07	309	0.00	0.00							
Catalyst Tegoanin 33	8.48	888	0.00	0.00							
YUKOL - 8331	9.07	357	0.00	0.00							
LH5261W UV	8.43	1236	0.00	0.00							
BIOH 2828	8.40	8943	0.00	0.00							
Multranol 3901	8.40	7851	0.00	0.00							
Polyol (E833)	8.52	108042	0.00	0.00							
Polyol (E855)	8.76	122489	0.00	0.00							
V-360	9.05	8756	0.00	0.00							
TD-80	10.17	73995	10.17	0.01	0.00003290	0.01238					0.01238
Diethanolamine (DEQA)	9.11	1660	7.74	0.0001			0.00000794	0.00006			0.00006
Diphenylmethane Diisocyanate (MDI)	10	4328	10.00	0.00020					0.00000939	0.00020	0.00020
TOTALS		362,146		46.65		0.01238		0.00006		0.00020	0.01264

LOG 1 FY22 Monthly log for (28-0076-01)

Month: June-23

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 ⁻⁵ lb/lb)	HAP 2 DEQA EMITTED (tons/month)	MDI EMISSION FACTOR (9.39X10 ⁻⁵ lb/lb)	HAP 3 MDI EMITTED (tons/month)	TOTAL HAPS EMITTED (tons/month)
Mold Release Agent (solvent based) PU11434	6.5	14290.0	6.15	43.94							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		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	843	0.00	0.00							
Surfactant (8724 LF)	7.98	839	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2547	0.50	0.64							
DL-02596 Black	9.82	1184	0.00	0.00							
Jeffcat - ZF 20	7.07	227	0.00	0.00							
Catalyst Tegoanin 33	8.48	652	0.00	0.00							
YUKOL - 8331	9.07	175	0.00	0.00							
LH5261W UV	8.43	990	0.00	0.00							
BIOH 2828	8.40	6566	0.00	0.00							
Multranol 3901	8.40	4482	0.00	0.00							
Polyol (E833)	8.52	78118	0.00	0.00							
Polyol (E855)	8.76	89867	0.00	0.00							
V-360	9.05	7079	0.00	0.00							
TD-80	10.17	56271	10.17	0.01	0.00003290	0.00941					0.00941
Diethanolamine (DEQA)	9.11	1088	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	2804	10.00	0.00013					0.00000939	0.00013	0.00013
TOTALS		268,022		44.59		0.00941		0.00004		0.00013	0.00958

LOG 1 FY22

Monthly log for (28-0076-01)

Month: July-23

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)	DEOA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEOA 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	8981.7	6.15	27.62							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		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	627	0.00	0.00							
Surfactant (8724 LF)	7.98	615	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1853	0.50	0.46							
DL-02596 Black	9.82	851	0.00	0.00							
Jeffcat - ZF 20	7.07	161	0.00	0.00							
Catalyst Tegoanin 33	8.48	487	0.00	0.00							
YUKOL - 8331	9.07	209	0.00	0.00							
LH5261W UV	8.43	595	0.00	0.00							
BIOH 2828	8.40	4811	0.00	0.00							
Multranol 3901	8.40	3533	0.00	0.00							
Polyol (E833)	8.52	58041	0.00	0.00							
Polyol (E855)	8.76	66644	0.00	0.00							
V-360	9.05	4933	0.00	0.00							
TD-80	10.17	38141	10.17	0.01	0.00003290	0.00638					0.00638
Diethanolamine (DEOA)	9.11	889	7.74	0.0000			0.00000794	0.00003			0.00003
Diphenylmethane Diisocyanate (MDI)	10	2041	10.00	0.00010					0.00000939	0.00010	0.00010
TOTALS		193,413		28.09		0.00638		0.00003		0.00010	0.00651

LOG 1 FY22

Monthly log for (28-0076-01)

Month: August-23

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)	DEOA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEOA 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	12052.0	6.15	37.06							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		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	960	0.00	0.00							
Surfactant (8724 LF)	7.98	970	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2930	0.50	0.73							
DL-02596 Black	9.82	1350	0.00	0.00							
Jeffcat - ZF 20	7.07	277	0.00	0.00							
Catalyst Tegoanin 33	8.48	767	0.00	0.00							
YUKOL - 8331	9.07	49	0.00	0.00							
LH5261W UV	8.43	906	0.00	0.00							
BIOH 2828	8.40	6127	0.00	0.00							
Multranol 3901	8.40	6257	0.00	0.00							
Polyol (E833)	8.52	91779	0.00	0.00							
Polyol (E855)	8.76	105685	0.00	0.00							
V-360	9.05	8010	0.00	0.00							
TD-80	10.17	61579	10.17	0.01	0.00003290	0.01030					0.01030
Diethanolamine (DEOA)	9.11	773	7.74	0.0000			0.00000794	0.00003			0.00003
Diphenylmethane Diisocyanate (MDI)	10	4188	10.00	0.00020					0.00000939	0.00020	0.00020
TOTALS		304,659		37.80		0.01030		0.00003		0.00020	0.01053

LOG 1 FY22

Monthly log for (28-0076-01)

Month: September-23

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)	DEOA EMISSION FACTOR (7.94X10 ⁻⁶ lb/lb)	HAP 2 DEOA 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	11532.0	6.15	35.46							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		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	757	0.00	0.00							
Surfactant (8724 LF)	7.98	817	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2436	0.50	0.61							
DL-02596 Black	9.82	1140	0.00	0.00							
Jeffcat - ZF 20	7.07	222	0.00	0.00							
Catalyst Tegoanin 33	8.48	698	0.00	0.00							
YUKOL - 8331	9.07	509	0.00	0.00							
LH5261W UV	8.43	741	0.00	0.00							
BIOH 2828	8.40	3212	0.00	0.00							
Multranol 3901	8.40	5466	0.00	0.00							
Polyol (E833)	8.52	82350	0.00	0.00							
Polyol (E855)	8.76	87391	0.00	0.00							
V-360	9.05	7038	0.00	0.00							
TD-80	10.17	56064	10.17	0.01	0.00003290	0.00938					0.00938
Diethanolamine (DEOA)	9.11	1583	7.74	0.0001			0.00000794	0.00006			0.00006
Diphenylmethane Diisocyanate (MDI)	10	3568	10.00	0.00017					0.00000939	0.00017	0.00017
TOTALS		265,524		36.08		0.00938		0.00006		0.00017	0.00960

Adient
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Pulaski, Tennessee 38478
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LOG 2 FY23 YEARLY LOG FOR (28-0076-01) Semi-Annual Reports: Annual Report: 2023

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-22	40.4	343.5	0.00923	0.10132	0.00004	0.00057	0.00012	0.00147	0.00939	0.10336
November-22	41.8	360.6	0.01087	0.10576	0.00007	0.00061	0.00014	0.00148	0.01108	0.10786
December-22	34.9	375.1	0.00670	0.10617	0.00004	0.00061	0.00008	0.00142	0.00681	0.10820
January-23	36.5	388.1	0.00793	0.10791	0.00004	0.00060	0.00011	0.00143	0.00808	0.10994
February-23	36.4	398.6	0.00929	0.11023	0.00004	0.00058	0.00013	0.00145	0.00946	0.11226
March-23	45.7	408.0	0.01286	0.11190	0.00005	0.00056	0.00022	0.00152	0.01313	0.11398
April-23	40.1	421.4	0.00935	0.11433	0.00004	0.00053	0.00020	0.00161	0.00958	0.11648
May-23	46.7	440.0	0.01238	0.11877	0.00006	0.00054	0.00020	0.00170	0.01264	0.12102
June-23	44.6	453.9	0.00941	0.11666	0.00004	0.00054	0.00013	0.00169	0.00958	0.11888
July-23	28.1	459.1	0.00638	0.11597	0.00003	0.00054	0.00010	0.00169	0.00651	0.11820
August-23	37.8	467.6	0.01030	0.11478	0.00003	0.00052	0.00020	0.00174	0.01053	0.11704
September-23	36.1	469.0	0.00938	0.11408	0.00006	0.00053	0.00017	0.00179	0.00960	0.11640

Apr-23		
LOG 3		
Emission Calculations		
VOCs	PM₁₀	
(lbs/day)	(lbs/day)	(lbs/hr)
3,122.1	30.7	1.3
2,044.6	20.1	0.8
4,046.1	39.8	1.7
3,818.1	37.6	1.6
3,991.3	39.3	1.6
3,503.9	34.5	1.4
4,056.2	39.9	1.7
3,773.4	37.1	1.5
4,100.1	40.4	1.7
3,765.6	37.1	1.5
3,862.9	38.0	1.6
3,956.2	38.9	1.6
3,869.1	38.1	1.6
3,523.3	34.7	1.4
3,781.8	37.2	1.6
3,569.0	35.1	1.5
2,210.6	21.8	0.9
3,215.7	31.7	1.3
3,855.3	38.0	1.6
3,627.3	35.7	1.5
3,204.9	31.5	1.3
3,610.0	35.5	1.5
2,863.8	28.2	1.2
777.9	7.7	0.3
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
VOCs	PM₁₀	
82,149.1	808.7	
41.07	0.40	

May-23		
LOG 3		
Emission Calculations		
VOCs	PM₁₀	
(lbs/day)	(lbs/day)	(lbs/hr)
3,314.5	32.6	1.4
4,079.6	40.2	1.7
3,909.6	38.5	1.6
3,827.7	37.7	1.6
3,746.7	36.9	1.5
3,637.4	35.8	1.5
3,827.3	37.7	1.6
3,790.2	37.3	1.6
3,709.2	36.5	1.5
4,027.5	39.6	1.7
3,981.5	39.2	1.6
3,818.2	37.6	1.6
3,946.4	38.8	1.6
3,981.0	39.2	1.6
3,994.6	39.3	1.6
3,790.7	37.3	1.6
3,891.3	38.3	1.6
3,694.8	36.4	1.5
3,613.6	35.6	1.5
3,341.7	32.9	1.4
3,445.7	33.9	1.4
3,354.5	33.0	1.4
3,218.4	31.7	1.3
3,518.2	34.6	1.4
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
VOCs	PM₁₀	
89,460.2	880.7	
44.73	0.44	

Jun-23		
LOG 3		
Emission Calculations		
VOCs	PM₁₀	
(lbs/day)	(lbs/day)	(lbs/hr)
3,545.5	34.9	1.5
3,314.6	32.6	1.4
3,395.7	33.4	1.4
3,913.5	38.5	1.6
3,422.7	33.7	1.4
3,076.7	30.3	1.3
3,736.3	36.8	1.5
3,722.6	36.6	1.5
3,232.4	31.8	1.3
3,763.6	37.1	1.5
3,681.3	36.2	1.5
3,870.8	38.1	1.6
3,728.1	36.7	1.5
3,436.2	33.8	1.4
3,763.0	37.0	1.5
4,144.3	40.8	1.7
4,008.4	39.5	1.6
3,891.0	38.3	1.6
3,913.3	38.5	1.6
3,369.1	33.2	1.4
3,667.7	36.1	1.5
3,586.1	35.3	1.5
3,626.9	35.7	1.5
1,266.1	12.5	0.5
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
0.0	0.0	0.0
VOCs	PM₁₀	
85,075.9	837.5	
42.54	0.42	

