

**From:** [Air.Pollution Control](#)  
**To:** [APC Permitting](#)  
**Subject:** FW: Adient 28-0076 Title V Permit Application  
**Date:** Friday, June 2, 2023 12:07:58 PM  
**Attachments:** [Title V permit Application signed.pdf](#)

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**From:** Kris Patrick Foster <kris.patrick.foster@adient.com>  
**Sent:** Friday, June 2, 2023 11:32 AM  
**To:** Air.Pollution Control <Air.Pollution.Control@tn.gov>  
**Cc:** Tracy Kefauver <Tracy.Kefauver@tn.gov>; Ricki H Palmer <ricki.h.palmer@adient.com>; jeff.pfost@enviro-partners.com; Kris Patrick Foster <kris.patrick.foster@adient.com>  
**Subject:** [EXTERNAL] Adient 28-0076 Title V Permit Application

**\*\*\* 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 Title V Operating Permit Application package for Adient US LLC, Pulaski, TN. Facility ID 28-0076.

Thank you!



**Kris P. Foster**

***Environmental, Health and Safety Lead***

**1890 Mines Road**

**Pulaski, TN 38478**

**Cell: 931-638-5918**

**Office: 931-424-7848**

Adient – INTERNAL



MAJOR SOURCE OPERATING PERMIT APPLICATION  
FACILITY IDENTIFICATION

1. FACILITY NAME AND OWNER'S NAME IF DIFFERENT FROM THE FACILITY NAME: Adient US LLC		FOR	APC COMPANY NO.
MAILING ADDRESS ( ST/RD/P.O. BOX ): 1890 Mines Road		APC	LOG/PERMIT NO.
CITY, STATE, ZIP CODE: Pulaski, TN 38478-905		USE  ONLY	
2. FACILITY LOCATION ( ST/RD/HWY ): Same		COUNTY NAME:  Giles	
CITY OR DISTANCE TO NEAREST TOWN, ZIP CODE: Pulaski		TELEPHONE NUMBER WITH AREA CODE: 931-363-5666	
3. FACILITY'S PRIMARY ACTIVITY AND THE FIRST TWO DIGITS OF THE FACILITY SIC CODE( S ): Automotive Seating - 37			
4. CONTACT PERSON'S NAME FOR THIS PERMIT: Kris P. Foster	TITLE: Environmental Health and Safety Lead	TELEPHONE NUMBER WITH AREA CODE 931-363-5666	
5. IF FACILITY IS LOCATED IN AN AREA DESIGNATED AS "NONATTAINMENT" OR "ADDITIONAL CONTROL", INDICATE THE POLLUTANT ( S ) FOR THE DESIGNATION. N.A.			
6. 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 Renewal Pending) 980244 (Construction PSD Permit) Source Number 01			
7. PERMIT REQUESTED FOR:  INITIAL APPLICATION TO OPERATE : _____ RELOCATION TO OPERATE : _____ MODIFICATION : <u>X</u> _____ PERMIT RENEWAL TO OPERATE : <u>X</u> _____ REVISION ( ADMINISTRATIVE AMENDMENTS ) : _____			
8. OWNER'S REGISTERED AGENT'S NAME & ADDRESS FOR SERVICE OF PROCESS		TELEPHONE NUMBER WITH AREA CODE	
9. IS THIS FACILITY SUBJECT TO THE PROVISIONS GOVERNING PREVENTION OF ACCIDENTAL RELEASES OF HAZARDOUS AIR CONTAMINANTS CONTAINED IN CHAPTER 1200-3-32 OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS?  IF THE ANSWER IS YES, ARE YOU IN COMPLIANCE WITH THE PROVISIONS OF CHAPTER 1200-3-32 OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS?  _____X_____ YES _____NO _____X_____ YES _____NO			
10. PAGE NUMBER: 1		REVISION NUMBER: 01 DATE OF REVISION: 5/30/2023	



MAJOR SOURCE OPERATING 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 DECIAGRAM 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 with mold release, and/or with hand applied application techniques to prevent the foam from sticking to the mold. VOC emissions from the process are mostly from the use of mold release agents. Wax in the mold release materials may be emitted as total suspended particulates via process vents.

Liquid foam components are added (poured) into the open mold, the mold is closed, the foam expands to fill the cavity of the mold and the foam cures in the closed mold. Once cured, the foam part is extracted, the mold is cleaned and the cycle is repeated.

Previous Title V renewal documents should be updated to include the PSD major sources revisions from September, 2022 to reflect higher wax usages resulting in modified VOC and PM emission rates.

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: 2

REVISION NUMBER: 01

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MAJOR SOURCE OPERATING PERMIT APPLICATION  
STACK IDENTIFICATION

1. FACILITY NAME: Adient US LLC Pulaski		FOR APC	APC COMPANY NO.
2. STACK ID ( OR FLOW DIAGRAM POINT IDENTIFICATION ); F1 through F12 (12 Identical Stacks)		USE ONLY	LOG/PERMIT NO.
3. EMISSION SOURCE ( IDENTIFY ); 01 Polyurethane Foam Production (automotive seats)			
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: 3	
7. EXHAUST FLOW RATE AT EXIT CONDITIONS ( ACFM ); 22,250		8. FLOW RATE AT STANDARD CONDITIONS (DSCFM): 22020	
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 ( <u>FOR STACKS SUBJECT TO DIFFUSION EQUATION ONLY</u> ): _____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, SO <sub>2</sub> , NO <sub>x</sub> , etc. )? NA			
COMPLETE THE APPROPRIATE APC FORM(S) V.4, V.5, V.7, V.8, V.9, OR V.10 FOR EACH SOURCE EXHAUSTING THROUGH THIS STACK.			
13. DO YOU HAVE A BYPASS STACK? _____ YES _____X_____ NO  IF YES, DESCRIBE THE CONDITIONS WHICH REQUIRE ITS USE & COMPLETE APC FORM V.3 FOR THE BYPASS STACK. PLEASE IDENTIFY THE STACK NUMBER( S ) OR FLOW DIAGRAM POINT NUMBER( S ) EXHAUSTING THROUGH THIS BYPASS STACK.			
14. PAGE NUMBER: 3		REVISION NUMBER: 01	
DATE OF REVISION 5/30/2023			



MAJOR SOURCE OPERATING PERMIT APPLICATION  
MISCELLANEOUS PROCESSES

1. FACILITY NAME: Adient US LLC Pulaski	2. PROCESS IDENTIFICATION NUMBER: 28-0076-01 Polyurethane Foam Manufacturing		
3. STACK ID OR FLOW DIAGRAM POINT IDENTIFICATION ( S ): F1 through F12			
IF EMISSIONS ARE CONTROLLED FOR COMPLIANCE, ATTACH THE APPROPRIATE AIR POLLUTION CONTROL SYSTEM FORM.			
4. NORMAL OPERATING SCHEDULE:  ___ 24 ___ HRS/DAY    ___ 5 ___ DAYS/WK    ___ 240 ___ DAYS/YR	5. YEAR OF CONSTRUCTION OR LAST MODIFICATION: September 22, 2022 (PSD major modification)		
6. DESCRIBE THIS PROCESS ( PLEASE ATTACH A FLOW DIAGRAM OF THIS PROCESS ) AND CHECK ONE OF THE FOLLOWING:  _____ BATCH        ___ X ___ CONTINUOUS			
7. LIST THE TYPES AND AMOUNTS OF RAW MATERIALS INPUT TO THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE USAGE ( UNITS )	MAXIMUM USAGE (UNITS)
Wax Mold Release			
8. LIST THE TYPES AND AMOUNTS OF PRIMARY PRODUCTS PRODUCED BY THIS PROCESS:			
MATERIAL	STORAGE/MATERIAL HANDLING PROCESS	AVERAGE AMOUNT PRODUCED ( UNITS )	MAXIMUM AMOUNT PRODUCED ( UNITS )
Foam Components			
9. PROCESS FUEL USAGE:			
TYPE OF FUEL	MAX HEAT INPUT ( 10 <sup>6</sup> BTU/HR )	AVERAGE USAGE ( UNITS )	MAXIMUM USAGE ( UNITS )
none			
10. 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. NA			
11. DESCRIBE ANY FUGITIVE EMISSIONS ASSOCIATED WITH THIS PROCESS, SUCH AS OUTDOOR STORAGE PILES, OPEN CONVEYORS, OPEN AIR SAND BLASTING, MATERIAL HANDLING OPERATIONS, etc. ( PLEASE ATTACH A SEPARATE SHEET IF NECESSARY ) . All emissions are assumed to be point source.			
12. LOCATION OF THIS PROCESS EMISSION SOURCE IN UTM COORDINATES:			
UTM VERTICAL: 3898.504        UTM HORIZONTAL: 493.569			





COMPLIANCE CERTIFICATION - MONITORING AND REPORTING  
DESCRIPTION OF METHODS USED FOR DETERMINING COMPLIANCE

ALL SOURCES THAT ARE SUBJECT TO 1200-3-9-.02(11) OF 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.

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

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 EMISSIONS MONITORING (CEM) - APC FORM V.20  
POLLUTANT(S): \_\_\_\_\_

\_\_\_\_\_ EMISSION MONITORING USING PORTABLE MONITORS - APC FORM V.21  
POLLUTANT(S): \_\_\_\_\_

☒ MONITORING CONTROL SYSTEM PARAMETERS OR OPERATING PARAMETERS OF A PROCESS - APC FORM V.22  
POLLUTANT(S): \_\_\_\_\_

\_\_Opacity – Visual Observation\_\_

\_\_\_\_\_ MONITORING MAINTENANCE PROCEDURES - APC FORM V.23  
POLLUTANT(S): \_\_\_\_\_

\_\_\_\_\_ STACK TESTING - APC FORM V.24  
POLLUTANT(S): \_\_\_\_\_

\_\_\_\_\_ FUEL SAMPLING & ANALYSIS (FSA) - APC FORM V.25  
POLLUTANT(S): \_\_\_\_\_

☒ RECORDKEEPING - APC FORM V.26  
POLLUTANT(S): \_\_\_\_\_

\_\_PM and VOC\_\_

\_\_\_\_\_ OTHER (PLEASE DESCRIBE) - APC FORM V.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: \_\_\_\_\_

AND EVERY \_\_\_\_\_ DAYS THEREAFTER.

7. PAGE NUMBER: 5

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MAJOR SOURCE OPERATING 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.

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

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.

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) performed annually

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MAJOR SOURCE OPERATING 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

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	
4. POLLUTANT( S ) OR PARAMETER BEING MONITORED: PM and VOC	
5. MATERIAL OR PARAMETER BEING MONITORED AND RECORDED: Material Usage and Material Formulation Data with Source Specific Emission Factors for Quantification and Reporting	
6. METHOD OF MONITORING AND RECORDING: Monthly and Daily record of the actual usage of Polyurethane Foam Manufacturing materials.  Emissions are estimated as follows:  1. PM - (Material Usage) x (PM content) x 0.2375  2. VOC - (Material Usage) x (VOC content)  3. TDI, MDI, DEOA - (Material Usage) x (HAP content) x (Emissions Factor)  Note: TDI and MDI are reactants in the foam materials and are largely consumed or locked into the matrix of the foam. The compound emission factors are from testing performed on October 1, 1997.  PM emissions factor is from an engineering test conducted 5/9/2023.	
7. COMPLIANCE DEMONSTRATION FREQUENCY ( SPECIFY THE FREQUENCY WITH WHICH COMPLIANCE WILL BE DEMONSTRATED ): Monthly Calculations	
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MAJOR SOURCE OPERATING PERMIT APPLICATION  
EMISSIONS FROM PROCESS EMISSION SOURCE / FUEL BURNING INSTALLATION / INCINERATOR

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				
4. COMPLETE THE FOLLOWING <u>EMISSIONS SUMMARY FOR REGULATED AIR POLLUTANTS</u> . 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 V.30 )	TONS PER YEAR	RESERVED FOR STATE USE ( POUNDS PER HOUR-ITEM 8, APC V.30 )
PARTICULATES ( TSP )	9.9		≤ 9.9	
( FUGITIVE EMISSIONS )				
SULFUR DIOXIDE				
( FUGITIVE EMISSIONS )				
VOLATILE ORGANIC COMPOUNDS	491.40		≤ 491.4	
( 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 V.30 )	TONS PER YEAR	RESERVED FOR STATE USE ( POUNDS PER HOUR- ITEM 8 APC V.30 )
ASBESTOS				
( FUGITIVE EMISSIONS )				
BERYLLIUM				
( FUGITIVE EMISSIONS )				
VINYL CHLORIDE				
( FUGITIVE EMISSIONS )				
FLUORIDES				
( FUGITIVE EMISSIONS )				
GASEOUS FLUORIDES				
( FUGITIVE EMISSIONS )				

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 V.30 )	TONS PER YEAR	RESERVED FOR STATE USE ( POUNDS PER HOUR- ITEM 8 APC V.30 )
TDI 26471-62-5			<1	
MDI 101-68-8			<1	
DEOA 111-42-2			<1	

6. PAGE NUMBER: 8 &amp; 9

REVISION NUMBER: 01

DATE OF REVISION 5/30/2023



MAJOR SOURCE OPERATING PERMIT APPLICATION  
EMISSION SUMMARY FOR THE FACILITY OR FOR THE SOURCES CONTAINED IN THIS APPLICATION

1. FACILITY NAME: Adient US LLC Pulaski				
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 V.28 )	TONS PER YEAR	RESERVED FOR STATE USE ( POUNDS PER HOUR-ITEM 4, APC V.28 )
PARTICULATES ( TSP )	9.9		≤ 9.9	
SULFUR DIOXIDE				
VOLATILE ORGANIC COMPOUNDS	491.40		≤491.4	
CARBON MONOXIDE				
LEAD				
NITROGEN OXIDES				
TOTAL REDUCED SULFUR				
MERCURY				
ASBESTOS				
BERYLLIUM				
VINYL CHLORIDES				
FLUORIDES				
GASEOUS FLUORIDES				

( CONTINUED ON NEXT PAGE )

( CONTINUED FROM PREVIOUS 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.

[illegible]

- |                         |                     |                             |
|-------------------------|---------------------|-----------------------------|
| 4. PAGE NUMBER: 10 & 11 | REVISION NUMBER: 01 | DATE OF REVISION: 5/30/2023 |
|-------------------------|---------------------|-----------------------------|



MAJOR SOURCE OPERATING PERMIT APPLICATION  
CURRENT EMISSIONS REQUIREMENTS AND STATUS

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					
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 Matter	PSD Section V, Condition S1-4(A)	3.00 lb/hr daily basis and	<3	IN
	Particulate Matter	PSD Section V, Condition S1-4(A)	9.90 tons per 12-consecutive months	<9.9	IN
	VOC	PSD Section V, Condition S1-4(B)	491.40 tons of VOC per 12-consecutive months	<491.4	IN
	HAP	Individual HAP Compounds	10 tons	<10	IN
	HAP	Existing Title V Permit Condition E3-12	25 tons	<25	IN
	Opacity	Existing Title V Permit Condition E3-2	20%	<20%	IN
10. OTHER APPLICABLE REQUIREMENTS ( NEW REQUIREMENTS THAT APPLY TO THIS SOURCE DURING THE TERM OF THIS PERMIT )					
9. PAGE NUMBER: 12		REVISION NUMBER: 01		DATE OF REVISION: 5/30/2023	



MAJOR SOURCE OPERATING PERMIT APPLICATION  
COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

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 Manufacturing	
3. INDICATE THAT SOURCE ( S ) WHICH ARE CONTAINED IN THIS APPLICATION ARE PRESENTLY IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS, BY CHECKING THE FOLLOWING:  _X_ 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 V 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 ENHANCED 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 FORM V.31. Not applicable	
6. PAGE NUMBER: 13	REVISION NUMBER: 01
DATE OF REVISION: 5/30/2023	



MAJOR SOURCE OPERATING PERMIT APPLICATION  
APPLICATION COMPLETENESS CHECK LIST

I. IDENTIFICATION INFORMATION				<input checked="" type="checkbox"/> <u>  X  </u> COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
<p>A. FACILITY INFORMATION</p> <p>X YES <input type="checkbox"/> NO</p> <p>PERMIT CONTACT PERSON <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>RESPONSIBLE OFFICIAL <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>PERMIT REQUESTED <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>B. SOURCE DESCRIPTION</p> <p>1. OPERATIONAL INFORMATION:</p> <p>SIC CODE(S) <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>LISTING AND DESCRIPTION OF EMISSION SOURCE(S) <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>2. IDENTIFICATION AND DESCRIPTION OF ALTERNATIVE OPERATIVE SCENARIOS (IF APPLICABLE) <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <u>  X  </u> N/A</p> <p>C. PERMIT SHIELD REQUESTED <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p>						
II. EMISSIONS INFORMATION				<input checked="" type="checkbox"/> <u>  X  </u> COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
<p>A. QUANTIFICATION OF ALL EMISSIONS OF REGULATED AIR POLLUTANTS <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>B. EMISSION SOURCES:</p> <p>IDENTIFICATION AND DESCRIPTION OF ALL EMISSION SOURCES IN SUFFICIENT DETAIL TO ESTABLISH THE BASIS FOR FEES AND APPLICABILITY OF REQUIREMENTS <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO</p> <p>A LIST OF INSIGNIFICANT EMISSIONS UNITS OR ACTIVITIES EXEMPTED BECAUSE OF SIZE OR PRODUCTION RATE <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <u>  X  </u> N/A</p> <p>C. PROCESS INFORMATION TO THE EXTENT IT IS NEEDED TO DETERMINE OR REGULATE EMISSIONS:</p> <p>FUELS <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <u>  X  </u> N/A</p> <p>RAW MATERIAL(S) / MATERIALS USED <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>PRODUCTION RATES <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <u>  X  </u> N/A</p> <p>D. FOR REGULATED AIR POLLUTANTS, LIMITATIONS ON SOURCE OPERATIONS AFFECTING:</p> <p>EMISSIONS <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>ANY WORK PRACTICE STANDARDS <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> <u>  X  </u> N/A</p> <p>E. OTHER INFORMATION REQUIRED BY ANY APPLICABLE REQUIREMENTS FOR ALL REGULATED AIR POLLUTANTS SUCH AS:</p> <p>UTM COORDINATES OF EMISSION SOURCES <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>FLOW RATES <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>STACK PARAMETERS <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>F. CALCULATIONS ON WHICH EMISSIONS RELATED INFORMATION ARE BASED <input checked="" type="checkbox"/> <u>  X  </u> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p>						



## MAJOR SOURCE OPERATING PERMIT APPLICATION - APPLICATION COMPLETENESS CHECK LIST

III. APPLICABILITY			
	<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
A.	CITATION AND DESCRIPTION OF ALL APPLICABLE REQUIREMENTS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
B.	OTHER SPECIFIC INFORMATION THAT MAY BE NECESSARY TO IMPLEMENT AND ENFORCE OTHER APPLICABLE REQUIREMENTS OF RULE 1200-3-9-.02(11) OF THE TENNESSEE AIR POLLUTION CONTROL REGULATIONS OR TO DETERMINE THE APPLICABILITY OF REQUIREMENTS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
C.	AN EXPLANATION OF ANY PROPOSED EXEMPTIONS FROM OTHERWISE APPLICABLE REQUIREMENTS		<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> X N/A
IV. COMPLIANCE			
	<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
A.	COMPLIANCE STATUS		
1.	A DESCRIPTION OF THE COMPLIANCE STATUS OF THE SOURCE WITH RESPECT TO ALL APPLICABLE REQUIREMENTS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
2.	FOR APPLICABLE REQUIREMENTS WITH WHICH THE SOURCE IS IN COMPLIANCE, A STATEMENT THAT THE SOURCE WILL CONTINUE TO COMPLY WITH SUCH REQUIREMENTS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
3.	FOR APPLICABLE REQUIREMENTS THAT WILL BECOME EFFECTIVE DURING THE PERMIT TERM, A STATEMENT THAT THE SOURCE WILL MEET SUCH REQUIREMENTS ON A TIMELY BASIS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
4.	FOR REQUIREMENTS FOR WHICH THE SOURCE IS NOT IN COMPLIANCE AT THE TIME OF PERMIT ISSUANCE, A NARRATIVE DESCRIPTION OF HOW THE SOURCE WILL ACHIEVE COMPLIANCE WITH SUCH REQUIREMENTS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
5.	IDENTIFICATION AND DESCRIPTION OF AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES OR ACTIVITIES		<input type="checkbox"/> YES <input checked="" type="checkbox"/> X NO NA
6.	DESCRIPTION OF OR REFERENCE TO ANY APPLICABLE TEST METHOD FOR DETERMINING COMPLIANCE WITH EACH APPLICABLE REQUIREMENT		<input type="checkbox"/> YES <input checked="" type="checkbox"/> X NO NA
B.	COMPLIANCE SCHEDULE		
	<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
1.	A SCHEDULE OF COMPLIANCE FOR SOURCES THAT ARE NOT IN COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS AT THE TIME OF PERMIT ISSUES		<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> X N/A
2.	A SCHEDULE FOR SUBMISSION OF CERTIFIED PROGRESS REPORTS NO LESS FREQUENTLY THAN EVERY SIX MONTHS FOR SOURCES REQUIRED TO HAVE A SCHEDULE OF COMPLIANCE TO REMEDY A VIOLATION		<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> X N/A
C.	COMPLIANCE CERTIFICATION		
	<input checked="" type="checkbox"/> X COMPLETE	<input type="checkbox"/> INCOMPLETE	<input type="checkbox"/> NOT APPLICABLE
1.	CERTIFICATION OF COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS BY A RESPONSIBLE OFFICIAL		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
2.	A STATEMENT OF METHODS USED FOR DETERMINING COMPLIANCE, INCLUDING A DESCRIPTION OF MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS AND TEST METHODS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
3.	A SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO
4.	A STATEMENT INDICATING THE SOURCE'S COMPLIANCE STATUS WITH ANY APPLICABLE ENHANCED MONITORING AND COMPLIANCE CERTIFICATION REQUIREMENTS OF THE FEDERAL ACT		<input checked="" type="checkbox"/> X YES <input type="checkbox"/> NO




MAJOR SOURCE OPERATING PERMIT APPLICATION  
INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

1. ADMINISTRATION		
This application contains the following forms:	APC Form V.1, Facility Identification - See Page 1	
	APC Form V.2, Operations and Flow Diagrams – See Page 2	
2. EMISSIONS SOURCE DESCRIPTION		TOTAL NUMBER OF THIS FORM
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form V.3, Stack Identification	Page 3
	APC Form V.4, Fuel Burning Non-Process Equipment	
	APC Form V.5, Stationary Gas Turbines or Internal Combustion Engines	
	APC Form V.6, Storage Tanks	
	APC Form V.7, Incinerators	
	APC Form V.8, Printing Operations	
	APC Form V.9, Painting and Coating Operations	
	APC Form V.10, Miscellaneous Processes	Page 4
	APC Form V.33, Stage I and Stage II Vapor Recovery Equipment	
	APC Form V.34, Open Burning	
3. AIR POLLUTION CONTROL SYSTEM		TOTAL NUMBER OF THIS FORM
This application contains the following forms (one form for each control system in use at the facility):	APC Form V.11, Control Equipment - Miscellaneous	
	APC Form V.12, Condensers	
	APC Form V.13, Adsorbers	
	APC Form V.14, Catalytic or Thermal Oxidation Equipment	
	APC Form V.15, Cyclones/Settling Chambers	
	APC Form V.16, Electrostatic Precipitators	
	APC Form V.17, Wet Collection Systems	



## MAJOR SOURCE OPERATING PERMIT APPLICATION - INDEX OF AIR POLLUTION PERMIT APPLICATION FORMS

4. COMPLIANCE DEMONSTRATION		TOTAL NUMBER OF THIS FORM
This application contains the following forms (one form for each incinerator, printing operation, fuel burning installation, etc.):	APC Form V.19, Compliance Certification - Monitoring and Reporting - Description of Methods for Determining Compliance	Page 5
	APC Form V.20, Continuous Emissions Monitoring	
	APC Form V.21, Portable Monitors	
	APC Form V.22, Control System Parameters or Operating Parameters of a Process	Page 6
	APC Form V.23, Monitoring Maintenance Procedures	
	APC Form V.24, Stack Testing	
	APC Form V.25, Fuel Sampling and Analysis	
	APC Form V.26, Record Keeping	Page 7
	APC Form V.27, Other Methods	
	APC Form V.28, Emissions from Process Emissions Sources / Fuel Burning Installations / Incinerators	Pages 8 & 9
	APC Form V.29, Emissions Summary for the Facility or for the Source Contained in This Application	Pages 10 & 11
	APC Form V.30, Current Emissions Requirements and Status	Page 12
	APC Form V.31, Compliance Plan and Compliance Certification	Page 13
	APC Form V.32, Air Monitoring Network	
<p>5. STATEMENT OF COMPLETENESS AND CERTIFICATION OF COMPLIANCE</p> <p>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 <u>13</u> pages and they are numbered from page <u>1</u> to <u>13</u>. 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.</p>		
Name and Title of Responsible Official	Telephone Number with Area Code	
Kris Foster, Environmental Health and Safety Analyst	931-424-7848	
Signature of Responsible Official	Date of Application	
 <p>(FOR DEFINITION OF RESPONSIBLE OFFICIAL, SEE INSTRUCTIONS FOR APC FORM V.1)</p>	