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July 18, 2022

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

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

Ms. Owenby,

This letter is being submitted at the request of the Tennessee Department of Environment and Conservation (TDEC) and serves as an agreement by Adient US LLC Pulaski (Adient) to establish volatile organic (VOC) and particulate matter (PM<sub>10</sub>) emission limits from the foam molding operations as represented in whole or part in the construction permit application dated March 30, 2022. Notwithstanding this agreement, Adient retains the right and opportunity to review and comment on all draft construction permit terms and conditions available ahead of the public comment period and during the public comment period and to utilize any appeal right it may have with respect to any terms or conditions it does not believe are appropriate.

As a part of this major PSD air permit request, Adient seeks to increase its production rates. The agreed upon emission rates are summarized in **Table 1**.

Table 1. Maximum Air Contaminant Emission Rates

Air Contaminant	Maximum Emission Rate
VOC	491.4 tons per year as calculated across a consecutive rolling 12-month basis
PM <sub>10</sub>	9.9 tons per year and 3.0 pounds per hour

The annual VOC and PM<sub>10</sub> emission rates are based on the maximum potential emission rates generated by the foam molding operations excluding insignificant sources and exempt sources at the facility. The annual VOC and PM<sub>10</sub> emission rates are calculated for an entire year and are considered the mass emissions as averaged over a period of 12 consecutive months.

The Significant Emissions Rate (SER) for PM<sub>10</sub> is 15 tons per year (tpy). Adient is proposing a maximum PM<sub>10</sub> emission rate of 9.9 tpy. Consequently, the SER will not be exceeded. In regard to the requirement to impose shorter term limits on PM<sub>10</sub> emissions, Adient proposes a limit on PM<sub>10</sub> emissions at a rate of 3.0 pounds per hour (lb/hour) to allow for operational flexibility and production variability routinely experienced during certain periods of time in any given month or year. Adient recognizes that at a maximum PM<sub>10</sub> emission rate of 3.0 lb/hour,

the annual PM<sub>10</sub> emission rate would otherwise be greater than 9.9 tpy. A maximum emission rate of, or potential to emit (PTE) PM<sub>10</sub> at 3.0 lb/hr based upon sustained emissions over 8,760 hours would equate to 13.14 tpy, which remains below the SER of 15 tons per year for PM<sub>10</sub>. However, Adient is voluntarily accepting an annual restriction/limit on PM<sub>10</sub> emissions of 9.9 tpy. The combination of the longer-term annual PM<sub>10</sub> emissions rate with the projected and slightly higher hourly equivalent PM<sub>10</sub> emissions rate will:

- 1) Provide for a significant decrease in currently allowed particulate matter emissions from the process;
- 2) Cap annual emission at slightly less than two-thirds of the SER for PM<sub>10</sub>; and
- 3) Provide necessary production flexibility while also allowing for seasonality and business/production variations.

Adient will demonstrate compliance with the above-referenced VOC and PM<sub>10</sub> emission limits by the following methods already in place and required by the facility's current Title V operating permit no. 569269 including Minor Modification #1.

Table 2. Compliance Demonstration (Abbreviated)

Permit Condition No.	Compliance Demonstration	Regulatory Reference
E3-1	Visible emissions at this facility shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period in any one (1) hour period, and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).	TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6), EPA Test Method 9
E3-2 and E-3	Maintenance of Safety Data Sheets (SDSs) and Material Safety Data Sheets (MSDSs) as well as other documentation (e.g. manufacturer/supplier formulation data, technical data sheets, environmental data sheets) for purposes of a mass balance calculation of emissions.	TAPCR 1200-03-10-.02(2)(a)
E3-13	Regarding recordkeeping of logs, the following is applicable: a) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required. b) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 7 days from the end of the week for which the data is required. c) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 7 days from the end of the day for which the data is required.	TAPCR 1200-03-10-.02(2)(a)
E3-15	For purposes of compliance with Volatile Organic Compound (VOC) and Hazardous Air Pollutants (HAPs) emissions limits in this permit, the following logs	TAPCR 1200-03-10-.02(2)(a)

Permit Condition No.	Compliance Demonstration	Regulatory Reference
	(LOG 1 and LOG 2) shall be used. These logs shall contain all volatile emissions excluding water and/or exempt compounds and also shall contain all HAPs. Logs in an alternate format providing the same information may be used. Records shall also be retained to verify the HAP content of each material. This may include MSDS, formulation data, or other documentation to establish the HAP content. These logs and records must be retained for a period of not less than five years and shall be reported in accordance with <b>Condition E2</b> of this permit. Also, these logs shall include records of VOC or HAP emissions from any source which is considered to be insignificant or exempt under the provisions of TAPCR 1200-03-09-.04.	
E4-2	<p>Volatile organic compounds (VOC) emitted from this source shall not exceed <b>491.4</b> tons during all intervals of twelve (12) <b>(MM1)</b> consecutive months.</p> <p><b>Compliance Method:</b> The permittee shall calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month and during each twelve consecutive (12) month period. The permittee shall maintain records of these emissions in a form that readily shows compliance with this condition. (See <b>Logs 1 and 2</b> of <b>Condition E3-15</b> for an example) These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or representative thereof. These logs must also be reported in accordance with <b>Condition E2</b> of this permit and be retained for a period of not less than five (5) years.</p> <ul style="list-style-type: none"> <li>Toluene Diisocyanate (TDI) emissions shall be calculated using the emission factor of <b><math>3.29 \times 10^{-5}</math></b> lb TDI emitted per lb of TDI used. This emission factor is based on a source test performed on October 1, 1997.</li> <li>Diethanolamine (DEOA) emissions shall be calculated using the emission factor of <b><math>7.94 \times 10^{-6}</math></b> lb DEOA emitted per lb of DEOA used. This emission factor is based on a source test performed on October 1, 1997.</li> <li>Methylene Diphenyl Diisocyanate (MDI) emissions shall be calculated using the emission factor of <b><math>9.39 \times 10^{-6}</math></b> lb MDI emitted per lb of MDI used. This emission factor is based on a source test performed on October 1, 1997.</li> </ul>	TAPCR 1200-03-07-.07(2)
New permit condition	The permittee shall calculate the actual quantities of PM <sub>10</sub> emitted from this facility on a daily basis, and based on the daily data, calculate hourly emissions for each day. The permittee shall calculate the actual quantities of PM <sub>10</sub> emitted from this facility during	TBD

Permit Condition No.	Compliance Demonstration	Regulatory Reference
	each calendar month and during each twelve consecutive (12) month period.	

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,



Ryan Speck  
Plant Manager

Cc: Kris Patrick Foster, Adient; Ricki Palmer, Adient Ann O'Brien; SCS Engineers; Jeffrey M. Pfost, Environmental Partners, Inc.; Stephanie Taylor, SCS Engineers