

**From:** [Air.Pollution.Control](#)  
**To:** [APC Permitting](#)  
**Subject:** FW: Annual Compliance Certification Source #28-0076  
**Date:** Wednesday, November 30, 2022 9:16:55 AM  
**Attachments:** [TitleV-2022 Annual Compliance Report.pdf](#)

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**From:** Kris Patrick Foster <kris.patrick.foster@adient.com>  
**Sent:** Tuesday, November 29, 2022 7:07 PM  
**To:** APC ColuEFO <APC.ColuEFO@tn.gov>; Air.Pollution.Control <Air.Pollution.Control@tn.gov>  
**Cc:** Kris Patrick Foster <kris.patrick.foster@adient.com>; Ricki H Palmer <ricki.h.palmer@adient.com>  
**Subject:** [EXTERNAL] Annual Compliance Certification Source #28-0076

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Please see attached TAPCD Annual Compliance Certification, FY2022 for Adient US LLC Pulaski, Permit #569269 Source #28-0076. A hard copy of the attached document has been forwarded to US EPA Region IV also.

Regards,  
Kris P. Foster



**Kris P. Foster**  
***Environmental, Health and Safety Lead***  
**1890 Mines Road**  
**Pulaski, TN 38478**  
**Cell: 931-638-5918**  
**Office: 931-424-7848**

Adient – INTERNAL

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Michelle B. Owenby, Technical Secretary  
Attn: West Tennessee Permit Program  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, TN. 37243

RE: Annual Report (October 1, 2021 - September 30, 2022); Adient US, LLC. Emission  
Source Reference No. 28-0076, Permit # 569269

Technical Secretary:

This is the annual report certification for Adient US LLC as required by Condition E2 of the  
company's Title V Operating Permit No. 569269

### **ANNUAL CERTIFICATION OF COMPLIANCE**

Facility Owner/Company Name: Adient US LLC  
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 - September 30, 2022  
Report Deadline: November 29, 2022

This report is required pursuant to TNAPCR 1200-3-9-.02(11)(e)3(v)(III) and 40 CFR Part.  
70.6(c)(5)(iii) as amended in the Federal Register Vol.62, No.204, October 22, 1997, pages  
54946 and 54947.

#### **Annual Compliance Certification for Relevant Conditions of Sections A & B**

<b>Cndtn</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
A1.	Definitions	Descriptive Information.	Compliance method not specified
A2.	Compliance requirement. The permittee shall comply with all conditions of its permit.	In compliance, no deviations.	Continuous
A3.	Need to halt or reduce activity	No such action taken during reporting period.	Continuous

<b>Cndtn .</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
A4.	The permit. The permit may be modified, revoked, reopened, and reissued, or terminated for cause.	Minor Modification #1 applied for on 7/15/2016.	Continuous
A5.	Property rights	Descriptive Information.	Compliance method not specified
A6.	Submittal of requested information. The permittee shall furnish any information requested by the Technical Secretary.	No such requests during reporting period.	Continuous
A7.	Severability clause.	Descriptive Information.	Compliance method not specified
A8.	Fee payment	Fees Paid	Continuous
A9.	Permit revision not required	Descriptive Information.	Compliance method not specified
A10.	Inspection and entry	In compliance, no deviations.	Continuous
A11.	Permit shield	Descriptive Information.	Compliance method not specified
A12.	Permit renewal and expiration	January 15, 2016. Expires, January 14, 2021. Renewal, April 19, 2020 to July 18, 2020.	Continuous
A13.	Reopening for cause	No such action taken during reporting period.	Continuous
A14.	Permit transference	Administrative Amendment issued on May 26, 2016 for name change to Adient US LLC	Continuous
A15.	Air pollution alert	No known alerts during reporting period.	Continuous
A16.	Construction permit required	No such action taken during reporting period.	Continuous



<b>Cndtn .</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
A17.	Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes. (a) change in air pollution control equipment (b) change in stack height or diameter (c) change in exit velocity	No such changes planned during reporting period.	Continuous
A18.	Schedule of compliance. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance. . .	In compliance, no deviations.	Continuous
A19.	Title VI. The permittee shall comply with the standards for recycling and emissions reduction of CFCs.	In compliance, no deviations. Facility does not service MVACs.	Continuous
A20.	112 (r) – RMP compliance.	In compliance, no deviations	Continuous
B1.	Recordkeeping	Records maintained on site.	Continuous
B2.	Retention of monitoring data	Records retained on site.	Continuous
B3.	Reporting	Reports submitted on time.	Continuous
B4.	Certification	Reports signed by Responsible Official.	Continuous
B5.	Annual compliance certification	Annual Compliance submitted on time.	Continuous
B6.	Submission of compliance certification	Compliance Certification submitted to TDEC and EPA.	Continuous
B7.	Emergency provisions	No such action taken during reporting period.	Continuous

<b>Cndtn .</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
B8.	Excess emissions reporting	No such action taken during reporting period	Continuous
B9.	Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions	No such action taken during reporting period	Continuous
B10.	Sources located in non-attainment areas or having significant impact on air quality in a non-attainment area.	Source is not located in non-attainment area	Continuous
D1.	Visible emissions - The permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of 20%.	No excess visible emissions during reporting period.	Continuous
D2.	General provisions and applicability for non-process gaseous emissions	No such action taken during reporting period	Continuous
D3.	Non-process emission standards	In compliance, no deviations.	Continuous
D4.	General provisions and applicability for process gaseous emissions	In compliance, no deviations.	Continuous
D5.	Particulate emissions from process emission sources	In compliance, no deviations.	Continuous
D6.	Sulfur dioxide emission standards	In compliance, no deviations.	Continuous
D7.	Fugitive Dust	All roadways are paved.	Continuous
D8.	Open burning	Facility does not engage in open burning.	Continuous
D9.	Asbestos	N/A. There is no asbestos on site.	Continuous
D10.	Annual certification of compliance	Annual Compliance submitted on time.	Continuous
E1	Fee Payments: allowable emissions basis	In Compliance - fees paid in full	Continuous
E2	Reporting requirements: (a) Semiannual Reports (b) Annual Compliance Certification	(a) Semi Annual reports submitted on time (b) Annual reports submitted on time.	Continuous



<b>Cndtn .</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
E3-1	Identification of Responsible Official and Technical Contact	Facility contact information up to date and maintained.	Continuous
E3-2	Visible emissions shall not exceed 20% opacity pursuant to 1200-3-5-.03(6) –	Last Visible Emissions performed on 01/2021.	Continuous
E3-3	Recordkeeping of VOC and HAP containing materials used and SDS -	VOC and HAP documentation maintained on site.	Continuous
E3-4	SDS or other documentation which show percent (%) VOC by weight For all VOC and HAP containing Materials	VOC and HAP documentation maintained on site.	Continuous
E3-5	Fugitive Dust Emissions	All roadways are paved.	Continuous
E3-6	Emission Control Devices	No such devices	Continuous
E3-7	Title V Permit Renewal	Permit No. 569269	Continuous
E3-8	Air Pollution Regulations	In compliance, no deviations	Continuous
E3-9	Title V Permit 569269	In compliance, no deviations.	Continuous
E3-10	Accidental Release Plan	Compliance is Certified Annually.	Continuous
E3-11	CAM Plan	NA	NA
E3-12	NESHAP	HAP emissions record maintained on site.	Continuous
E3-13	Recordkeeping	Records maintained on site.	Continuous
E3-14	Recordkeeping	Records maintained on site.	Continuous

<b>Cndtn .</b>	<b>Requirements</b>	<b>Method or Means to Determine Compliance</b>	<b>Compliance Status</b>
E3-15	For Compliance with VOC and HAP emission limits, logs of material, usage, density, VOC content and HAP content are to be kept (LOG 1 and LOG 2)	Records maintained on site.	Continuous
E4-1	The use of mold release compounds containing no more than 50% solids, by weight will assure compliance.	Solvent Wax contains 4.5% max solids.	Continuous
E4-2 (MM1)	VOC emitted shall not exceed 308 tons during all intervals of twelve (12) consecutive months <ul style="list-style-type: none"> <li>• TDI emissions to be calculated as <math>3.29 \times 10^{-5}</math> lb emitted per lb used</li> <li>• DEOA emissions to be calculated as <math>7.94 \times 10^{-6}</math> lb emitted per lb used</li> <li>• MDI emissions to be calculated as <math>9.39 \times 10^{-6}</math> lb emitted per lb used</li> </ul>	VOC emissions record maintained on site.  No deviations to record keeping.	Continuous
E4-3	The source is subject all applicable requirements of 40 CFR Part 63, Subpart OOOOOOO, National Emission Standards for Flexible Polyurethane Foam Production and Fabrications Area Sources.	Adient eliminated Methylene Chloride use long before CAAA <sub>90</sub> was enacted.	Continuous

## **DEVIATIONS, EXCURSIONS AND EXCEEDANCES:**

**\*\*No Deviations Occurred during Reporting Period**



## RESPONSIBLE OFFICIAL CERTIFICATION

I, the undersigned, am the responsible official as defined in TAPCR 1200-3-9-.02 (11)(b)21. of the Title V source for which this document is being submitted. With the possible exception of those permit terms and conditions identified above (referring to a list of deviations, exceedances and excursions), the emission sources described in permit # 569269 were in compliance with all permit terms and conditions over the previous year as determined by all required testing and monitoring in the permit and other material information.

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.

A handwritten signature in blue ink, appearing to read "Kris Foster", written over a horizontal line.

(Signature)

11/29/22

(Date)

Kris P. Foster  
(Printed Name)

EHS Analyst  
(Title)

{Note: Attachments, if required, are created by the Responsible Official and should consist of the information specified and any supporting records. The Responsible Official may also attach additional information when elaboration is required for clarity.}

cc: Air & EPCRA Enforcement Branch, USEPA Region IV, 61 Forsyth St. SW, Atlanta, GA  
30303  
File