

From: [Air.Pollution.Control](#)
To: [APC Permitting](#)
Subject: FW: Title V Renewal Pkg Source: 28-0076
Date: Monday, June 15, 2020 9:25:53 AM
Attachments: [image001.png](#)
[Title V Permit Renewal Pkg..pdf](#)

From: Kris Patrick Foster <kris.patrick.foster@adient.com>
Sent: Monday, June 15, 2020 08:13
To: Air.Pollution.Control <Air.Pollution.Control@tn.gov>
Subject: [EXTERNAL] Title V Renewal Pkg Source: 28-0076

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Please find attached the **revised** and replacement of the previously submitted Title V Permit Renewal package for Adient Pulaski, Title V Permit Number 56269 Emission Source Reference Number 28-0076. Please utilize this Permit Renewal package and disregard the previously submitted package.

Please feel free to call or email me at any time should you have any questions or concerns.

Thank you,



Kris Foster
Environmental, Health and Safety Lead

1890 Mines Road
Pulaski, TN 38478
Cell: 931-638-5918
Office: 931-424-7848

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

June 11, 2020

Ms. Owenby,

In accordance with 1200-03-09-.0211) of TAPCR, please find attached the Title V Permit Renewal application for Adient US LLC, as required by Condition A12 of the company's Title V Operating Permit No. 569269. This application for renewal is being submitted within the required due date (April 9, 2020 and July 18, 2020) as indicated in Permit No. 569269.

Please find enclosed a completed request to renew our site Title V air permit. During this renewal application process, Adient Pulaski is targeting an increase in Allowable AAP Emissions VOC's from the current 308 tons per AAP to 346 tons AAP. This application includes completed and applicable APC forms along with the appropriate certification of compliance signed by the responsible official.

Additional attachments to the package include a process flow diagram and air emissions calculations. As required, the application package includes the submission of Application Completeness Form APC 35 which documents the Title V checklist. We believe the complete application is timely to the Title V scheduled renewal and as such and with these enclosures, we believe the application package is complete and certified. In so doing we request an application shield for the renewal package.

Facility Owner/Company Name:	Adient US LLC Pulaski
Facility Address:	1890 Mines Road, Pulaski, TN.
Emission Source Reference Number:	28-0076
Title V Permit Number:	569269 including Minor Modification #1

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,

A handwritten signature in blue ink, appearing to read "Ryan Speck", is written over a light blue horizontal line.

Ryan Speck
Plant Manager



TITLE V PERMIT APPLICATION INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

Section 1: Identification and Diagrams		
This application contains the following forms:	APC Form 1, Facility Identification	1
	APC Form 2, Operations and Flow Diagrams	1

Section 2: Emission Source Description Forms		
		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 3, Stack Identification	1
	APC Form 4, Fuel Burning Non-Process Equipment	
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	
	APC Form 6, Storage Tanks	
	APC Form 7, Incinerators	
	APC Form 8, Printing Operations	
	APC Form 9, Painting and Coating Operations	
	APC Form 10, Miscellaneous Processes	1
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	
	APC Form 34, Open Burning	

Section 3: Air Pollution Control System Forms		
		Total number of this form
This application contains the following forms (one form for each control system in use at the facility):	APC Form 11, Control Equipment - Miscellaneous	
	APC Form 13, Adsorbers	
	APC Form 14, Catalytic or Thermal Oxidation Equipment	
	APC Form 15, Cyclones/Settling Chambers	
	APC Form 17, Wet Collection Systems	
	APC Form 18, Baghouse/Fabric Filters	

(OVER)

Section 4: Compliance Demonstration Forms

		Total number of this form
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	1
	APC Form 20, Continuous Emissions Monitoring	
	APC Form 21, Portable Monitors	
	APC Form 22, Control System Parameters or Operating Parameters of a Process	1
	APC Form 23, Monitoring Maintenance Procedures	
	APC Form 24, Stack Testing	
	APC Form 25, Fuel Sampling and Analysis	
	APC Form 26, Record Keeping	1
	APC Form 27, Other Methods	
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	1
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	1
	APC Form 30, Current Emissions Requirements and Status	1
	APC Form 31, Compliance Plan and Compliance Certification	1
	APC Form 32, Air Monitoring Network	

Section 5: Statement of Completeness and Certification of Compliance

I have reviewed this application in its entirety and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete. I have provided all the information that is necessary for compliance purposes and this application consists of _____ pages and they are numbered from page _____ to _____. The status of this facility's compliance with all applicable air pollution control requirements, including the enhanced monitoring and compliance certification requirements of the Federal Clean Air Act, is reported in this application along with the methods to be used for compliance demonstration.

Name and Title of Responsible Official


Telephone Number with Area Code

Ryan Speck

931-363-5666

Signature of Responsible Official

Date of Application



06/11/2020

(For definition of responsible official, see instructions for APC Form 1)

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 1

TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

SITE INFORMATION				
1. Organization's legal name Adient US LLC			For APC Use Only	APC company point no.
2. Site name (if different from legal name) Adient US LLC Pulaski				APC Log/Permit no.
3. Site address (St./Rd./Hwy.) 1890 Mines Road			NAICS or SIC Code 33451202	
City or distance to nearest town Pulaski		Zip code 38478-9504	County name Giles	
4. Site location (in Lat./Long.)	Latitude 36 13' 46.41" N		Longitude 87 04' 14.41" W	
CONTACT INFORMATION (RESPONSIBLE OFFICIAL)				
5. Responsible official contact Ryan Speck			Phone number with area code 931-363-5666	
6. Mailing address (St./Rd./Hwy.) 1890 Mines Road			Fax number with area code 931-363-5787	
City Pulaski	State TN	Zip code 38478	Email address ryan.speck@adient.com	
CONTACT INFORMATION (TECHNICAL)				
7. Principal technical contact Kris P. Foster			Phone number with area code 931-363-5666	
8. Mailing address (St./Rd./Hwy.) 1890 Mines Road			Fax number with area code 931-363-5787	
City Pulaski	State TN	Zip code 38478	Email address kris.patrick.foster@adient.com	
CONTACT INFORMATION (BILLING)				
11. Billing contact Rhonda Gardner			Phone number with area code 931-363-5666	
12. Mailing address (St./Rd./Hwy.) 1890 Mines Road			Fax number with area code 931-363-5787	
City Pulaski	State TN	Zip code 38478	Email address rhonda.b.garner@adient.com	
TYPE OF PERMIT REQUESTED				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>13. Permit requested for:</p> <p style="text-align: right;">Initial application to operate : <input type="checkbox"/></p> <p style="text-align: right;">Permit renewal to operate : <input checked="" type="checkbox"/></p> <p style="text-align: right;">Administrative permit amendment : <input type="checkbox"/></p> </div> <div style="width: 45%;"> <p style="text-align: right;">Minor permit modification : <input type="checkbox"/></p> <p style="text-align: right;">Significant modification : <input type="checkbox"/></p> <p style="text-align: right;">Construction permit : <input type="checkbox"/></p> </div> </div>				

(OVER)

HAZARDOUS AIR POLLUTANTS, DESIGNATIONS, AND OTHER PERMITS ASSOCIATED WITH FACILITY

14. Is this facility subject to the provisions governing prevention of accidental releases of hazardous air contaminants contained in Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?



Yes



No

If the answer is Yes, are you in compliance with the provisions of Chapter 1200-03-32 of the Tennessee Air Pollution Control regulations?



Yes



No

15. If facility is located in an area designated as "Non-Attainment" or "Additional Control", indicate the pollutant(s) for the designation.

Attainment for pollutants

16. List all valid Air Pollution permits issued to the sources contained in this application [identify all permits with most recent permit numbers and emission source reference numbers listed on the permit(s)].

569269 Title V Operating Permit (28-0076)

17. Page number :

2

Revision number:

Date of revision:



**TITLE V PERMIT APPLICATION
OPERATIONS AND FLOW DIAGRAMS**

1. Please list, identify, and describe briefly process emission sources, fuel burning installations, and incinerators that are contained in this application. Please attach a flow diagram for this application.

28-0076-01 Polyurethane Foam Manufacturing - production of polyurethane foam automotive seat cushions.

Foam cushions or buns are produced on one of three production lines. Molds are sprayed or hand applied with solvent or water-based mold release, they receive the reactant foam components, the molds are closed and the foam cures. Molds are opened after curing, cleaned, mold release is again applied and the process repeated. VOC and PM are primarily attributable to mold release materials and the use of mold maintenance materials.

2. List all insignificant activities which are exempted because of size or production rate and cite the applicable regulations.

Tank Farm (Closed Loop System)	1200-03-09-.04(5)(a)4(i)
Foam Crushing	1200-03-09-.04(5)(a)4(i)
Mold Cleaning	1200-03-09-.04(5)(a)4(i)
Parts Cleaning (Maintenance)	1200-03-09-.04(5)(f)76

3. Are there any storage piles?

YES _____ NO X

4. List the states that are within 50 miles of your facility.

Alabama

5. Page number:

Revision Number:

Date of Revision:

3

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554



APC 3

TITLE V PERMIT APPLICATION STACK IDENTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:

Adient US LLC Pulaski

2. Emission source (identify):

28-0076-01 Polyurethane Foam Manufacturing

STACK DESCRIPTION

3. Stack ID (or flow diagram point identification):

F1 through F12 (12 Identical Stacks)

4. Stack height above grade in feet:

33

5. Velocity (data at exit conditions):

33.5 (Actual feet per second)

6. Inside dimensions at outlet in feet:

4.0

7. Exhaust flowrate at exit conditions (ACFM):

22,250

8. Flow rate at standard conditions (DSCFM):

22,20

9. Exhaust temperature:

70 Degrees Fahrenheit (°F)

10. Moisture content (data at exit conditions):

0-1 Percent Grains per dry standard cubic foot (gr./dscf.)

11. Exhaust temperature that is equaled or exceeded during ninety (90) percent or more of the operating time (for stacks subject to diffusion equation only):

NA (°F)

12. If this stack is equipped with continuous pollutant monitoring equipment required for compliance, what pollutant(s) does this equipment monitor (e.g., Opacity, SO₂, NO_x, etc.)?

NA

Complete the appropriate APC form(s) 4, 5, 7, 8, 9, or 10 for each source exhausting through this stack.

BYPASS STACK DESCRIPTION

13. Do you have a bypass stack?

Yes ☐ No ☒

If yes, describe the conditions which require its use & complete APC form 4 for the bypass stack. Please identify the stack number(s) of flow diagram point number(s) exhausting through this bypass stack.

4. Page number:

Revision Number:

Date of Revision:



TITLE V PERMIT APPLICATION MISCELLANEOUS PROCESSES

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski	
2. Process emission source (identify): 28-0076-01 Polyurethane Foam Manufacturing	
3. Stack ID or flowdiagram point identification (s): F1 through F12	4. Year of construction or last modification: 2010 Last Modification
If the emissions are controlled for compliance, attach an appropriate Air Pollution Control system form.	
5. Normal operating schedule: 24 Hrs./Day 5 Days/Wk. 240 Days/Yr.	
6. Location of this process emission source in UTM coordinates: UTM Vertical : 3898.504 UTMHorizontal: 493.569	
7. Describe this process (Please attach a flow diagram of this process) and check one of the following: <input type="checkbox"/> Batch <input checked="" type="checkbox"/> Continuous	

PROCESS MATERIAL INPUT AND OUTPUT

8. List the types and amounts of raw materials input to this process:			
Material	Storage/Material handling process	Average usage (units)	Maximum usage (units)
See Attached Calculations			
9. List the types and amounts of primary products produced by this process:			
Material	Storage/Material handling process	Average usage (units)	Maximum usage (units)
10. Process fuel usage:			
Type of fuel	Max heat input (10 ⁶ BTU/Hr.)	Average usage (units)	Maximum usage (units)
11. List any solvents, cleaners, etc., associated with this process: Mold maintenance and cleaning materials			
If the emissions and/or operations of this process are monitored for compliance, please attach the appropriate Compliance Demonstration form.			
12. Describe any fugitive emissions associated with this process, such as out door storage piles, open conveyors, open air sand blasting, material handling operations, etc. (please attach a separate sheet if necessary). All emissions assumed to be point source.			
13. Page number: 5		Revision Number: 	
		Date of Revision: 	



TITLE V PERMIT APPLICATION
COMPLIANCE CERTIFICATION - MONITORING AND REPORTING
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

All sources that are subject to 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations are required to certify compliance with all applicable requirements by including a statement within the permit application of the methods used for determining compliance. This statement must include a description of the monitoring, recordkeeping, and reporting requirements and test methods. In addition, the application must include a schedule for compliance certification submittals during the permit term. These submittals must be no less frequent than annually and may need to be more frequent if specified by the underlying applicable requirement or the Technical Secretary.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski
2. Process emission source, fuel burning installation, or incinerator (identify): 28-0076-01 Polyurethane Foam Manufacturing
3. Stack ID or flow diagram point identification(s): F1 through F12

METHODS OF DETERMINING COMPLIANCE

4. This source as described under Item #2 of this application will use the following method(s) for determining compliance with applicable requirements (and special operating conditions from an existing permit). Check all that apply and attach the appropriate form(s)

- ☐ Continuous Emission Monitoring (CEM) - APC 20
 Pollutant(s): _____
- ☐ Emission Monitoring Using Portable Monitors - APC 21
 Pollutant(s): _____
- ☒ Monitoring Control System Parameters or Operating Parameters of a Process - APC 22
 Pollutant(s): Opacity: Visual Observation
- ☐ Monitoring Maintenance Procedures - APC 23
 Pollutant(s): _____
- ☐ Stack Testing - APC 24
 Pollutant(s): _____
- ☐ Fuel Sampling & Analysis (FSA) - APC 25
 Pollutant(s): _____
- ☒ Recordkeeping - APC 26
 Pollutant(s): PM and VOC
- ☐ Other (please describe) - APC 27
 Pollutant(s): _____

5. Compliance certification reports will be submitted to the Division according to the following schedule:

Start date: Per Title V Permit Requirements

And every 365 days thereafter.

6. Compliance monitoring reports will be submitted to the Division according to the following schedule:

Start date: Per Title V Permit Requirements

And every 365 days thereafter.

7. Page number: _____ Revision number: _____ Date of revision: _____

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554



APC 22

**TITLE V PERMIT APPLICATION - COMPLIANCE DEMONSTRATION BY
MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS**

The monitoring of a control system parameter or a process parameter shall be acceptable as a compliance demonstration method provided that a correlation between the parameter value and the emission rate of a particular pollutant is established.

GENERAL IDENTIFICATION AND DESCRIPTION

- | | |
|---|---|
| 1. Facility name:
Adient US LLC Pulaski | 2. Stack ID or flow diagram point identification(s)
F1 through F12 |
| 3. Emission source:
28-0076-01 Polyurethane Foam Manufacturing | |

MONITORING DESCRIPTION

- | |
|---|
| 4. Pollutant(s) being monitored:
Opacity |
| 5. Description of the method of monitoring and establishment of correlation between the parameter value and the emission rate of a particular pollutant:
Non-certified opacity observations or alternatively EPA Method 9 one time per year or more. |

- | |
|---|
| 6. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated):
Per TAPC Opacity Matrix dated June 18, 1996 (Updated March 13, 2007) |
|---|

- | | | |
|----------------------|------------------|-------------------|
| 7. Page number:
7 | Revision number: | Date of revision: |
|----------------------|------------------|-------------------|

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 26

TITLE V PERMIT APPLICATION COMPLIANCE DEMONSTRATION BY RECORDKEEPING

Recordkeeping shall be acceptable as a compliance demonstration method provided that a correlation between the parameter value recorded and the applicable requirement is established.

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski	2. Stack ID or flow diagram point identification(s): F1 through F12
3. Emission source (identify): 28-0076-01 Polyurethane Foam Manufacturing	

MONITORING AND RECORDKEEPING DESCRIPTION

4. Pollutant(s) or parameter being monitored: PM and VOC
5. Material or parameter being monitored and recorded: Material Usage and Material Formulation Data
6. Method of monitoring and recording: Monthly record of the actual usage of Polyurethane Foam Manufacturing materials. Emissions are estimated as follows: 1. PM - (Material Usage) x (PM content) x (Transfer Efficiency (for example 1-50%)) 2. VOC - (Material Usage) x (VOC content) 3. TDI, MDI, DEOA (lbs) - (Material Usage lbs) x (Emissions Factor) Note: TDI and MDI are reactants in the foam materials and consumed or locked into the matrix of the foam. TDI and MDI emission factors are from testing performed on October 1, 1997.
7. Compliance demonstration frequency (specify the frequency with which compliance will be demonstrated): Monthly calculation

8. Page number: 8	Revision number:	Date of revision:
----------------------	------------------	-------------------



TITLE V PERMIT APPLICATION

EMISSIONS FROM PROCESS EMISSION SOURCE / FUEL BURNING INSTALLATION / INCINERATOR

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski	2. Stack ID or flow diagram point identification(s): F1 through F12
3. Process emission source / Fuel burning installation / Incinerator (identify): 28-0076-01 Polyurethane Foam Manufacturing Note: Increase of Allowable AAP Emissions by 38 tons per AAP.	

EMISSIONS SUMMARY TABLE – CRITERIA AND FUGITIVE EMISSIONS

4. Complete the following emissions summary for regulated air pollutants. Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour - Item 8, APC 30)
			(2019)	
Particulate Matter (TSP)	113.5		15.47	
(Fugitive Emissions)				
Sulfur Dioxide				
(Fugitive Emissions)				
Volatile Organic Compounds	346		305	
(Fugitive Emissions)				
Carbon Monoxide				
(Fugitive Emissions)				
Lead				
(Fugitive Emissions)				
Nitrogen Oxides				
(Fugitive Emissions)				
Total Reduced Sulfur				
(Fugitive Emissions)				
Mercury				
(Fugitive Emissions)				

(Continued on next page)

(Continued from last page)

AIR POLLUTANT	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour - Item 8, APC 30)
Asbestos				
(Fugitive Emissions)				
Beryllium				
(Fugitive Emissions)				
Vinyl Chloride				
(Fugitive Emissions)				
Fluorides				
(Fugitive Emissions)				
Gaseous Fluorides				
(Fugitive Emissions)				
Greenhouse Gases in CO ₂ Equivalents				

EMISSIONS SUMMARY TABLE – FUGITIVE HAZARDOUS AIR POLLUTANTS

5. Complete the following emissions summary for regulated air pollutants that are hazardous air pollutant(s). Fugitive emissions shall be included. Attach calculations and emission factor references.

Air Pollutant & CAS	Maximum Allowable Emissions		Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour - Item 7, APC 30)	Tons per Year	Reserved for State use (Pounds per Hour - Item 8, APC 30)
TDI 26471-62-5			.105	
MDI 101-68-8			.00018	
DEOA 111-42-2			.00138	

6. Page number:

Revision number:

Date of revision



**TITLE V PERMIT APPLICATION
 EMISSION SUMMARY FOR THE FACILITY OR FOR THE
 SOURCES CONTAINED IN THIS APPLICATION**

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski

EMISSIONS SUMMARY TABLE – CRITERIA AND SELECTED POLLUTANTS

2. Complete the following emissions summary for regulated air pollutants at this facility or for the sources contained in this application.

Air Pollutant	Summary of Maximum Allowable Emissions		Summary of Actual Emissions	
	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)	Tons per Year	Reserved for State use (Pounds per Hour- Item 4, APC 28)
Particulate Matter (TSP)	113.5		15.47	
Sulfur Dioxide				
Volatile Organic Compounds	346		305	
Carbon Monoxide				
Lead				
Nitrogen Oxides				
Total Reduced Sulfur				
Mercury				
Asbestos				
Beryllium				
Vinyl Chlorides				
Fluorides				
Gaseous Fluorides				
Greenhouse Gases in CO ₂ Equivalents				

(Continued on next page)

3. Complete the following emissions summary for regulated air pollutants that are hazardous air pollutant(s) at this facility or for the sources contained in this application.

4. Page number: Revision number: Date of revision:

State of Tennessee
Department of Environment and Conservation
Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243
Telephone: (615) 532-0554



APC 30

**TITLE V PERMIT APPLICATION
CURRENT EMISSIONS REQUIREMENTS AND STATUS**

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name: Adient US LLC Pulaski	2. Emission source number 28-0076-01
---	--

3. Describe the process emission source / fuel burning installation / incinerator:
Polyurethane Foam Manufacturing

EMISSIONS AND REQUIREMENTS

4. Identify if only a part of the source is subject to this requirement	5. Pollutant	6. Applicable requirement(s): TN Air Pollution Control Regulations, 40 CFR, permit restrictions, air quality based standards	7. Limitation	8. Maximum actual emissions	9. Compliance status (In/Out)
	Particulate	Permit Condition E4-1	0.02 gr/dscf	<0.02 gr/dscf	IN
			26 lbs/hr	<26 lbs/hr	
	VOC	Permit Condition E4-2	308 tons per	<308 tons per	IN
			12 consecutive	12 consecutive	
			months	months	
	HAP	Individual HAP Compounds	10 tons	<10 tons	IN
	HAP	Permit Condition E3-12	25 tons	<25 tons	IN
	Opacity	Permit Condition E3-2	20% Opacity	<20% Opacity	IN

10. Other applicable requirements (new requirements that apply to this source during the term of this permit)

11. Page number: 13	Revision number:	Date of revision:
-------------------------------	------------------	-------------------



TITLE V PERMIT APPLICATION COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

GENERAL IDENTIFICATION AND DESCRIPTION

1. Facility name:
Adient US LLC Pulaski
2. List all the process emission source(s) or fuel burning installation(s) or incinerator(s) that are part of this application.
28-0076-01 Polyurethane Foam Seating Manufacturing

COMPLIANCE PLAN AND CERTIFICATION

3. Indicate that source(s) which are contained in this application are presently in compliance with all applicable requirements, by checking the following:
☒ A. Attached is a statement of identification of the source(s) currently in compliance. We will continue to operate and maintain the source(s) to assure compliance with all the applicable requirements for the duration of the permit.
☐ B. APC 30 form(s) includes new requirements that apply or will apply to the source(s) during the term of the permit. We will meet such requirements on a timely basis.
4. Indicate that there are source(s) that are contained in this application which are not presently in full compliance, by checking both of the following:
☐ A. Attached is a statement of identification of the source(s) not in compliance, non-complying requirement(s), brief description of the problem, and the proposed solution.
☐ B. We will achieve compliance according to the following schedule:

Action	Deadline

Progress reports will be submitted:

Start date: _____ and every 180 days thereafter until compliance is achieved.

5. State the compliance status with any applicable compliance assurance monitoring and compliance certification requirements that have been promulgated under section 114(a)(3) of the Clean Air Act as of the date of submittal of this APC 31.

Not Applicable

6. Page number: **14** Revision number: Date of revision:

State of Tennessee
 Department of Environment and Conservation
 Division of Air Pollution Control
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 15th Floor
 Nashville, TN 37243
 Telephone: (615) 532-0554



APC 35

TITLE V PERMIT APPLICATION APPLICATION COMPLETENESS CHECK LIST

Note to Applicants: The Application Completeness Check List is required by Division Rule 1200-03-09-.02(11)(d)1(ii)(I) and is used by Division staff to determine whether or not an application is complete. This checklist will be used to resolve any dispute between the applicant and the Division regarding the completeness of an application.

Section 1: Identification and Diagrams (APC 1 and APC 2)		
Requirement	Complete	Incomplete
Site Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contact Information (Responsible Official)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contact Information (Technical)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contact Information (Billing)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Type of Permit Requested	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Accidental Release Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Nonattainment/Additional Control Area Designation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List of Valid Permits	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List and description of process emission sources, fuel burning installations, and incinerators	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Flow diagram attached?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List of Insignificant Activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List of Storage Piles	<input checked="" type="checkbox"/>	<input type="checkbox"/>
List of States within 50 Miles	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Section 2: Emission Source Description Forms		
Forms are complete as received:		<input checked="" type="checkbox"/>
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>
Forms are incomplete (missing information on the following application forms):	APC Form 3, Stack Identification	<input type="checkbox"/>
	APC Form 4, Fuel Burning Non-Process Equipment	<input type="checkbox"/>
	APC Form 5, Stationary Gas Turbines or Internal Combustion Engines	<input type="checkbox"/>
	APC Form 6, Storage Tanks	<input type="checkbox"/>
	APC Form 7, Incinerators	<input type="checkbox"/>
	APC Form 8, Printing Operations	<input type="checkbox"/>
	APC Form 9, Painting and Coating Operations	<input type="checkbox"/>
	APC Form 10, Miscellaneous Processes	<input type="checkbox"/>
	APC Form 33, Stage I and Stage II Vapor Recovery Equipment	<input type="checkbox"/>
	APC Form 34, Open Burning	<input type="checkbox"/>

Section 3: Air Pollution Control System Forms

Forms are complete as received:		<input checked="" type="checkbox"/>
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>
Forms are incomplete (missing information on the following application forms):	APC Form 11, Control Equipment - Miscellaneous	<input type="checkbox"/>
	APC Form 13, Adsorbers	<input type="checkbox"/>
	APC Form 14, Catalytic or Thermal Oxidation Equipment	<input type="checkbox"/>
	APC Form 15, Cyclones/Settling Chambers	<input type="checkbox"/>
	APC Form 17, Wet Collection Systems	<input type="checkbox"/>
	APC Form 18, Baghouse/Fabric Filters	<input type="checkbox"/>

Section 4: Compliance Demonstration Forms

Forms are complete as received:		<input checked="" type="checkbox"/>
Forms are incomplete (one or more application forms not submitted)		<input type="checkbox"/>
Forms are incomplete (missing information on the following application forms):	APC Form 19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	<input type="checkbox"/>
	APC Form 20, Continuous Emissions Monitoring	<input type="checkbox"/>
	APC Form 21, Portable Monitors	<input type="checkbox"/>
	APC Form 22, Control System Parameters or Operating Parameters of a Process	<input type="checkbox"/>
	APC Form 23, Monitoring Maintenance Procedures	<input type="checkbox"/>
	APC Form 24, Stack Testing	<input type="checkbox"/>
	APC Form 25, Fuel Sampling and Analysis	<input type="checkbox"/>
	APC Form 26, Recordkeeping	<input type="checkbox"/>
	APC Form 27, Other Methods	<input type="checkbox"/>
	APC Form 28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	<input type="checkbox"/>
	APC Form 29, Emissions Summary for the Facility or for the Source Contained in This Application	<input type="checkbox"/>
	APC Form 30, Current Emissions Requirements and Status	<input type="checkbox"/>
	APC Form 32, Air Monitoring Network	<input type="checkbox"/>

Section 5: Statement of Completeness and Certification of Compliance

Requirement	Complete	Incomplete	Not Applicable
Certification of Truth, Accuracy, and Completeness (Form APC 1, Section 5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General Identification and Description (Form APC 31, Items 1 and 2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for Sources Currently in Compliance (Form APC 31, Item 3A)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compliance Certification for New Applicable Requirements (Form APC 31, Item 3B)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Identification of Sources Currently Not in Compliance (Form APC 31, Item 4A)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliance Schedule for Sources Currently Not in Compliance (Form APC 31, Item 4B)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliance Certification for Enhanced Monitoring (Form APC 31, Item 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Section 6: Miscellaneous Information

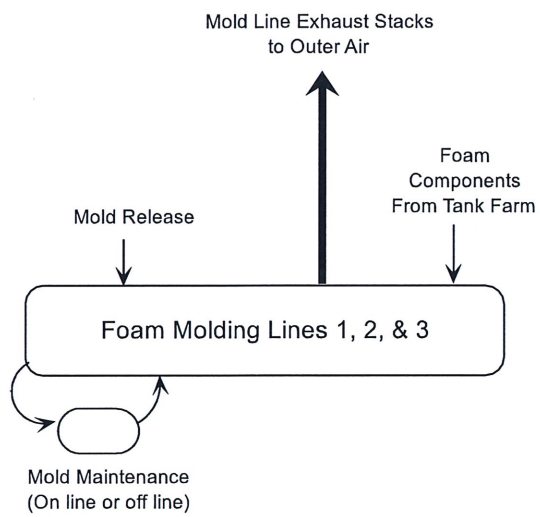
Item	Included	Not Included
For Title V modifications, is a description of the modification included?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Request for Permit Shield	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Calculations on which emissions-related information are based	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Identification of alternative operating scenarios, as applicable	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Explanation of any proposed exemptions from otherwise applicable requirements	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other information needed for completeness (explain in comments)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Section 7: Comments

Describe any missing information below or in a separate attachment:

Section 8: Application Completeness

Application is Complete	<input checked="" type="checkbox"/>
Application is Incomplete	<input type="checkbox"/>



Adient Pulaski
Process Flow Diagram

LOG 2 FY19

YEARLY LOG FOR (28-0076-01)

Semi-Annual Reports:

Annual Report:

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-18	25.5	257.2	0.01122	0.12060	0.00013	0.00159	0.00000	0.00000	0.01136	0.12219
November-18	19.0	254.7	0.00788	0.11673	0.00015	0.00157	0.00000	0.00000	0.00803	0.11830
December-18	17.5	254.8	0.00701	0.11635	0.00007	0.00152	0.00000	0.00000	0.00708	0.11787
January-19	23.8	256.8	0.00988	0.11528	0.00015	0.00152	0.00000	0.00000	0.01003	0.11679
February-19	23.6	259.3	0.00918	0.11360	0.00015	0.00154	0.00000	0.00000	0.00933	0.11514
March-19	22.4	261.5	0.00931	0.11282	0.00011	0.00151	0.00000	0.00000	0.00942	0.11433
April-19	27.1	269.0	0.01049	0.11314	0.00010	0.00146	0.00000	0.00000	0.01059	0.11459
May-19	21.6	264.0	0.00809	0.10994	0.00011	0.00140	0.00000	0.00000	0.00819	0.11134
June-19	29.8	271.4	0.00873	0.10862	0.00009	0.00134	0.00000	0.00000	0.00882	0.10996
July-19	32.1	282.2	0.00848	0.10770	0.00011	0.00137	0.00000	0.00000	0.00860	0.10907
August-19	37.0	299.2	0.00848	0.10730	0.00011	0.00137	0.00000	0.00000	0.00860	0.10867
September-19	25.5	305.0	0.00702	0.10577	0.00009	0.00139	0.00019	0.00019	0.00730	0.10734