

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, 2022 – September 30, 2022); 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, 2022 – September 30, 2022
Report Deadline:	November 30, 2022

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 received a minor modification to the Title V Permit. The facility has a VOC limit of 308 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 308 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 1/21/2021.
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 in January 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). 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-22

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	8489.0	6.15	26.10							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	110	0.00	0.00							
Silicon (8737)	7.96	544	0.00	0.00							
Surfactant (8724 LF)	7.98	1273	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1594	0.50	0.40							
DL-02596 Black	9.82	1042	0.00	0.00							
Jeffcat - ZF 20	7.07	253	0.00	0.00							
Catalyst Tegoanin 33	8.48	451	0.00	0.00							
YUKOL - 8331	9.07	417	0.00	0.00							
LH5261W UV	8.43	664	0.00	0.00							
BIOH 2828	8.40	1574	0.00	0.00							
Multranol 3901	8.40	2979	0.00	0.00							
Polyol (E833)	8.52	61851	0.00	0.00							
Polyol (E855)	8.76	76613	0.00	0.00							
V-360	9.05	5990	0.00	0.00							
TD-80	10.17	41300	10.17	0.01	0.00003290	0.00691					0.00691
Diethanolamine (DEQA)	9.11	1941	7.74	0.0001			0.00000794	0.00007			0.00007
Diphenylmethane Diisocyanate (MDI)	10	2286	10.00	0.00011					0.00000939	0.00011	0.00011
TOTALS		209,436		26.68		0.00691		0.00007		0.00011	0.00709

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

Month: May-22

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	4566.0	6.15	14.04							
Hightower HT 2019 (Water Based)	8.31	619	0.000831	0.00							
Mold Release Agent (solvent based) PU11547	6.8	4427	6.05	13.39							
Paste Wax (H179K-8)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	670	0.00	0.00							
Surfactant (8724 LF)	7.98	1187	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	1835	0.50	0.46							
DL-02596 Black	9.82	0	0.00	0.00							
Jeffcat - ZF 20	7.07	254	0.00	0.00							
Catalyst Tegoanin 33	8.48	539	0.00	0.00							
YUKOL - 8331	9.07	327	0.00	0.00							
LH5261W UV	8.43	484	0.00	0.00							
BIOH 2828	8.40	3334	0.00	0.00							
Multranol 3901	8.40	3625	0.00	0.00							
Polyol (E833)	8.52	69699	0.00	0.00							
Polyol (E855)	8.76	84812	0.00	0.00							
V-360	9.05	6752	0.00	0.00							
TD-80	10.17	47471	10.17	0.01	0.00003290	0.00794					0.00794
Diethanolamine (DEQA)	9.11	1442	7.74	0.0001			0.00000794	0.00005			0.00005
Diphenylmethane Diisocyanate (MDI)	10	2307	10.00	0.00011					0.00000939	0.00011	0.00011
TOTALS		234,415		28.07		0.00794		0.00005		0.00011	0.00810

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

Month: June-22

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	9625.0	6.15	29.60							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	1071	0.00	0.00							
Surfactant (8724 LF)	7.98	1094	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	3376	0.50	0.84							
DL-02596 Black	9.82	2823	0.00	0.00							
Jeffcat - ZF 20	7.07	290	0.00	0.00							
Catalyst Tegoanin 33	8.48	832	0.00	0.00							
YUKOL - 8331	9.07	235	0.00	0.00							
LH5261W UV	8.43	420	0.00	0.00							
BIOH 2828	8.40	7787	0.00	0.00							
Multranol 3901	8.40	3972	0.00	0.00							
Polyol (E833)	8.52	93336	0.00	0.00							
Polyol (E855)	8.76	118264	0.00	0.00							
V-360	9.05	9185	0.00	0.00							
TD-80	10.17	68921	10.17	0.01	0.00003290	0.01153					0.01153
Diethanolamine (DEQA)	9.11	1153	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	3134	10.00	0.00015					0.00000939	0.00015	0.00015
TOTALS		-		30.62		0.01153		0.00004		0.00015	0.01172

Adient INTERNAL

LOG 1 FY22

Monthly log for (28-0076-01)

Month: July-22

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	7218.0	6.15	22.20							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	60	5.15	0.15							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	691	0.00	0.00							
Surfactant (8724 LF)	7.98	680	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2134	0.50	0.53							
DL-02596 Black	9.82	978	0.00	0.00							
Jeffcat - ZF 20	7.07	185	0.00	0.00							
Catalyst Tegoanin 33	8.48	535	0.00	0.00							
YUKOL - 8331	9.07	160	0.00	0.00							
LH5261W UV	8.43	407	0.00	0.00							
BIOH 2828	8.40	5103	0.00	0.00							
Multranol 3901	8.40	2979	0.00	0.00							
Polyol (E833)	8.52	61403	0.00	0.00							
Polyol (E855)	8.76	75963	0.00	0.00							
V-360	9.05	5556	0.00	0.00							
TD-80	10.17	42252	10.17	0.01	0.00003290	0.00707					0.00707
Diethanolamine (DEOA)	9.11	883	7.74	0.0000			0.00000794	0.00003			0.00003
Diphenylmethane Diisocyanate (MDI)	10	2009	10.00	0.00009					0.00000939	0.00009	0.00009
TOTALS		209,196		22.89		0.00707		0.00003		0.00009	0.00719

LOG 1 FY22

Monthly log for (28-0076-01)

Month: August-22

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	9215.0	6.15	28.34							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	1101	0.00	0.00							
Surfactant (8724 LF)	7.98	1030	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	3386	0.50	0.85							
DL-02596 Black	9.82	1625	0.00	0.00							
Jeffcat - ZF 20	7.07	298	0.00	0.00							
Catalyst Tegoanin 33	8.48	847	0.00	0.00							
YUKOL - 8331	9.07	190	0.00	0.00							
LH5261W UV	8.43	614	0.00	0.00							
BIOH 2828	8.40	7948	0.00	0.00							
Multranol 3901	8.40	4110	0.00	0.00							
Polyol (E833)	8.52	96216	0.00	0.00							
Polyol (E855)	8.76	123364	0.00	0.00							
V-360	9.05	9596	0.00	0.00							
TD-80	10.17	68667	10.17	0.01	0.00003290	0.01149					0.01149
Diethanolamine (DEOA)	9.11	1362	7.74	0.0000			0.00000794	0.00005			0.00005
Diphenylmethane Diisocyanate (MDI)	10	3086	10.00	0.00014					0.00000939	0.00014	0.00014
TOTALS		332,720		29.36		0.01149		0.00005		0.00014	0.01168

LOG 1 FY22

Monthly log for (28-0076-01)

Month: September-22

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	10957.0	6.15	33.69							
Hightower HT 2011UV (Water Based)	8.31	0	0.000831	0.00							
		0		0.00							
Paste Wax (H179K-7)	6.82	65	5.15	0.17							
Adhesive (Simalfa 309)	8.34	0	0.00	0.00							
Silicon (8737)	7.96	966	0.00	0.00							
Surfactant (8724 LF)	7.98	967	0.00	0.00							
8735 LF2	8.13	0	0.00	0.00							
Glycerine	10.60	2947	0.50	0.74							
DL-02596 Black	9.82	1223	0.00	0.00							
Jeffcat - ZF 20	7.07	258	0.00	0.00							
Catalyst Tegoanin 33	8.48	739	0.00	0.00							
YUKOL - 8331	9.07	152	0.00	0.00							
LH5261W UV	8.43	844	0.00	0.00							
BIOH 2828	8.40	6978	0.00	0.00							
Multranol 3901	8.40	2935	0.00	0.00							
Polyol (E833)	8.52	84229	0.00	0.00							
Polyol (E855)	8.76	107882	0.00	0.00							
V-360	9.05	8368	0.00	0.00							
TD-80	10.17	60244	10.17	0.01	0.00003290	0.01008					0.01008
Diethanolamine (DEOA)	9.11	1172	7.74	0.0000			0.00000794	0.00004			0.00004
Diphenylmethane Diisocyanate (MDI)	10	2609	10.00	0.00012					0.00000939	0.00012	0.00012
TOTALS		293,535		34.61		0.01008		0.00004		0.00012	0.01024

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LOG 2 FY22 YEARLY LOG FOR (28-0076-01) Semi-Annual Reports: Annual Report: 2022

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-21	24.8	267.5	0.00621	0.06628	0.00004	0.00048	0.00012	0.00164	0.00637	0.06841
November-21	24.8	279.0	0.00643	0.06803	0.00004	0.00049	0.00012	0.00166	0.00659	0.07019
December-21	20.4	281.4	0.00629	0.06930	0.00004	0.00048	0.00014	0.00172	0.00646	0.07150
January-22	23.5	281.5	0.00619	0.06978	0.00005	0.00049	0.00010	0.00174	0.00634	0.07201
February-22	25.9	287.3	0.00698	0.07205	0.00005	0.00052	0.00011	0.00177	0.00714	0.07434
March-22	36.3	286.6	0.01119	0.07565	0.00007	0.00054	0.00015	0.00173	0.01140	0.07792
April-22	26.7	290.1	0.00691	0.07670	0.00007	0.00058	0.00011	0.00169	0.00709	0.07898
May-22	28.1	301.8	0.00794	0.08164	0.00005	0.00058	0.00011	0.00169	0.00810	0.08391
June-22	30.6	304.8	0.01153	0.08644	0.00004	0.00058	0.00015	0.00164	0.01172	0.08865
July-22	22.9	307.1	0.00707	0.08859	0.00003	0.00058	0.00009	0.00159	0.00719	0.09076
August-22	29.4	307.9	0.01149	0.09220	0.00000	0.00058	0.00014	0.00145	0.01168	0.09423
September-22	34.6	327.9	0.01008	0.09830	0.00004	0.00057	0.00012	0.00147	0.01024	0.10034